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## **CHAPTER TWO**

### **THE MORE THINGS CHANGE, THE MORE THEY STAY THE SAME: THE TCPS2 AND THE INSTITUTIONAL ETHICAL OVERSIGHT OF SOCIAL SCIENCE RESEARCH IN CANADA**

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**T**he current system of research ethics oversight in Canada and elsewhere is not working. Variouslly characterized as ‘broken,’ ‘in crisis,’ and ‘using a sledgehammer to crack a nut’ (Gunsalus et al., 2007; McCullough, 2010), it is clear that the research ethics juggernaut has taken on a life far beyond what was initially anticipated by its creators. No one is more cognizant of this than social scientists, who have observed that the ethics-review system was designed for biomedical research, there is no evidence that it makes social science research more ethical (and some evidence to suggest precisely the opposite), and that it is leading to an insidious and unnecessary impoverishment of social science research (e.g., Haggerty, 2004; Bledsoe et al., 2007; Schrag, 2010; van den Hoonaard, 2011).

In light of the limitations of prevailing models, efforts have been recently made to improve systems of research ethics oversight in several countries. The Department of

Health and Human Services, the institution that oversees the Office of Human Research Protections (OHRP) in the USA, has proposed sweeping changes to the national framework that would exempt several types of social science research from institutional ethics review. It would also create allowances for self-exemptions and remove continuing review requirements for minimal-risk research, among other changes (DHHS, 2011). However, whether the proposed changes will ultimately be implemented, and in what form, remains an open question. Other countries have tried to improve ethics review processes by refining their existing guidelines and frameworks. In Canada's case, the national human research ethics guidelines, the *Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS2)*, underwent a major overhaul in 2010.

Five years into the *TCPS2* era, the changes to Canadian human research ethics guidelines have done little to curb the excesses of institutional research ethics oversight. Indeed, in some respects they have inadvertently served to make the situation worse. In providing an overview of the limitations of the *TCPS2*, I aim to demonstrate that nothing short of a radical overhaul of the current system will resolve the underlying issues. Finally, I provide some suggestions as to the form this new structure might take.

### **Overview of the *TCPS* and the Governance of Research Ethics in Canada**

The Canadian system of research ethics oversight bears a number of similarities – but also some important differences – to the systems in place in other countries. Until the 1990s, different universities had their own systems for reviewing the ethical implications of research, although they were guided by the individual guidelines disseminated by the

three federal granting agencies (known as the Tri-Council): the Medical Research Council (now the Canadian Institutes of Health Research), the National Sciences and Engineering Research Council, and the Social Sciences and Humanities Research Council. In 1994, the Tri-Council began a process to develop a shared set of policies and guidelines regarding human research ethics; the resulting 1998 *Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans* (CIHR et al., 2005) was more encompassing, standardized, and prescriptive than the guidelines that preceded it (Dehli and Taylor, 2006).

Unlike the system in the USA, the Canadian framework was not a regulatory one – the *TCPS* was framed as a policy document rather than a legal one (van den Hoonaard, 2011). However, any institution that wished to be eligible to receive funding from the Tri-Council agencies had to sign a Memorandum of Understanding agreeing to abide by the *TCPS*, which mandated the establishment of a research ethics board (REB) to subject all research with human subjects to up-front review. Importantly, the *TCPS* required that *all* research pass ethical muster in order for universities to continue to receive funding from the Tri-Council, regardless of whether any given study was federally funded (van den Hoonaard, 2011). Thus, unlike the United States, which gave academic institutions the choice of whether to extend oversight beyond federally funded research<sup>1</sup> (see Plattner, 2006; Shweder, 2006), Canadian institutions wanting federal funds had no say in the matter.<sup>2</sup>

From its inception, many social scientists were critical of the underlying biomedical orientation of the *TCPS*, while others argued that it was more inclusive of

social science research than generally presented (e.g., Ells and Gutfreund, 2006). In 2001, the Tri-Council created the Interagency Advisory Panel on Research Ethics (PRE), and improving the *TCPS* became its major focus during the next decade (van den Hoonaard, 2011). This period saw the creation of numerous working groups tasked with tackling the major areas of the document requiring revision, and culminated in the publication of a draft version of the *TCPS2* in 2008, and the publication of a revised draft in 2009, which were circulated for public comment. Responses to the public consultation were incorporated into the final guidelines that came into effect in December 2010 (CIHR et al., 2010).

### **Framing Research**

The first chapter of the *TCPS2* sets up the conceptual framework for the guidelines and has several features worth highlighting. First, while acknowledging the existence of different types of research in the social sciences, humanities, natural sciences, engineering, and health sciences, the framework treats research as a singular phenomenon with an instrumental purpose, stating: ‘There can be no doubt that research has greatly enriched and improved our lives . . . A fundamental premise of this Policy is that research can benefit human society’ (CIHR et al., 2010: 7). As the Society for Academic Freedom and Scholarship (SAFS, 2010) notes, central to this conception of research is the assumption that good research produces certain concrete positive outcomes.

This instrumental approach to research aligns with the objectives of the Tri-

Council agencies themselves, including the Social Sciences and Humanities Research Council, which is increasingly committed to funding studies directed toward solving ‘economic, social and cultural challenges and problems’ (Dehli and Taylor, 2006: 105). However, as Richard Shweder (2006: 515) notes, ‘Although federal funding agencies may define their funding mission and justify it to Congress and the public on that basis (and although that standard may be appropriate for certain kinds of biomedical research), it is a misguided norm for a research university.’ Especially in the social sciences and humanities, scholars often engage in research because they are intellectually curious about a topic; moreover, they may be interested in topics that the public finds upsetting, or thinks are not particularly beneficial for society (Shweder, 2006). It thus seems problematic that federal granting agencies get to determine the scope of what constitutes legitimate research. As Gustavo Lins Ribeiro (2006: 530) asks: ‘Should the state be the keeper of supposedly universal ethical standards of knowledge production? No, most scholars would agree.’

However, as Ribeiro (2006) points out, institutional ethics-review processes are merely the ‘tip of the iceberg.’ Therefore, it is important to situate these developments within larger transformations in the academy, especially the rise of the ‘managed university,’ which has seen institutional autonomy and academic freedom fundamentally reworked<sup>3</sup> (Marginson, 1997). In this environment, academics are increasingly being refashioned as entrepreneurial subjects, encouraged to direct their efforts toward social and economic issues: the master frame is that of ‘knowledge mobilisation’ and ‘knowledge transfer’ (Dehli and Taylor, 2006). Thus, academics pursue a kind of

regulated freedom, with most forms of knowledge ‘produced on terrain which – though it is not directly administered by governments – is ordered and sanctioned by them’

(Marginson, 1997: 361).

### **Risky Business**

Another key feature of the framing of research in the *TCPS2* is its characterization of research as an intrinsically risky enterprise:

Research is a step into the unknown. Because it seeks to understand something not yet revealed, research often entails risks to participants and others. These risks can be trivial or profound, physical or psychological, individual or social. History offers unfortunate examples where research participants have been needlessly, and at times profoundly, harmed by research, sometimes even dying as a result (CIHR et al., 2010: 7).

As Kari Dehli and Alison Taylor (2006) point out, it is noteworthy that the *TCPS* fails to include a category of ‘no risk’ research, although various types of social science research conceivably fall into this category. Moreover, these statements present research risks as differing in *degree* rather than in *kind*; psychological and social risks are mentioned in the same breath as physical risks, and trivial risks are mentioned in the same breath as profound ones.

Beyond framing research as a harm that is only justified if it is conducted for the good of society, it also sets up an intrinsic tension between the interests of researchers and participants – an ‘adversarial culture’ as Mark Israel et al. (Chapter 1, herein)

describe. The *TCPS2* states,

The importance of research and the need to ensure the ethical conduct of research requires both researchers and REB members to navigate a sometimes difficult course between the two main goals of providing the necessary protection of participants and serving the legitimate requirements of research. (CIHR et al, 2010: 11)

In this conceptualization, the interests of researchers are fundamentally in opposition to the interests of research participants. Therefore, research subjects must be ‘protected’ from researchers. As Will van den Hoonaard (2011) points out, this framing undercuts the notion of the moral agency of researchers. Thus, while these framing statements assert a series of truth claims in which ‘culturally specific notions of “the subject” are naturalised and instrumentalised’ (Dehli and Taylor, 2006: 112), with human subjects appearing to possess conditional reason, they *also* assert a series of truth claims about researchers. In this framing, researchers, too, possess conditional reason. Ostensibly driven by our own lust for knowledge, career advancement, and other personal gain, we are seen as being incapable of recognizing the ethical issues our own research poses to participants.

### **Paved with Good Intentions**

Although the *TCPS2* suggests a unitary framework for all research, various accommodations for social science and humanities research have been made throughout the document. Some of these changes are superficial and largely symbolic, serving to demonstrate an inclusive attitude toward social science research. The shift from ‘human

subject' to 'human participant' is one such change (see Gontcharov, herein, Chapter 18). Thus, the *TCPS2* states: 'This Policy prefers the term 'participant' because it better reflects the spirit behind the core principles: that individuals who choose to participate in research play a more active role than the term 'subject' conveys. As well, it reflects the range of research covered by this Policy ...' (CIHR et al., 2010: 16). However, it is worth noting that the switch in terminology has come under fire, as commentators point out that there are numerous studies where human participants are indeed the subjects of research rather than active participants in it (e.g., Leslie and Leahy, 2010).

A second more substantive change is the definition of research outlined in the *TCPS2*. According to the original *TCPS*, '[r]esearch involves a systematic investigation to establish facts, principles or generalizable knowledge' and social scientists saw this as yet further evidence of the clinical and quantitative bias of the document. These problems were explicitly acknowledged and addressed by the working group set up to revise the definition of research, which observed that 'These terms may not be sufficiently flexible when transferred to a broader context that includes humanities and social sciences activities in which research does not necessarily rely on hypothesis testing' (Progroup, 2008: 2). Consequently, the revised definition of research outlined in the *TCPS2* states: 'Research is an undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation' (CIHR et al., 2010: 15). As should be evident, the term 'generalizable knowledge' has been removed and the concept of research now hinges on the notion of intent.

While many social scientists initially applauded this change, I have come to the

conclusion that in the absence of a more meaningful restructuring of ethics review processes, it is doing more harm than good. The problem is that the definition of research is now so broad and encompassing that virtually everything is included in its scope. In Jack Katz's (2006) view, the older definition of research provided ethnographers and other qualitative researchers with ethical escape routes. In his words: 'Read as limited to investigations that are systematically designed, as that concept is understood within the traditional rhetoric of science, the 'research' governed by IRBs would not cover the unsystematic, constantly changing, informally devised methods of ethnographic fieldwork' (p. 503). However, the *TCPS2* has effectively blocked this interpretation of the rules.

An atmosphere of uncertainty about which studies require institutional ethics review has become even more acute in the *TCPS2* era. Although the *TCPS2* does list some research exemptions, these exemptions are very conservative, including only research with publicly available data, naturalistic observation in public places, and secondary use of anonymously collected data. Thus, the breadth of the new definition of research, combined with the well-documented conservatism of research ethics administrations (Shweder, 2006; Bledsoe et al., 2007; van den Hoonaard, 2011), promotes ethics creep, serving to justify the colonization of new groups and practices (Haggerty, 2004: 394). For example, Canadian research ethics administrators and boards are now grappling with the question of whether researchers who wish to draw on autobiographical anecdotes in publications are required to undergo institutional research ethics review.

Another major change is that the *TCPS2* includes a new chapter on qualitative research, addressing studies with an emergent design, obtaining consent in qualitative research, consent for naturalistic observation, disclosing participant identities, and obtaining ethics approval for data collection. While this chapter does pose some important caveats regarding the review of qualitative research, when read in the context of the larger document there seems to be limited scope in which to fundamentally shift the standard requirements around informed consent, up-front review, etc., that contribute to the mismatch between the level of specificity typically required in the ethics review process and the information that qualitative researchers can legitimately provide.

For example, Article 10.5 states that ‘In studies using emergent design in data collection, researchers shall provide the REB with all the available information to assist in the review and approval of the general procedure for data collection’ (CIHR et al., 2010: 144) and the application section recognizes that elements of the study may evolve as the project progresses. However, although stating that researchers should not be forced to provide REBs with final versions of interview guides, etc., in the initial review, the reader is informed that: ‘Final versions should be submitted as soon as they become available.’ Beyond the question of whether an interview guide is ever really final in many types of qualitative research, the ability to provide *any* documentation at all of interview content is a fundamentally artificial exercise in the context of the unstructured conversations that characterize forms of qualitative research such as long-term anthropological fieldwork (*IRB Advisor*, 2006).

## **One Step Forward, Two Steps Back**

There is a clear reluctance within the *TCPS2* to fully commit to changes in policy regarding issues with particular pertinence for social science research. Thus, whenever appearing to take a stance on such issues, the *TCPS2* immediately goes on to undermine it. Consider, for example, the concept of proportionate review. Article 2.9 of the *TCPS2* states:

The REB shall adopt a proportionate approach to research ethics review such that, as a preliminary step, the level of review is determined by the level of risk presented by the research: the lower the level of risk, the lower the level of scrutiny (delegated review); the higher the level of risk, the higher the level of scrutiny (full board review) (CIHR et al., 2010: 24).

This emphasis on proportionate review is reiterated in Article 6.12 of the chapter on research ethics governance. However, the application section of Article 6.12 goes on to state that: ‘Research ethics review by the full REB should be the default requirement for research involving humans’ (CIHR et al., 2010: 77). Establishing full board review as the standard inhibits precisely the sort of ‘proportionate approach’ the *TCPS2* advocates, because delegated review is implicitly treated as an exception to the norm.

This is a consistent pattern throughout the *TCPS2*, where processes affecting the review of social science research are set up as exceptions that require justification. For example, a topic that often poses particular challenges for social scientists is informed consent. At several points, the *TCPS2* states that a variety of ways of obtaining informed consent exist that do not boil down to a signed consent form (see Articles 3.2 and 10.2).

For example, Article 10.2 states: ‘Under a variety of circumstances, signed written consent is not appropriate in qualitative research.’ But the application section immediately goes on to note that: ‘However, where there are *valid reasons* for not recording consent through a signed written consent form, the procedures used to seek and confirm consent must be documented’<sup>4</sup> (CIHR et al., 2010: 140, emphasis added). This clause sets up signed consent forms as the norm, and suggests that exceptions to written consent must be justified. Moreover, the vagueness of terms ‘valid reasons,’ and ‘justified’ leaves it up to the individual board to determine whether the researcher’s reasons are, in fact, valid and adequately justified. The end result is a position virtually indistinguishable from *TCPS1*, which allowed for exceptions to signed consent when ‘...there are good reasons for not recording consent in writing’ (CIHR et al., 2005: 2.1).

A similar issue plagues the discussion of the elements of informed consent in Article 3.2: ‘Researchers shall provide to prospective participants, or authorized third parties, full disclosure of all information necessary for making an informed decision to participate in a research project’ (CIHR et al., 2010: 30). This suggests that the information provided to participants should be tailored to the specifics of the project, a position affirmed in the application section, which states that not all the standard disclosure elements are required for all research. Theoretically, this helps resolve the issue of lengthy consent documents containing numerous clauses about wholly irrelevant and inappropriate study risks. However, this stance is immediately undermined in the following sentence: ‘If a researcher does not include some of the listed disclosure requirements, they should explain to the REB why these requirements do not apply to that

particular project' (p. 30). Once again, alternatives are set up as deviations from the default process that require justification.

### **Policy versus Practice**

Even if the *TCPS2* was a gutsier document, this would still not resolve the underlying issues that have long plagued research ethics oversight. The fundamental problem relates to the ways the guidelines are *interpreted* by administrators and research ethics boards (van den Hoonaard, 2011). Carolyn Ells and Shawna Gutfreund argued that the original *TCPS* was not as conservative as social scientists often assumed, and they pointed out that the document did allow for alternative modes of consent, exceptions to anonymity rules, etc. In their view, the problems lay in its 'interpretation and application' (Ells and Gutfreund, 2006: 361). Joan Sieber et al. (2002: 2) have made similar points regarding the regulations in the USA, noting that local review boards 'interpret the requirements of the Common Rule in a manner more appropriate to high risk biomedical research, ignoring the flexibility available to them in the Common Rule.'

However, while these national frameworks do theoretically accommodate difference, such flexibility is fundamentally counter to the nature of review boards themselves. First, boards are bureaucratic entities, with a tendency toward the proliferation of rules and processes (Haggerty, 2004; van den Hoonaard, 2011). As Bruce Kapferer (1995) has noted, central to the taxonomic schemes that characterize bureaucracy is an attention to surface features that subdue and subsume difference, a process he defines as 'bureaucratic erasure.' Second, the fundamentally conservative

nature of research ethics boards themselves also hinders flexibility. In the words of Caroline Bledsoe et al. (2007: 612), '[t]errified at the specter of their institutions losing all federal funds, [IRBs] opted overwhelmingly for conservatism .... They began to convert choice to requirement, treating the guidelines as rules....' Indeed, REBs have a tendency to treat the available guidelines as a minimum standard, often placing additional requirements on top of those outlined in formal policies (van den Hoonaard, 2011; Israel and Hay, 2006) and viewing these stiffer rules as 'virtuous' (Hamilton, 2002). As ethnographic research has also shown (e.g., Stark, 2006; Mark Israel et al., Chapter 1, herein), REBs tend to place considerable emphasis on the need to make locally consistent decisions over time (whether they actually succeed in this is an open question). There is thus a strong concern with local precedents among REBs that shape REB members' remedies to ethical concerns and also guide the problems that they read into proposals in the first place (see Stark, 2006: 227). There is no reason to believe that REBs will function any differently in the *TCPS2* era.

Finally, it is important to note that developing guidelines that accommodate social science research does not actually resolve the issue of the lack of methodological expertise on REBs, a persistent problem. As Ted Palys and John Lowman (2010) ask, '... will creating a chapter on qualitative methods make the experimentalist from computing science or psychology an authority on qualitative method ethics issues?' Simply adding more social scientists to REBs, or creating separate social science and behavioral REBs, is not necessarily the answer. Social science is a vast field including an array of theoretical and methodological approaches. According to Rena Lederman<sup>5</sup> (2004: 2),

‘Part of the problem is that disciplines have diverse research cultures: distinct, sometimes contradictory ethical practices underwrite knowledge claims in the humanities, social sciences and biomedicine (with important differences even within those categories).’

Different disciplinary traditions mean that approaches to qualitative research, even named approaches such as ‘ethnography’ and ‘phenomenology’, look rather different depending on the background of the researcher. There is a real danger that certain styles of ethnography (or phenomenology or grounded theory, etc.), especially those more amenable to established procedural guidelines, will become the standard against which other forms of ethnographic fieldwork are measured (van den Hoonaard and Connolly, 2006; van den Hoonaard, 2011).

### **Where to from here?**

If we accept that the *TCPS2* has not resolved the fundamental problems connected with institutional research ethics oversight in Canada, it is important to acknowledge that improving the present environment requires some changes in our own mindset as well. Although the problems with research ethics governance are sometimes portrayed as a conflict between administrators and academics, Bruce Kapferer (1995) argues that it is important to avoid simple oppositions that separate the thinking and practice of administrators from those of the people to whom they attend. While many research ethics administrators remain committed to the prevailing system, and unquestioningly parrot the party line (Fitzgerald, 2004), a number are also well aware of the system’s limitations (see Bledsoe et al., 2007; van den Hoonaard, 2011). In the words of Caroline Bledsoe et

al. (2007: 616-17), 'IRB staff have sometimes had to step in diplomatically to rescue a project from a zealous social-science faculty panelist threatening to dismember it altogether.' As they observe, the critical impulse among academics, bred into us through endless rounds of reviewing research proposals, journal articles, and student papers, tends to make for fastidious REB members prone to find fault with the submissions they receive.

Empirical studies with academic anthropologists and sociologists (e.g., Taylor and Patterson, 2010; Wynn, 2011) have also shown that many social scientists see ethics oversight as a necessary evil, despite considerable concerns about the overarching system. For example, several years ago I had a conversation with a psychologist colleague about some of the problems with research ethics oversight. At the end of our discussion, he said something along the lines of 'yes, but look at Tuskegee,' as if this conclusively settled the matter. In this framing, research ethics oversight is necessary, not for ourselves, but rather for some vaguely defined, dangerous Other who would be out there committing rampant abuses if not held in check through a formalized review process.

A related problem is that of academic passivity and our tendency to accept systems of audit and accountability that are a poor fit with our research, and I speak here not only of systems of institutional ethics oversight but growing moves to quantify research output based on positivistic models, and a variety of other initiatives with noticeably corrosive effects on social science scholarship. While many social scientists have perfected the art of 'principled dodging' (Bledsoe et al., 2007), it is questionable

whether these tactics ultimately serve our interests. As Rena Lederman (2007: 33) notes of anthropologists who simulate compliance with the regulatory ideal, ‘. . . it doesn’t help IRBs really understand what ethnographers actually do’ and contributes to misinformation about ethnographic fieldwork (cited in *IRB Advisor* 2006: 103). According to Gustavo Lins Ribeiro (2006: 530), if researchers want to guarantee academic freedom, they need to ‘do politics’ within and beyond their institutions. ‘If they do not, other people will, and sooner or later researchers will see themselves caught within other people’s webs of stereotypes and regulations’.

### **Potential Models**

Many possible models could be adopted for social science research in Canada. One model would be an exemption system along the lines of what is currently being proposed by the OHRP in the United States, where various types of social science research would be exempt from institutional ethics oversight altogether. Following the proposed OHRP model, the current Canadian exemptions could be expanded to include all surveys, interviews, and similar procedures done with competent adults, along with other specified categories of social science research (e.g., oral histories). However, as the American Anthropological Association (AAA, 2011: 3) cautioned in its response to the proposed model, one of the limitations of the exemption system is that such ‘List-making results in a welter of qualifications and addenda that engender freshly conflicting interpretations and further caution-motivated full board reviews.’

Similar to the model advocated by the AAA, the definition of research could be

dramatically reined in to focus specifically on biomedical research and other procedures involving risks of physical harm to participants and/or experiments or other methodologies where results depend on limiting or controlling information available to research subjects (AAA, 2011). There is some precedent for this framework in Canada; a 2004 report for the PRE by the Social Sciences and Humanities Research Ethics Special Working Committee advised:

PRE should consider exemptions from review for social science and humanities research that involves standard practice in the discipline involved, particularly in these situations: where the research participant is not a ‘human subject’, where there is no identifiable harm, and where the provisions of confidentiality ensures that participants cannot be identified’ (SSHWC, 2004: 6-7).

Social scientists would still be expected to follow the *TCPS2* guidelines, and their own disciplinary codes of ethics, but would not be required to submit any documentation to their ethics board in order to proceed with their research.

This is not to suggest that some formal discussion of and reflection about research ethics is unwarranted. Such conversations are clearly important and necessary, although evidence suggests that they can occur most effectively when removed from the context of bureaucratized institutional oversight. As numerous scholars have noted, discussions of research ethics invariably focus on getting *through* the ethics *process*, which tends to crowd out ‘real’ conversations about ethics (Lederman, 2007; van den Hoonaard, 2011; see also van den Scott, herein, Chapter 15). Disciplines should provide appropriate education in research ethics by incorporating it into key courses. Graduate students in the

social sciences should be required to explicitly consider ethical issues when developing research proposals and be asked to reflect on such issues as they undergo their thesis defense. After all, it is often in the writing period that ethical issues become apparent in social science research.

### **Conclusion**

At this stage, it is clear that the problems with ethics review of social science research go beyond isolated incidents. According to Zachary Schrag (2010: 9), the malfunctions result not just from operator error but also from design flaws inherent in the machine. While the *TCPS2* has softened the sharp edges, this has not resolved the fundamental mismatch between the ethics review process and social-science methods and epistemologies.

Scaling back research ethics oversight will not be easy. At this stage, it has become enmeshed with institutional policies, funding frameworks, and publication requirements.<sup>6</sup> Thus, rethinking systems of oversight will require coordination and cooperation at all levels. This will necessitate collective effort on the part of social scientists, as well as a willingness on the part of federal bodies and local institutions to rethink the current framework. However, we appear to have reached an important historical moment in which such change has become *thinkable* in a way that was not the case a decade ago and we should not let this opportunity pass us by.

### **NOTES**

<sup>1</sup> As Richard Shweder (2006) points out, the situation in the United States was more complicated than this because although the Federal government gave universities the option of limiting IRB oversight to federally funded studies, most administrators extended IRB oversight because they presumed this is what federal regulators wanted. It is also worth noting that the proposed changes to the Common Rule would remove the possibility of exempting unfunded studies from IRB oversight.

<sup>2</sup> Although the Canadian Society for Academic Freedom and Scholarship (SAFS, 2010) has challenged the legal basis of this blanket fiat, they have not to date received a satisfactory response from the PRE about its mandate concerning unfunded research.

<sup>3</sup> It is also related to the emergence of audit culture, and the rise of rituals of verification that, rather ironically, perpetuate the very mistrust they are designed to dispel (Strathern, 2000; see also Robert Dingwall, herein, Chapter 6).

<sup>4</sup> Interestingly, the first draft version of the *TCPS2* did not contain this clause, suggesting a trend toward greater conservatism with each subsequent iteration.

<sup>5</sup> See also Rena Lederman (herein, Chapter 8), for further discussion of issues of cross-disciplinary translation.

<sup>6</sup> See Will C. van den Hoonaard (2011) for a discussion of the ways that regimes of institutional ethics oversight have become tied up with publication requirements.

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