|  |
| --- |
| **HREC Guidance** |
| **Title:** Participant Reimbursements | **Date:** 25 August 2019 |
| **Purpose:** To describe the guiding principles for reviewing and approving participant reimbursements |

# National Statement Guiding Principles

* **Section 2.2.10:** It is generally appropriate to reimburse the costs to participants of taking part in research, including costs such as travel, accommodation and parking. Sometimes participants may also be paid for time involved. However, payment that is disproportionate to the time involved, or any other inducement that is likely to encourage participants to take risks, is ethically unacceptable.
* **Section 2.2.11:** Decisions about payment or reimbursement in kind, whether to participants or their community, should consider the customs and practices of the community in which the research is conducted.
* **Section 3.1.22** Researchers and reviewers should consider the degree to which any payment in money or incentives of any kind, whether to researchers, participants or others involved in recruitment, could results in pressure on individuals to consent to participate. This is especially important with respect to research that involves more than low risk of harm.

# Decision making process

La Trobe Human Research Ethics Committee and its Low Risk Committees will review requests to provide research participants with forms of reimbursement/incentives on a case by case basis in line with the following principles:

* Target population
* Risks and/or burdens association with the research
* Relationship between inducement and the ‘market’
* Language used in recruitment materials is free from coercion and accurately explains the reimbursement type, process and what happens in the event of withdrawal. Recruitment materials include advertisements, letters of invitation and Participant Information Statement and Consent Form (PICF).
* Usual practice in research and
* Usual practice in the relevant industry sector the participants are to be drawn from.
* Reimbursement/incentive does not pressure individuals to consent to participate (National statement 3.3.18)
* Justification for the approach taken, consideration for potential coercive effect of payment needs to be included in the ethics application.

# Types of reimbursements

Ethics Applications may contain one of more of the following types of reimbursements:

1. **Reimbursements for costs (set or paid upon receiving receipts):** in addition to providing food and beverages, it is standard practice and respectful to participants to reimburse costs such as
	1. Travel
	2. Parking and/or
	3. Accommodation
2. **Reimbursement for time (paid after completion of study tasks, if multiple visits, generally paid after each visit):** In addition to costs above, where participation in research will involve a significant burden of time and/or risk the researchers can reimburse them for that time. The amount they are reimbursed depends on:
	1. The risks of the study procedures to the participation (higher risk projects generally have higher reimbursement)
	2. Time burden
	3. Hourly rate that is reasonable for the target population
3. **Credit points:** Student course credits are acceptable for courses where the Department/School/institute has determined that research experience as a participant is beneficial and to be encouraged. However, alternatives to participation should also be available e.g., education activities or assignments, and this should be acknowledged in the Participant Information Statement and Consent Form (PICF). Credits should be awarded if the student has participated and later decided to withdraw from the study.
4. **Incentives/Inducements/Coercive payments:** Ethically speaking, this is the most problematic form of payment as there is no direct link between the payment and cost to participants. Instead, the purpose is to encourage participation, therefore incentives can easily be coercive if not justified and managed correctly. The following are guiding principles when reviewing incentives:
	1. It is not appropriate to offer incentives in research projects that are high risk (e.g., $10,000 to participate in a new brain scanner using ionising radiation).
	2. It may not be appropriate to offer incentives for the same ethics application where the target population are vulnerable.
	3. For shopping gift cards, consideration must be given to vulnerable participants who may use these cards to buy alcohol etc…In this case an appropriate risk management strategy must be outlined in the ethics application.

**The following are examples of how context changes whether it is an incentive or coercion**:

* 1. **Target population:** A payment of $150 to a homeless youth might be considered coercive, while the same amount offered to a store manager probably is not.
	2. **The risks and/or burdens associated with research:** Where there are very few risks or burdens associated with participation in a research project, the ability of an inducement to be coercive. E.g., offering $150 too homeless youth to take an anonymous questionnaire about their favourite music might be a significant inducement, but the absence of any meaningful risk to the participants means that the inducement cannot be characterised as coercive.
	3. **Relationship between inducement and the ‘market’:** Increasingly market research and other fields utilise inducements to encourage participation. An important consideration in determining whether an inducement should be considered coercive is whether the proposed inducement is comparable to what participants might be offered from other reputable sources e.g., sporting venue might offer the chance to win a ticket to the next game to encourage members of the crowd to complete a survey, so it would be appropriate for researchers in the same context to offer the same kind of inducement.
	4. **Anonymous incentives:** If participants are to remain anonymous the following must apply:
		1. **Physical surveys:** have a separate page (or tear away) for participants to list their name and contact details. This is immediately separated from the survey.
		2. **Online surveys:**  ask for name and contact details ensuring separate database without any relational link between survey and name.
1. **Prize drawers:** If running a lottery or lucky draw the researchers need to ensure that their approach is consistent with the lottery laws. This means an Australian wide prize draw must be compliant with all state and territory laws, and if offered to overseas participants, the prize drawers are to meet the laws of that country. For this reason, researchers are generally discouraged from prize drawers including international participants.When using a prize draw the following must be adhered to:

**Designing Prize Draw**

* 1. The Research project is not an externally funded contracted fee-for-service project (i.e., a third organisation is NOT contracting La Trobe to specifically conduct the Prize draw).
	2. Separate database will be kept for storing participant’s personal information for the purposes of the draw research) and in accordance with the Research Data Management Policy and the [Privacy and Data Protection Act 2014 (Vic)](http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/PubStatbook.nsf/f932b66241ecf1b7ca256e92000e23be/05CC92B3F8CB6A6BCA257D4700209220/%24FILE/14-060aa%20authorised.pdf).
	3. Entry is voluntary and compliant with relevant legislation for all jurisdictions that participants are being recruitment from

**Recruitment Materials**

* 1. The prize draw (including any recruitment materials) is not being conducted to promote trade or business i.e., to promote La Trobe or its core business services
	2. There are no ‘cash prizes’ – prizes must be limited to non-monetary options such as gift/store cards (not redeemable for cash), goods (e.g., tablet)
	3. Electronic value cards that can be used to withdraw money or alcohol or tobacco products in any form or firearms or ammunition or prohibited weapons or cosmetic surgery or other procedures designed to improved personal appears
	4. Any recruitment advertisements are honest and not misleading, and should include details of when the prize will be drawn
	5. Winners are notified within one to two days of the prize being drawn
	6. The **total** prize pool is no more than $1,000 AUD
	7. Drawers must be administered and conducted by someone independent of the participants and ideally also of the research team.
	8. The mechanism of the prize drawer should be explained in the body of the PICF (in the reimbursement section.
	9. A tick box stating the participant consents to the terms and conditions is included **PRIOR** to completing any study tasks.
	10. The details and conditions of the draw process should be included in the PICF, generally as an appendix. Terms and conditions template are attached as Appendix A and should be submitted for legal review prior to ethics approval being obtained.
	11. Consider translations of the participant information sheet, consent forms and the prize draw terms and conditions for participants who are from non-English speaking backgrounds.
	12. If using social media prize draw organisers must read and abide by the Terms of Use of the social media platform used.

**Principal Investigator Responsibilities**

* 1. Ethical approval is obtained
	2. Keep accurate records, including number of participants, winners and amount of prize draw.
	3. Must not use participants’ personal information other than for the purposes of the prize draw.
	4. Prize must be transferred to the winner no more than 28 days after the draw.
	5. Competition organisers must ensure that all competition prizes have been obtained and are available to be distributed before the competition commences to ensure compliance with the Competition and Consumer Act 2010.
1. **Examples of approved payments**
	1. $50 shopping voucher
	2. Chance to win of three $50 gift cards
	3. Chance to win 1 of 10 gift cards values at $100 for survey respondents and a payment of $50 for interview participants
2. **Third party recruitment agencies:** Researcher can choose to access participants via a third party, often a market research company. In the ethics application, the researchers must outline:
	1. Rationale for this approach
	2. Evidence any payments made to participants via the third party are in line with these guidelines
	3. Evidence the third party has clear policies and processes in place to manage the collection and management of participant data in line with relevant privacy laws, and data flow (e.g., how data is sent to researchers for analysis etc…).