

Guidelines for Research Activities at King’s University College during the COVID-19 Pandemic

Due diligence must be taken to minimize the risk of infection with COVID-19 resulting from involvement in official King’s research activities.

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Preamble

Since March 2020, the King's community has demonstrated resilience, courage, and ingenuity in our efforts to protect each other from the harmful effects of the coronavirus. The pandemic has required all of us to adapt our behaviors, habits, and practices in all aspects of our lives, including how we conduct academic research.

The primary aim of this document is to help research teams at King's protect participants and themselves from the risk of infection with COVID-19 during research activities by helping researchers decide when and how people (research team members and/or participants) can gather together in-person for research activities.

One way to achieve this is to help ensure research teams are designing research activities and arranging research spaces (on-campus or off-campus) in accordance with public health directives issued by the Province of Ontario and the Middlesex-London Health Unit. This document also closely aligns with guidance provided by Western Research at Western University ([here](#) and [here](#)). Given that King's has a different governance structure than Western, and given that there can be important differences in the types of research activities supported by each institution, it seemed prudent to provide King's-specific guidance for the remainder of the pandemic. King's will continue to work closely with Western for the remainder of the pandemic to ensure both institutions continue to operate as safely as possible and comply with all pandemic directives.

While Ontario's public health directives apply to all organizations operating during the pandemic, much of the guidance is framed in terms of businesses serving customers rather than research teams interacting with participants. This document attempts to 'translate' some of the directives into language more aligned with what research teams at King's do.

If your research would normally require Research Ethics Review Committee (RERC) approval, it is important to keep in mind that decisions about how to carry out (or substitute) in-person research activities may have an impact on informed consent, participant well-being and vulnerability, confidentiality, and anonymity, etc. This document does not provide detailed guidance about how to address specific research-ethics concerns, but it does try to indicate when such issues may arise and tries to identify resources that may be useful. Research teams are strongly encouraged to proactively reach out to King's Research Ethics Review Committee if they are unsure about whether or not a COVID-19 prevention measure may require ethics review/approval.

These guidelines also offer research teams advice on how to create the Provincially mandated "Workplace Safety Plan" document that all workplaces are to have available to all employees and government inspectors upon request for the duration of the pandemic. Given that the work carried out by each research team will be highly specific to the methodologies, location, and design of each study, King's is asking each research team to prepare its own specific Safety Plan and have it available for reference. A King's *Research Safety Plan* template – based on the Province's template – is available to help teams create their own document.

While the Safety Plan document itself merely collects information, creating and regularly reviewing these documents can be a useful exercise for research teams. Creating and reviewing these documents in a collaborative fashion helps ensure that everyone involved understand risks, are aware of the actions being taking to mitigate them, and can voice concerns in a constructive, focused, and safe manner.

We appreciate the hard work that research teams have put into to designing safe research activities since the Spring of 2020 and we look forward to supporting safe research at King's until the pandemic measures are ended by the Middlesex-London Health Unit, the Province of Ontario, and the Government of Canada.

1. Scope and Definitions:

This section aims to clarify what activities this document does and does not intend to provide guidance for.

1) Research:

- “Official King’s research activities” are understood to be “undertaking[s] intended to extend knowledge through a disciplined inquiry and/or systematic investigation¹” conducted by (or under the legitimate direction of) individuals legitimately acting in their official capacity as King’s faculty, staff, or students.
- Other activities – such as teaching/learning – are not covered under the scope of this guidance document.
- The scope of this guidance document is limited solely to risks of infection with COVID-19 an individual *would not have faced had they not been involved in the research activity.*²

2) Essential Research Activities:

- For the purposes of these guidelines, “essential research activities” are understood as follows:
 - Scholarship directly investigating some aspect of COVID-19 that cannot feasibly be investigated retroactively (i.e., once the pandemic is over) using the study’s current methodologies or approaches; **or**,
 - Scholarship where reasonably anticipated serious harms from pausing the study would outweigh the anticipated risks of continuing the study under current COVID-19 conditions (all things considered).

3) King’s University College:

- The guidance here is intended only to guide the activities of research team members employed by King’s.
- Other institutions may have different guidelines:
 - Members of King’s that are collaborating with other institutions must (at minimum) abide by the guidelines issued by all collaborating institutions (not just King’s guidelines).
 - Where multiple institutions are involved, all parties need to mutually agree on the protocols they will follow.
 - Everyone should be prepared to abide by the strictest guidelines in order to ensure all members can participate.
 - No collaborator should feel pressured to go against their own institution’s guidelines where those guidelines are stricter than the guidelines of other involved institutions.

4) Duration

- These guidelines are in effect until the authorities of the Middlesex-London Health Unit, the Province of Ontario, and the Government of Canada have declared an end to COVID-19 public health measures.

¹ TCPS2-2018, Article 2.1: “For the purposes of this Policy, “research” is defined as an undertaking intended to extend knowledge through a disciplined inquiry and/or systematic investigation. The term “disciplined inquiry” refers to an inquiry that is conducted with the expectation that the method, results and conclusions will be able to withstand the scrutiny of the relevant research community.”

² TCPS2-2018, Article 2.10: “Research-Attributable Risk: When describing the foreseeable risks and potential benefits of research involving participants who are also exposed to other risks, researchers should clearly distinguish between the risks that are attributable to the research, and the risks to which participants would normally be exposed. In their evaluation of risk, REBs should evaluate those risks that are attributable to the research.” The same principle is employed here but only in relation to one specific research-attributable risk: risk of infection with COVID-19.

2. Guidelines For Safe and Compliant Research Activities

This section attempts to summarize how the directives aimed at preventing the spread of COVID-19 issued by local public health authorities, the Province of Ontario, and the Government of Canada apply to research activities.

1. **Minimize In-Person Activities:** In-person activities should only take place where virtual alternatives are not possible (including participants' or partners' lack of access to technology due to socio-economic circumstances) or where virtual alternatives would unavoidably compromise the academic integrity of the research. **(Inconvenience or increased duration of projects, considered on their own, are not sufficient to justify in-person activities over virtual alternatives.)**
2. **Public Health Directives:** Follow all up-to-date public health directives and/or guidelines of all relevant public health authorities having jurisdiction over regions where research activities are carried out.
 - 1) If activities cannot be carried out under the restrictions currently in place at the regional, provincial, or federal levels, then the activities must be paused until it is possible to do so under revised restrictions/guidelines issued by those authorities at a later date.
 - 2) Studies considered "essential research" as defined in [Section 1.2](#) may qualify for exemption from pausing *through the expressed approval of the Vice-Principal and Academic Dean (VPAD)*, so long as the research team can demonstrate that there is a clear plan in place to respond to potential or actual infection with COVID-19 that may result from continuing the research activities under current COVID-19 conditions.
3. **Physical Distancing:** Research spaces (at King's or elsewhere) must be arranged in a way that facilitates physical-distancing requirements as outlined by governing public health authorities at the time of the activity. Where physical-distancing is not possible, effective barriers and/or PPE (as outlined in local or provincial health guidelines) must be used by all involved. If barriers and/or PPE cannot be employed without compromising the research, then a pause on research will be required (allowing for an exemption from pausing for "essential research" as outlined in [Section 1.2](#)).
4. **Screening:** All people involved in the research activities should complete COVID-19 screening mandated for faculty, staff, and students at King's (even if they do not fall under one of these categories) or COVID-19 screening [recommended by the Province of Ontario](#).
5. **Contact Tracing:** The lead-researcher(s) should collect and maintain information necessary to carry-out contract tracing for anyone involved in the research activities. Provincial guidance on how institutions can support contract tracing are available at the Province of Ontario's [Develop your COVID-19 workplace safety plan](#). This information may be provided to public health officials should it be discovered that someone capable of infecting others with COVID-19 has been in close contact with others involved in the research.
 - 1) This information should keep track of the name and contact information of each person involved in research activities along with the date and location of the activities.
 - 2) **Care must be taken to preserve all anonymity or confidentiality requirements outlined by King's RERC while also complying with contact-tracing requirements outlined by public-health authorities.** (For example, contract-tracing information should not be linkable to any study data.) **Where researchers believe that the collection of contact-tracing data would be in conflict with requirements for ethical research, they should consult immediately with the RECR.**

6. Travel:

- 1) Consistent with Section 2.1, **travel should be avoided as much as possible.**
 - a) If travel cannot be avoided without compromising the feasibility of the research, and if the proposed travel is allowable under current health guidelines, then travel is permissible but special care must be taken to minimize risk of COVID-19 infection at all times. For example, this may mean using separate vehicles where people normally would have carpoled. Public transportation should only be used where local health authorities have deemed it safe to do so and all instructions for using public transit must be followed.
 - b) If travel cannot be avoided without compromising the feasibility of the research but travel is not allowed under current health directives (Section 2.6.2), **then the study should be paused until those restrictions are revised** (in accordance with Section 2.2.1).
 - c) While COVID-19 public health measures restricting travel are in place, researchers are encouraged to utilize virtual **dissemination** options (ex. virtual conference participation, virtual workshops, etc.).
 - i. If duly recognized authorities (either in Canada or in the country/region of the event) issue advisories against travel to the location of the dissemination event, then researchers are strongly discouraged from traveling to that event and/or inviting participants to travel to that event.
 - ii. For the purpose of these guidelines, travel for dissemination activities is not deemed essential (even for projects deemed “essential research” under Section 1.2). This means that if public health directives are not consistent with in-person dissemination activities, those activities must be either done virtually or postponed until such public health measures are no longer in place.
- 2) All research-related travel must adhere to travel advisories issued by the Government of Canada ([Government of Canada Official Travel Advisories](#)) and/or recognized governing bodies at all potential destinations. Researchers are also asked to respect any restrictions on inter-provincial travel issued by Provinces and Territories (ex. the “Atlantic Bubble”).
- 3) Researchers who travel in contravention of duly issued advisories (Section 2.6.2) are strongly encouraged to consider the potential costs/risks they are taking on.
 - a) King’s will not be able to re-imburse costs (including quarantine costs, cancellation costs, etc.) for travel that was undertaken after advisories restricting travel have been duly issued.
 - b) Travellers are reminded that it is their duty to inform themselves of all restrictions before travelling. Ignorance of the advisories does not absolve travellers from taking on costs/risks.
 - c) Given increased public scrutiny on pandemic-travel in the public/government sector, researchers should carefully consider the possibility that external funders (including federal funders like SSHRC or CIHR) may chooses (at their discretion) not allow public funds to be used to cover costs of travel in contravention of duly issued advisories (Section 2.6.2), especially those issued by the Government of Canada. If the costs of travel in contravention with Canadian travel advisories are deemed ineligible by external funders, King’s will not be able to cover those expenses and it will be up to researchers to take on those costs themselves.

3. COVID-19 Safety Plan Document

As part of its re-opening plans, the Government of Ontario has asked organizations engaging in in-person activities to create, and constantly review/revise, safety plans. The aim of these plans is to ensure that organizations are carefully considering how activities and workplaces can be set up to minimize the risk of infection with COVID-19.

Accordingly, each research project where there is the potential for people to interact non-virtually should have a *COVID-19 Safety Plan**. Detailed advice on how to prepare a COVID-19 safety plan is available at the Province of Ontario's [Develop your COVID-19 workplace safety plan website](#). Such plans will include (but are not limited to) the following:

- 1) **Training and Resources:** Identify key resources and training that all members of the research team will have to access and/or must complete in order to work on the project. Also identify resources you might be able to send/provide to participants so they can prepare for their involvement in a safe way.
- 2) **Physical Distancing, Physical Barriers, and Personal Protective Equipment (PPE) Measures:** Identify all research-related activities that will require physical distancing, physical barriers, and/or PPE and describe how those requirements will be met.
- 3) **COVID-19 Screening:** Identify how screening will be completed for all research personnel and/or participants who will be interacting non-virtually.
 - Consider using the Provincial Screening tools since the province updates these as needed: <https://covid-19.ontario.ca/screen-covid-19-going-any-public-place>
- 4) **Infection Response and Contact-Tracing:** Outline the steps that will be taken should someone related to the project (researcher, staff, student, or participant) develop symptoms and/or test positive.
 - In particular, the plan should indicate how the research team will assist with contact tracing (i.e., providing contact information and dates/times of possible exposure to public health authorities if asked).
- 5) **Regular Review and Updating:** Outline how the plan will be regularly renewed and updated based on developments in public policy and directives.
 - A regular review of at least every 4 weeks is recommended.
 - A review should automatically be triggered with each major shift in public policy (ex. changes to Ontario's "colours", steps, etc.), regardless of how recently a regular review was conducted.
 - Identify who needs to be informed of any revisions to the plan (ex. Research Ethics Review Committee, Vice-President and Academic Dean, community partners, research team members, participants, etc.)

King's has prepared a *COVID-19 Research Safety Plan* template that you can use that was based on a template prepared by the Province of Ontario.

Guidance on how to complete the template (including a link to the original template provided by the Province) can be accessed at: [Develop your COVID-19 workplace safety plan](#).

If you choose to develop your own plan, please ensure that all aspects outlined in the Province's examples.

*It is **strongly recommended** that the lead researcher and all members of the research team read the **published [COVID-19 Interpretations of The Tri-Council Policy Statement on Ethical Conduct of Research \(TCPS2-2018\)](#) issued by The Panel on Research Ethics (Canada)** prior to preparing the *COVID-19 Safety Plan* – see Appendix A of this Guidelines document.

4. Filing COVID-19 Research Safety Plans

- 1) Anyone leading a research project at King's that has the potential for people interacting non-virtually as part of the planned official research activities are asked to file the following with King's Vice-President and Academic Dean care of King's Research Facilitator at research@kings.uwo.ca :
 - COVID-19 Safety Plan
 - Revisions to their COVID-19 Safety Plan (as needed)
- 2) The Vice-President and Academic Dean may request clarification or modification after reviewing the plan (or a subsequent revision of it).
- 3) A copy of the plan should also be available in all spaces or locations where non-virtual research activities are taking place. The research team should be able to easily produce an up-to-date plan if requested to do so (ex. by an Ontario Ministry of Labour inspector).

5. Implications for Research Ethics

- 1) **It is important to keep in mind that decisions about how to carry out (or substitute) in-person research activities may have an impact on informed consent, participant well-being and vulnerability, confidentiality, and anonymity, etc.**
- 2) **While preparing and/or reviewing safety plan, researchers should always consider whether they may need to submit a revised ethics application, especially if they identify a need to implement changes from the approved study protocol originally approved by the RERC at King's (and/or other relevant institutions).**
- 3) **The following resources may prove helpful in assessing whether or not modifications intended to reduce the risk of COVID-19 infection may also require review by King's RERC.**
 - The Canada Panel on Research Ethics has published the following TCPS-2 interpretations related COVID-19:
 - https://ethics.gc.ca/eng/nr-cp_2020-09-02.html
 - Some helpful guidance on the kinds of changes that may require RERC approval can be found on the following document prepared by Western's RERC (**note: King's faculty must submit to King's RERC**): <https://www.uwo.ca/research/docs/ethics/OHRE%20Memos/Memo-initiating%20or%20restarting%20research%20Jun%2020202020.pdf>

6. Provincial Resources:

[COVID-19 public health measures and advice](#)

[Ontario COVID-19 Response Framework: Keeping Ontario Safe and Open](#)

[Ontario: Screen for COVID-19 before going to any public place](#)

[Ontario: COVID-19 Plans \(Guidelines and Templates\)](#)

7. Accountability

1) King's University College

- 1) King's University College will issue these guidelines.
- 2) King's will continually review and (if necessary) revise this document in consultation with various stakeholders at King's.
- 3) King's will support researchers seeking to understand how to comply with public health orders and regulations related to COVID-19.
- 4) King's will support research teams take all appropriate actions in cases where risk of exposure to COVID-19 has been discovered – this includes helping the research team coordinate with all relevant public health authorities.

2) Leaders of Research Projects (Principal Investigators – PIs):

- 1) As is always the case, leaders of research projects (Principal Investigators) are ultimately accountable for ensuring the health and safety of everyone involved in the research activities they are directing – including all members of the research team, staff, students, and participants.
- 2) PIs are accountable for making sure an up-to-date COVID-19 *Research Safety Plan* is in place for each research project they lead and they are accountable for ensuring that the plan is followed.
- 3) In cases where people involved with the PI's research project may have been exposed to a virus leading to COVID-19, the PI will be expected to:
 - a) Immediately inform the Academic Dean's Office and public health officials in all regions where the research activities took place during the period of possible exposure. King's will assist the PI with contacting relevant health authorities.
 - b) Fully co-operate with all health authorities in all contact-tracing activities while also respecting all confidentiality requirements of the RERC approved study protocol.
 - c) Immediately pause all research activities until the Vice-Principal and Academic Dean (VPAD) – in consultation with public health officials – advise it is safe to resume activities.

8. Appendix A: The Panel on Research Ethics (Canada) -- COVID-19 Interpretations (TCPS2-2018)

All researchers are *strongly encouraged* to read the published COVID-19 interpretations of *The Tri-Council Policy Statement on Ethical Conduct of Research (TCPS2-2018)* issued by The Panel on Research Ethics (Canada).

The questions, considerations, and information presented there will prove extremely helpful in thinking about how to adjust your research practices and to determine whether or not you may need to seek approval of King's Research Ethics Review Committee in order to conduct research ethically during the pandemic.

The full and up-to-date statement can be accessed at the following hyperlink.
https://ethics.gc.ca/eng/nr-cp_2020-09-02.html