

ACCESS TO PERSONAL INFORMATION FOR RESEARCH PURPOSES PROCEDURE

Background

ECU has a strong commitment to undertaking research in collaboration with industry, government, community groups and community members, to deliver mutual and long-term beneficial outcomes.

ECU's [Privacy Policy](#) sets out the circumstances under which ECU will collect, use and disclose Personal Information.

Requests from researchers to access information relating to, or involving direct recruitment of, ECU Staff or Students for research purposes will be consistent with ECU's [Privacy Policy](#) and this Procedure. Requests may range from the supply of de-identified information (i.e. data that does not identify any individual and where it is reasonable to assume that individuals may not be re-identified), to requests to use ECU Staff or Student information in order to invite participants to a research project.

ECU representatives undertaking institutional analysis, brand research and quality assurance about ECU, which is not considered to be human research, are not bound by this Procedure (see further [ECU's Proportional Review Checklist](#)).

Requests may be made from researchers affiliated with ECU (i.e. Staff and Students) or researchers external to ECU (including external agencies, bodies or individuals). This Procedure is designed to assist in the formal assessment of such requests.

1. Lodging a request for information

- 1.1 Any ECU Staff or Student undertaking a research project involving human participants must complete an ECU [application for ethics approval](#). The application must be submitted to the ECU Human Research Ethics Committee (**HREC**) for approval. Approval must be obtained before requesting participant information.
- 1.2 Any person requesting information, including for the purpose of direct recruitment, who is external to the ECU and undertaking a research project involving human participants, must provide an equivalent of ECU's HREC approval from their relevant institution or business. The equivalent approval must meet the research principles of the [National Statement on Ethical Conduct in Human Research 2007 \(Updated 2018\)](#) (as it is updated or superseded from time to time). The equivalent approval will be assessed by ECU's HREC as part of the review of the request.
- 1.3 A request by a person internal or external to ECU to access information, including for the purposes of direct recruitment, about ECU's Staff or Students for research purposes must be submitted on the **attached** form. The request must include:
 - an outline of the research aims, and the purposes behind the data or information being collected, collated or analysed;
 - details of what data or information will be collected and how collection will occur;
 - details of how data or information will be stored and for how long, who will have access to the data or information, how confidentiality will be protected, and how data or information will be disposed of, destroyed or deidentified when no longer required;
 - copies of any information to be given to potential participants (e.g. information letter, consent form);
 - copies of any proposed data collection instruments (e.g. questionnaire, survey or interview questions); and
 - for research projects involving human participants, a copy of the relevant HREC approval or equivalent.

Access to Personal Information for Research Purposes Procedure

- 1.4 The request to access information must be submitted in the first instance to the Relevant Privacy Officer (or their nominee), namely the:
- Director, Human Resource Services (where the relevant Personal Information or data is about an individual in their capacity as an ECU Staff member);
 - Director, Student Administration (for requests to contact Students for participation in studies, or where the relevant Personal Information or data is about an individual in their capacity as a Student or prospective Student);
 - the Director, Research Services (where the relevant Personal Information or data is about an individual in their capacity as a Student or prospective Student); and
 - Director, Strategic and Governance Services Centre (for requests to use other Personal Information or data).

The Relevant Privacy Officer or their nominee may seek assistance from relevant ECU Staff when determining the response to the request.

2. Reviewing a request

2.1 ECU will give priority to supporting ECU researchers.

2.2 The Relevant Privacy Officer (or nominee) will review requests to ensure that:

- data collection methods are appropriate, having regard to the scale of data being collected, the timing of the request, and whether the data collection activity will have any negative effect on ECU's primary data collection activities and core functions and activities;
- data collection is not for commercial gain, unless there is a tangible benefit for ECU (where it is unclear if a commercial gain or tangible benefit may be derived, the request may be referred to the appropriate ECU Staff member for clarification);
- the workload involved in providing the data or assistance is not excessive, or the proposal contains appropriate provision for this;
- the proposed collection, use, disclosure, retention and disposal is consistent with ECU's [Privacy Policy](#), research policies, and confidentiality and legal obligations; and
- any relevant safeguards can be established.

2.3 In reviewing requests, the Relevant Privacy Officer (or nominee):

- will, wherever possible, consult with the persons responsible for collecting, or being the custodian of, the relevant data or information;
- will consider whether it is appropriate to have ECU Staff or Students participate in the activity for which data or information is sought (e.g. there may be a benefit for future ECU research);
- for a research project involving human participants, will liaise with an Ethics Support Officer from ECU's Research Ethics Team, to assess any ethics approval that has been provided from the researcher's parent institution, and to determine whether any further review, documentation or approval by the ECU HREC is required; and
- may seek expert advice from relevant ECU Staff including the Strategic and Governance Services Centre, Human Resource Services, Student Administration or Student Life - a review of the data collection instruments (e.g. survey, questionnaire, interview questions) may be necessary to prevent duplication of effort amongst areas, unnecessary communications with Staff and Students, ensure conformity to policies, procedures and approvals, and to ensure that data collection methods are suitable.

2.4 If the request is approved, the Relevant Privacy Officer (or nominee) will issue a letter of approval. If the request is rejected, the Relevant Privacy Officer (or nominee) will advise the researcher of the decision in writing. A copy of any approval or rejection given will be sent by the Relevant Privacy Officer (or nominee) to research.ethics@ecu.edu.au. An approval may include conditions reasonably determined by the Relevant Privacy Officer, in particular relating to safeguards that may be necessary to protect personal information or data.

Access to Personal Information for Research Purposes Procedure

2.5 Any approval granted will require that:

- personal or contact details of ECU Staff or Students will not be provided by ECU to the researcher, under any circumstances, without the relevant Staff or Student's express consent;
- initial and continued participation in the research by ECU Staff and Students will at all times be voluntary and participants will be free to withdraw at any time; and
- an invitation to participate in research will be sent by a nominated ECU Staff member to relevant Staff or Students:
 - for ECU research, the ECU researcher may be authorised to be the nominated Staff member; and
 - for external research, the notification will be sent by a nominated ECU Staff member on the external researcher's behalf.

2.6 The use of global email to identify participants, or to survey ECU Staff or Students, is subject to University approval by a member of ECU's University Executive.

2.7 The use of ECU's social media accounts to identify participants for research must be aligned with ECU's social media strategy and must be approved in writing by the Director, Brand and Marketing (or nominee), with any associated costs to be borne out of the relevant research project.

ACCESS TO ECU STAFF OR STUDENTS PERSONAL INFORMATION FOR RESEARCH PURPOSES

PROJECT DETAILS					
TITLE OF PROJECT:					
TYPE OF PROJECT: (please tick)					
Staff Research	<input type="checkbox"/>	Masters (Coursework)	<input type="checkbox"/>	Doctorate/PhD	<input type="checkbox"/>
Honours	<input type="checkbox"/>	Masters (Research)	<input type="checkbox"/>	Other:	

CHIEF INVESTIGATOR	
Name:	
Title:	
Degrees/Qualifications:	
University & Faculty/Division/School:	
Address:	
Mobile:	
Work number:	
Email Address:	
Supervisor (for Student projects):	

ETHICS APPROVAL	
Name of Human Research Ethics Committee (HREC):	
Name of HREC contact person:	
Ethics approval number (if applicable):	
Duration of ethics approval:	From: To:

Access to Personal Information for Research Purposes Procedure

PROJECT AIMS

Please describe the aims of the project below, details about the target cohort (for example, who will be recruited, from what schools, specialties or disciplines, and how many persons are required), and details about how the information collected will achieve the project objectives:

STAFF INVOLVEMENT

Please indicate what assistance from Student Administration/Human Resources Services/Payroll/Research Services is required in order to access data, recruit participants or collect data.

DATA AND INFORMATION TO BE COLLECTED

Please indicate below what data is to be collected and how data collection will be conducted. Please attach the following:

- A copy of any information regarding the project to be sent to participants e.g. information letter and consent form.
- A copy of any data collection instruments e.g. survey, questionnaire, interview questions.

Access to Personal Information for Research Purposes Procedure

SECURITY AND MAINTENANCE OF CONFIDENTIALITY

Please indicate:

- who will have access to the data or personal information
- how long will data or personal information be stored
- the form in which personal information, data or samples collected from participants will be stored during the research project (individually identifiable, re-identifiable, or non-identifiable)
- location of storage and regulations pertaining to this storage
- precautions that are being undertaken to ensure the security of person information, data or samples collected from participants
- how data or personal information will be disposed of, destroyed or deidentified when it is no longer required

Attachments

Information Letter to Participants	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Consent Form	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Data Collection Instruments (e.g. survey, questionnaire, interview questions)	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
HREC approval (or equivalent documentation)	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
Other approvals (e.g. University Executive approval, Director, Brand and Marketing approval), if applicable (select No if not applicable)	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>

Access to Personal Information for Research Purposes Procedure

DECLARATION

As the Chief Investigator, I declare that:

- if the research project involves human research, it will be conducted in the manner approved by the relevant Human Research Ethics Committee (or equivalent), which includes any approved amendments to the research design or any specific conditions of approval;
- any identifiable or potentially identifiable data, information or samples collected from or about participants will not be used for any other purpose or released to any third party not specified in the approved application, without the participant's consent;
- data, personal information or samples will be stored securely, and the confidentiality of all data, information or samples collected from or about participants will be maintained; and
- any further changes to research design, timeline or investigators will be notified in writing to ECU and any relevant Human Research Ethics Committee (or equivalent).

Chief Investigator:

Name

Signature

Date

Please send this completed form to ECU's Relevant Privacy Officer:

Description	Contact Position	Contact Person	Contact method
Access to staff information	Director, Human Resource Services	Ms Jenny Robertson	j.robertson@ecu.edu.au
Access to student information	Director, Student Administration	Mr Peter Corbett	p.corbett@ecu.edu.au
Access regarding individuals as research subjects	Director, Research Services	Professor Margaret Jones	margaret.jones@ecu.edu.au
Other	Director, Strategic and Governance Services Centre	Ms Jo Quinn	j.quinn@ecu.edu.au

ECU DECISION (for internal use only)

Relevant Privacy Officer:		<input type="checkbox"/> Director Human Resources (or nominee) <input type="checkbox"/> Director Student Administration (or nominee) <input type="checkbox"/> Director Strategic Governance Services (or nominee) <input type="checkbox"/> Director Research Services (or nominee)	
Name and signature of Relevant Privacy Officer (or nominee):			
Approved	<input type="checkbox"/>	Not Approved	<input type="checkbox"/> Date:
Notes / Relevant Information / Reasons:			