

BC Research Ethics Guidance: Public Health Surveillance

BACKGROUND

1. On March 18th, 2020, the pandemic known as COVID-19 was declared as a public health emergency for British Columbia (BC).
2. Public health surveillance activities can raise questions about whether they require a Research Ethics Board (REB) review when conducted in a health authority or using health authority data.
3. To ensure a streamlined approach in research ethics, this Guidance is intended to support REB offices and members when considering activities pertaining to public health surveillance.

DEFINITIONS

Each of the following terms has the meaning ascribed to it in this Section, unless otherwise specifically provided:

4. "Research Ethics Board" or "REB" is a body of researchers, community members, and others with specific expertise (e.g., in ethics, in relevant research disciplines, etc.) established by an institution to review the ethical acceptability of all research involving humans conducted within the institution's jurisdiction or under its auspices.
5. "Public health surveillance" is the systematic collection, analysis, and interpretation of health-related data for the planning, implementation and evaluation of public health practice. Source: Panel on Research Ethics https://ethics.gc.ca/eng/policy-politique_interpretations_scope-portee.html
6. "Research" is an undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation. https://ethics.gc.ca/eng/tcps2-eptc2_2018_chapter2-chapitre2.html#a

ETHICAL OVERSIGHT REB REVIEW

1. The Panel on Research Ethics (PRE) has provided an interpretation under the topic of Scope of research ethics review, and states: "activity that is conducted in support of a public health program or under the jurisdiction of a public health authority *and that does not have research as a primary goal*, does not fall within the TCPS2 definition of research and does not require REB review." (see point 11 from [PRE Interpretations of Scope](#))
2. Surveillance of public health activities stemming from the public health emergency are not subject to REB review if the primary purpose of those activities is not research.
3. Additionally, if the surveillance is initiated from the BC Centre for Disease Control (BCCDC) it will have been developed having taken into consideration the ethical considerations, described in their [Ethics Framework Decision Making Guide](#) and recently, the [COVID-19 Ethical Decision Making Framework](#).

RECOMMENDATION

In accordance with the provisions of the TCPS2 2018, Research Ethics BC endorses the interpretation of the Panel on Research Ethics that public health surveillance activities that do not have **research as a primary goal**, should not be required to undergo a research ethics review. If a project that meets the definition of public health surveillance is submitted to a research ethics board, the REB should advise the project investigators that REB review is not required in accordance with this Guidance and the provisions of the TCPS2 2018.

If the project investigator wishes to have a REB review in cases where research is not a primary goal of the surveillance activity, it is up to the research ethics board to determine if it has the capacity to conduct the review.

A review conducted at the request of a public health surveillance investigator that is not required under TCPS2 2018 would not require the harmonized Rapid Review process for COVID-19 clinical studies. A review of public health surveillance activities where research is a primary goal, should be reviewed according to normal REB process, as a harmonized review for BC multi-jurisdictional research, [or Rapid Review for COVID-19 studies where the study is deemed to be urgent](#).