

GREB Secondary Use of Data Guidelines for Data Sets Initially Collected with an Associated Research Ethics Clearance and for Publicly Available Anonymous Data

To aid in the GREB review process, this policy will only extend to the review of secondary data sets that were initially collected with an associated ethics clearance and for publicly available anonymous data.

Secondary data: Refers to the use in research of information originally collected for a purpose other than the current research purpose.

GREB's Secondary Use of Data Application Form can be used instead of GREB's Standard Application Form for secondary data sets that were initially collected with an associated research ethics clearance and for publicly available anonymous data without restrictions. This form encompasses both identifiable and non-identifiable data sets, pending the guidance outlined in this document and on the application form.

Please note: To use this application form, the following criteria must be met:

1. You must not be collecting primary data;
2. The initial data set was collected with an associated ethics clearance or was collected in the form of publicly available anonymous information without restrictions;
3. Your use of the secondary data is congruent with the initial intended ethically cleared uses of the data set (not applicable for anonymous publicly available information without associated ethics clearance);
4. Your use of the secondary data is congruent with participants' expressed preferences about the future use of their data (may not be applicable for anonymous publicly available information);
5. If your secondary data set contains personally identifiable information, you are required to seek consent from participants for the secondary use of their data or provide justification to GREB based on the requirements outlined below from the Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS2, 2014).

Article 5.5A: Researchers who have not obtained consent from participants for secondary use of identifiable information shall only use such information for these purposes if GREB is satisfied that:

- a) Identifiable information is essential to the research;
- b) The use of identifiable information without the participants' consent is unlikely to adversely affect the welfare of individuals to whom the information relates;

- c) The researchers will take appropriate measures to protect the privacy of individuals, and to safeguard the identifiable information;
- d) The researchers will comply with any known preferences previously expressed by individuals about any use of their information;
- e) It is impossible or impracticable to seek consent from individuals to whom the information relates;
- f) The researchers have obtained any other necessary permissions for secondary use of information for research purposes.

If researchers satisfy all the conditions in (a) to (f), GREB may clear the research without requiring consent from the individuals to whom the information relates.

“Impracticable” refers to undue hardship or onerousness that jeopardizes the conduct of the research; it does not mean mere inconvenience.”

Article 5.5B: Researchers shall seek GREB review, but are not required to seek participant consent, for research that relies exclusively on the secondary use of non-identifiable information.

Application: Researchers must justify to GREB that the secondary information is non-identifiable for all practical purposes. For example, consent would be required for projects where researchers have access to the key that links the participants’ codes with their names. Consent would not be required for projects where researchers do not have access to the key that links the participants’ codes with their names.

Article 5.6: When secondary use of identifiable information without the requirement to seek consent has been cleared under Article 5.5A, researchers who propose to contact individuals for additional information shall, prior to contact, seek GREB clearance of the plan for making contact.

Article 5.7: Researchers who propose to engage in data linkage shall obtain GREB clearance prior to carrying out the data linkage, unless the research relies exclusively on publicly available information. The application for clearance shall describe the data that will be linked and the likelihood that identifiable information will be created through the data linkage.

Where data linkage involves or is likely to produce identifiable information, researchers shall satisfy that:

- a) the data linkage is essential to the research; and
- b) appropriate security measures are being implemented to safeguard information.