



## Research Ethics Policy

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### 1. INTRODUCTION

Carrier Sekani Family Services (CSFS) is committed to providing high-quality services that promote healing and empowerment among community members. We recognize the importance of actively engaging with our community members throughout every stage of our work, including research initiatives. CSFS takes direct responsibility for delivering a range of essential services, including healthcare, social support, legal assistance, and research, designed to meet the diverse needs of the First Nations peoples of the Carrier and Sekani territory.

At CSFS, we believe in the power of partnership and collaboration in research, viewing it as an essential component in our mission to develop and deliver evidence-based professional services. We actively involve community members in the design, implementation, and evaluation of our research projects, ensuring that their perspectives, priorities, and traditional knowledge are central to our work. Additionally, we are dedicated to building the research capacity of community members, providing training and support to empower individuals to actively participate in and lead research activities. Maintaining the highest standards of service delivery is a core value at CSFS, and we understand that this includes a responsibility to conduct research in a manner that is respectful, ethical, and transparent. Our research practices are guided by policies designed to uphold the rights and interests of the communities we serve, and we are committed to ensuring that all research conducted adheres to the protocols established by CSFS Member First Nations.

Furthermore, CSFS recognizes the importance of cultural sensitivity in research, acknowledging and respecting the traditional knowledge and practices of First Nations peoples. We strive to conduct research in a manner that is aligned with cultural values and beliefs, and we are committed to promoting understanding and appreciation for the rich cultural heritage of CSFS member communities. In line with our commitment to ensure data sovereignty and data governance, CSFS upholds the principles of OCAP® (Ownership, Control, Access, and Possession). This framework recognizes the rights of First Nations Peoples to own, protect, and control all research and data collection processes within their communities. It also acknowledges the rights of First Nations to determine who can access the information collected and how it can be used.

This policy framework details the requirements and processes to promote responsible conduct of research for all researchers, including CSFS staff undertaking research activities. It also specifies the responsibilities of researchers in upholding ethical principles and values that are essential in performing all research-related activities. These values include respect, trust, integrity, honesty, compassion, and responsibility. The policy also defines what constitutes a breach of research policy and how to address such breaches.



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### 1.2 SCOPE

This policy describes the requirements and processes related to gaining access to and conducting research with CSFS and/or the Member Nations and communities. Through the provisions in this policy, CSFS seeks to respect and uphold the rights of individual Member First Nations within CSFS society. Following the principles outlined in the Tri-Council Policy Statement on the Ethical Conduct for Research Involving Humans, CSFS asserts its governing authority as mandated by the Chief and Council of the Member First Nations. This authority extends across the domains of health, social, and legal services, prioritizing the collective rights of the Member Nations while also promoting individual well-being.

This policy applies in the following scenarios, as outlined in the Tri-Council Policy Statement:

- a. When research involving health, social, or legal services is conducted within CSFS Geographic Service Area and intends to involve Indigenous participants as an identified group, or when the study population includes a significant number of Indigenous individuals.
- b. When recruitment criteria include CSFS or its Member Nations' identity as a factor for the entire study or for a subgroup in the study.
- c. When the research involves cultural property, Indigenous Knowledge, or input from a CSFS Member First Nation.
- d. When research data analysis involves CSFS identity or membership as a variable.
- e. When the interpretation of research results references Carrier or Sekani peoples, health, history, language, or culture.

### 1.3 OBJECTIVES

The objectives of this policy are to:

- a. Describe the processes for obtaining approval and specify the expectations for research conducted with, on, or for CSFS.
- b. Promote and facilitate research processes that respect and safeguard the well-being of all research participants and their communities.
- c. Establish a set of ethical principles and review procedures that align with the values of CSFS and the Member Nations, reflecting our commitment to integrity and respect.
- d. Ensure that research activities are carried out in a respectful, professional, and consistent manner, by relevant legislation, research guidelines, and the protocols of CSFS and the Member First Nations.
- e. Support the dissemination of research findings and contribute to improvements in policy and practice, thereby enhancing the overall well-being of our communities.



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### 1.4 DEFINITIONS

- a. The Agency: Carrier Sekani Family Services.
- b. Geographic Service Area: The territory that extends from Member First Nations and immediate areas surrounding the Reserves, from Smithers to Prince George.
- c. Member First Nations: The eleven First Nations communities that are members of the Carrier Sekani Family Services, including T'sil Kaz Koh (Burns Lake Band), Cheslatta Carrier Nation, Lake Babine Nation, Nadleh Whut'en, Nee Tahi Buhn, Saik'uz First Nation, Skin Tyee First Nation, Stelat'en First Nation, Takla Nation, Wet'suwet'en First Nation, and Yekooche First Nation.
- d. Participants: Individuals who take part in research, either directly or indirectly through a representative, and who have given informed consent.
- e. Research: The systematic investigation and presentation of information involving Member First Nations and their community members. It involves the collection, documentation, analysis, and interpretation of data, followed by the dissemination of findings using appropriate methodologies. Informal communication between a CSFS employee or service provider and community members aimed at understanding the community is typically not considered research under this policy.
- f. Breach of Policy: Includes but is not limited to the following:
  - i. Fabrication or falsification of data.
  - ii. Plagiarism, theft of ideas, or appropriation of another's work.
  - iii. Failure to adequately recognize the contributions of those involved in the research.
  - iv. Acquisition of cultural items, including intellectual property, without due benefit to those entitled to the items.
  - v. Failure to comply with federal, provincial, university, granting Agency, or CSFS regulations outlining the protection of researchers, human subjects, or the public.
  - vi. Abuse of power in research activities impacting collaborators, participants, or other members of CSFS communities.
  - vii. Failure to reveal any conflict of interest, direct or indirect, in a company that contracts with CSFS to undertake research.
  - viii. Sharing confidential information with third parties without the permission or approval of the rightful owners.



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- g. Conflict of Interest: Any alternative interest of the researcher that may compromise or seem to compromise the researcher's judgment and integrity during the research process.

### **2. ADOPTION AND INCORPORATION OF ETHICAL PRINCIPLES**

All researchers and individuals involved in research activities shall adhere to the ethical principles and guidelines outlined in CSFS's research ethics standards. Researchers are required to follow the Tri-Council Policy Statement on the Ethical Conduct for Research Involving Humans (TCPS), accessible at [www.pre.ethics.gc.ca](http://www.pre.ethics.gc.ca). The TCPS governs all human subject research in Canada and represents the policies of the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada (NSERC), and the Social Sciences and Humanities Research Council of Canada (SSHRC). It underscores the commitment of these agencies to promote ethical research practices involving humans.

Additionally, researchers must adhere to the Principles of OCAP® (Ownership, Control, Access, and Possession), available at <https://fnigc.ca/what-we-do/ocap-and-information-governance/>. The principles of OCAP® provide an ethical framework for the collection and protection of First Nations data, emphasizing data sovereignty and governance to facilitate meaningful and respectful research. By following these principles, researchers ensure that their work respects the rights and interests of First Nations communities and upholds ethical standards in research practice

#### **2a. GUIDING ETHICAL PRINCIPLES**

At CSFS, we recognize the importance of conducting research that is ethical, community-orientated, and culturally sensitive. We recognize the value of Indigenous knowledge and are committed to ensuring that research is defined and controlled at a community level, is original in scope, and relevant to the needs of the community.

The research we conduct is guided by community goals and aspirations, and we ensure care and respect are integral to all research activities. Our guiding ethical principles are based on a holistic balance of our mission, vision, and values while also promoting a culture of reciprocity and shared respect for knowledge. We are committed to building ethical research relationships and fulfilling our responsibilities to the Carrier and Sekani peoples.

#### **2.1 CSFS MISSION, VISION, AND VALUES**

Research initiatives must align with the Mission and Vision statements of CSFS, and uphold the Guiding Ethical Principles and Values of the Carrier and Sekani First Nations. Additionally, the projects should contribute to enhancing the Agency's capacity in research and/or service delivery to the Carrier and Sekani peoples.

##### **2.1.1 OUR MISSION**

*With the guidance of our Elders, we are committed to the well-being and empowerment of Carrier and Sekani Families by asserting authority over health, social, and legal services.*



### **2.1.2 OUR VISION**

*Yinka Dene living to their full potential*

### **2.1.3 OUR VALUES**

*Respect, Trust, Integrity, Honesty, Compassion, Responsibility*

## **2.2 RESPECT FOR PARTICIPANTS**

CSFS is committed to safeguarding the cultural, mental, spiritual, physical, and emotional well-being of research participants throughout the research process. This principle serves as the foundation for all subsequent ethical principles outlined below.

### **2.2.1 RESPECT FOR FREE AND INFORMED CONSENT**

CSFS is committed to upholding the principle of individual consent. This involves engaging in meaningful dialogue with research participants, ensuring a transparent process that respects their rights, duties, and requirements for freely given and informed consent.

- a. Participants are considered to have provided free and informed consent when they have willingly agreed to take part in a study after fully understanding the research goals, as well as all potential risks and benefits associated with their involvement. This includes being informed about how the research findings will be published and how participants will be notified of the results.
- b. Participants must understand that they have the right to withdraw from the research at any time without facing any penalties or losing any promised benefits that were not dependent on completing their participation.
- c. Any incentives offered to participants must adhere to standard remuneration guidelines for research participation. These incentives should not be excessively large to the extent that they compromise the voluntary nature of their participation.
- d. Free and informed consent from the participant or an authorized third party should be documented in writing. However, if community members prefer to give oral consent, every effort will be made to appropriately record this form of consent.

### **2.2.2 RESPECT FOR VULNERABLE PERSONS**

CSFS prioritizes ethical responsibility, especially towards vulnerable individuals or those lacking decision-making capacity. Special measures will be implemented to safeguard their interests and well-being as follows:



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- a. CSFS shall ensure that vulnerable participants understand the information presented to them and fully understand the potential consequences of their decision, before freely giving informed consent.
- b. Individuals who lack decision-making capacity shall only be asked to become research participants when:
  - i. Free and informed consent is sought from an authorized representative(s) (who is not the researcher or a member of the research team); **and**
  - ii. Research participation does not expose the participant to foreseeable risk.
- c. In cases where the individual lacks decision-making capacity but understands the nature and implications of the research, the researcher shall establish the wishes of the individual concerning participation, even if consent has been given by an authorized representative. If the participant, lacking decision-making capacity, indicates a request to stop participating at any stage, their decision must be honoured, and the procedure halted.

### **2.2.3 RESPECT FOR ANONYMITY AND CONFIDENTIALITY**

CSFS shall respect the participant's rights to anonymity and confidentiality. This involves safeguarding personal data and adhering to relevant privacy laws during data collection, dissemination, and use.

- a. Researchers shall follow relevant privacy laws during data collection prescribed in the following:
  - i. The Principles of OCAP®
  - ii. Tri-Agency Framework for Responsible Conduct of Research
  - iii. Tri-Council Policy Statement for Ethical Conduct for Research Involving Humans.
- b. Participants should be assured of anonymity and confidentiality whenever possible. If anonymity and confidentiality cannot be guaranteed, potential participants must be informed of the limitations and potential implications before consenting to participate.

### **2.2.4 RESPECT FOR INTELLECTUAL PROPERTY**

CSFS shall respect and preserve rights to sensitive or personal information to maintain the cultural integrity of information provided. The Agency shall uphold collective rights to information.

CSFS shall honour and protect intellectual property rights, including sensitive or personal information, to safeguard the cultural integrity of the data shared. The Agency shall also uphold collective rights to information, including preserving original traditional Indigenous knowledge, history, language, art, or any data collected during the research process.



### **3. MINIMIZING HARM AND MAXIMIZING BENEFIT**

CSFS shall ensure that anticipated benefits far outweigh potential harms when conducting community-based research. In conducting research, the Researcher will ensure participants are not subjected to unnecessary risks or harm and shall be obligated to assist the participant in reducing or eliminating any adverse effects that may arise.

#### **3.1 REPORTS OF UNANTICIPATED ISSUES**

Researchers are required to report any unanticipated issues or events that may increase the level of risk to participants or have other ethical implications affecting participants' welfare. Researchers must also report unavoidable single incidents, whether minor or serious, with short- or long-term implications. Examples of unanticipated issues include, but are not limited to, adverse reactions to interventions, breaches of confidentiality, and unexpected challenges that compromise the study's integrity or participant safety.

Researchers must promptly report any such issue to the CSFS REB. The Researcher is responsible for preparing a detailed report that describes the event. This report should include the nature of the issue, its impact on participants, and any immediate actions taken to mitigate risks.

The CSFS REB will review the report and may take actions such as conducting an investigation, requesting modifications to the study protocol, or implementing additional participant protections. Researchers may be required to submit regular updates on the status of the issue and its resolution.

Researchers should also communicate with participants regarding any unanticipated issues that significantly affect their welfare, explaining the nature of the issue, potential risks, and steps taken to address it.

### **4. CSFS RESEARCH ETHICS BOARD**

The CSFS Research Ethics Board is responsible for reviewing applications for research that involve CSFS Member Nations. The REB shall ensure that all research studies conducted under the stewardship of CSFS are ethically acceptable and comply with the CSFS Research Ethics Policy, CSFS Responsible Conduct of Research Policy, and the Tri-Council Policy Statements: Ethical Conduct for Research Involving Humans and Responsible Conduct of Research, and adheres to the Principles of OCAP®. This is to protect the individuals involved, the community, Carrier Sekani Family Services, and the Member Nations we serve. The CSFS Research Ethics Board shall comprise the following:

- a. One member with expertise in relevant research disciplines, subject areas, and methodologies
- b. A CSFS Board member with expertise in relevant research disciplines, subject areas, and methodologies



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- c. An appointee from a participating Member Nation knowledgeable in Traditional law and cultural protocols
- d. One member knowledgeable in ethics
- e. One community member not affiliated with CSFS

### **5. RESEARCH AND ETHICS REVIEW**

To ensure there is knowledge about and support for research involving CSFS Member First Nations, all health, social, or legal research undertaken in a CSFS Member First Nation requires review and approval by the CSFS Research Ethics Board regardless of:

- a. Whether or not it is funded
- b. Whether participants are paid or unpaid
- c. Whether or not it is conducted at CSFS offices
- d. Whether it is conducted in person or by other means
- e. Whether the research is a pilot study or fully developed project
- f. Whether or not findings are intended for distribution
- g. Whether or not the participants are family members

#### **5.1 ACTIVITIES EXEMPT FROM REB REVIEW**

The CSFS REB acknowledges that the TCPS2 exempts the following activities from REB review:

- a. Research that relies exclusively on publicly available information when:
  - i. The information is legally accessible to the public and appropriately protected by law; or
  - ii. The information is publicly accessible, and there is no reasonable expectation of privacy.
- b. Research involving the observation of people in public places where:
  - i. The research does not involve an intervention staged by the researcher or direct researcher interaction with individuals or groups;
  - ii. Individuals or groups targeted for observation have no reasonable expectation of privacy; and
  - iii. Dissemination of research results does not allow for the identification of specific individuals.
- c. Research that relies exclusively on secondary use of anonymous information so long as the process of data linkage or dissemination of results does not generate personally identifiable information.





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- d. Research related to quality assurance, quality improvement, and program evaluation that are undertaken exclusively for assessment, management, or enhancement within the scope of the Agency's mandate. These studies are typically integrated into the Agency's routine activities and are generally carried out as part of regular operations. Research conducted by or under the authorization of CSFS, and is aimed at fulfilling external reporting requirements or supporting the management functions of CSFS.
- e. The initial exploratory phase intended to establish research partnerships or inform the design of a research proposal that may involve contact with individuals or communities.

**5.2** If unsure whether a proposed project is subject to ethical review, researchers, including CSFS staff, shall seek guidance from the CSFS REB on whether ethical review is required for specific projects.

### **6. RESEARCH ETHICS APPROVAL**

All research, including secondary data, that involves human participants or identifiable personal or organizational data from CSFS, or any of the Member Nations we serve, must obtain ethical approval from the CSFS REB before research begins. The research cannot proceed without approval from this board. For a proposal to be deemed acceptable, the researcher must demonstrate adherence to the following ethical principles:

- a. The appropriate methods will be used to protect the rights and interests of participants and Member Nations during the research.
- b. The project contains sufficient safeguards to ensure primary ethical principles related to informed consent, anonymity, confidentiality, protection of vulnerable individuals, protection of sensitive or privileged information and minimization of harms are adequately addressed.
- c. All appropriate and applicable safety standards shall be maintained.
- d. The CSFS and the Member First Nation(s) participating in the research have been adequately involved in the research design, and any protocol agreements arranged will be established prior to the commencement of research.
- e. The Research project develops new knowledge and a plan for distributing that knowledge to the community and external stakeholders.

The CSFS Research Ethics Board may approve, reject, propose modification or terminate any proposed or ongoing research conducted by a researcher if the research fails to uphold ethical standards.



## **7. RECONSIDERATION AND APPEAL OF REB DECISIONS**

Researchers are entitled to request a reconsideration of a REB decision, which the CSFS REB is obligated to provide. Requests for reconsideration of CSFS REB Review decisions should be made prior to requests for appeals.

### **7.1 RECONSIDERATION**

The initial phase of reconsideration may involve informal discussions between the researcher and the CSFS REB Chair. If these discussions lead to a resolution, the outcome will be officially recorded and incorporated into the application materials as needed.

Should the informal discussions fail to resolve the issue, the researcher has the option to request a formal reconsideration. This requires the researcher to submit a detailed written request to the CSFS REB Chair, clearly outlining the concerns regarding the initial review. Additionally, the researcher is granted the opportunity to be heard in an CSFS REB meeting to further discuss the identified issues.

In the event of a formal reconsideration request, it is the researcher's responsibility to provide justification for the reconsideration. This includes specifying any supposed violations of the established research ethics review process of any aspects of the CSFS REB's decision that are not in alignment with the TCPS2 guidelines.

### **7.2 APPEAL**

After fully engaging in the reconsideration process, if a researcher remains unsatisfied with the decision of the CSFS REB, they have the right to initiate an appeal. The researcher is required to provide a written rationale detailing the grounds for an appeal.

The appeals process will be overseen by an appeal committee that is external to CSFS. This ensures an objective review of the case. Appeals can be made on the basis of either procedural or substantive grounds. Procedural grounds may include actual or perceived bias related to the research's validity, methodology, theoretical basis, scope, or any undeclared conflicts of interest among the CSFS REB members.

The appeal committee is mandated to function independently from the CSFS REB to guarantee a fair and unbiased hearing for all involved parties. Both the researcher and the Chair of the CSFS REB are entitled to meet with the appeal committee to discuss the appeal. The committee's role includes determining whether a procedural or substantive error has been made in the initial review.

Should the appeal committee find that an error occurred, it will instruct the CSFS REB to re-evaluate the application, considering any procedural modifications suggested by the committee in their decision and accompanying rationale.

The written outcome of the appeal, along with the reasons behind the decision, will be promptly communicated to all parties. The decision of the appeal committee is final and binding, with no option for further appeal.



## **8. BREACH OF POLICY**

Any complaints related to a breach of policy will be directed to the Director of Quality of Innovation for presentation to the Research Ethics Board. Consent forms will ensure that the Director of Quality and Innovation has contact information in case of complaints.

Disciplinary rules and procedures will follow the guidelines outlined in the CSFS Administrative Procedures Manual and CSFS Responsible Conduct of Research Policy and will be forwarded to any other governing body or institution to which the researcher is affiliated.

## **9. CONSULTATION WITH MEMBER FIRST NATIONS**

Collaboration with the communities we serve is an essential component of community-based research completed by the Agency. In keeping with this strategy, the following areas require review prior to conducting research:

- a. Community Relevance
- b. Intellectual Property Protocols
- c. Approach
- d. Innovation

## **10. RIGHTS TO MATERIALS ARISING FROM RESEARCH**

CSFS will be the owner of any research reports created by or on behalf of the Agency and will maintain research materials commissioned by CSFS or created involving significant use of Agency personnel, funds or other resources unless:

- a. A written agreement is developed between CSFS and the principal investigator/author to produce a final report.
- b. The final report is created involving arrangements with third parties, which may include a level of ownership by the sponsor.
- c. A written agreement is developed between CSFS and a Member First Nation to return research materials from community members to their respective Member First Nation.

Written agreements as to the rights of the Agency and investigator(s)/author(s), third parties of Member First Nations may be established before the work begins if there is a question as to whether ownership of the research materials created will belong to the author(s), third parties, Member First Nations or the Agency.



## **11. GUIDELINES FOR AUTHORSHIP**

Authorship shall be reserved for those who have made significant intellectual contributions to the research and manuscript writing, including:

- a. All authors should have made a substantial contribution to the conception, design, analysis and interpretation of data
- b. They should have been involved in writing and revising the manuscript for intellectual content.
- c. They typically have approved the final draft

Those who have made contributions to the work, including data collection or only parts of the above-mentioned criteria, shall be credited in the acknowledgements but not receive authorship. To avoid misunderstandings, authorship should be discussed and agreed upon well before the manuscripts are completed.

The primary author shall be listed as such, typically by being listed first, and all other authors listed in descending order of contribution.

## **12. SECONDARY USE OF DATA**

Secondary use of data refers to the use of materials in research or other reports beyond the research uses consented to by the participant.

If the researcher intends to utilize primary sources of information, such as audio/video recordings or transcripts, and the participant has agreed that the recordings or transcripts will be used solely for the initial research, then permission must be obtained from the participant prior to using the data for any subsequent research.

If a person is no longer able to give consent, consent may be obtained from the executor of their estate or a person deemed to be appropriate under Carrier or Sekani Law.

## **13. RESPONSIBILITIES OF RESEARCHERS**

Researchers are primarily and ultimately responsible for the protection of research participants, and for familiarizing themselves with the principles and application of responsible conduct of research. To fulfill this responsibility, researchers must be competent in their areas of inquiry and must be familiar with the above-mentioned CSFS ethical standards as well as other ethical and legal standards guiding research conduct. For those who hold oversight roles, it is important to provide appropriate supervision and training to create a positive and constructive working environment for research. Program Executive Directors or other bodies overseeing research must ensure that all research personnel are familiar with and comply with CSFS research guidelines.