

REB Guideline: Secondary Use of Data

Current Status: Approved and Posted

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1. Definition of Secondary Use of Data

- a. The *Tri-Council Policy Statement (TCPS2)* defines secondary use of data as "the use in research of information or human biological materials originally collected for a purpose other than the current research purpose" ([application 2.4](#)).
- b. The Brock REBs have extended this definition to include a third-party's access to research data collected by one researcher or research team for a purpose that was not originally identified in the research protocol or consent processes. Such third parties may include students who desire to use such data for theses or research papers, or colleagues, whether at Brock, another university, or public agency.

2. Secondary Use of Anonymous Data is Exempt from REB Review

- a. [TCPS2 article 2.4](#) specifies that "REB review is not required for research that relies exclusively on secondary use of anonymous information, or anonymous human biological materials, so long as the process of data linkage or recording or dissemination of results does not generate identifiable information."
- b. [TCPS2 chapter 5](#) clarifies that anonymous information "never had identifiers associated with it (e.g., anonymous surveys) and risk of identification of individuals is low or very low." Anonymized, coded, or de-identified information is not anonymous.

3. Secondary Use of Non-Anonymous Data Requires REB Review

- a. Consistent with [TCPS2 article 2.4](#), the Brock REBs require ethics review of all research studies that include the use of secondary data that are not anonymous (i.e., REB review is required if the data were ever associated with identifiers).
- b. Researchers are encouraged to review the *TCPS2* discussion of secondary use of identifiable information ([chapter 5, section D](#)) or of human biological materials ([chapter 12, section C](#)) prior to submitting an application for ethics review of research involving secondary use of data.
- c. *TCPS2* explains situations in which participant consent will or will not be required. When it is impossible or impractical to secure informed consent from all participants, the REBs may be willing to consider instead consultations with representatives from the participant group.
- d. The Brock REBs may require full board review if identifiable data will be published or there is a significant risk of breach of confidentiality. Consent would normally be required in such situations.

4. Data Linkage

Researchers should pay particular attention to the use of databases and be sensitive to the possibility of identifying individuals by linking databases (see [TCPS2 article 5.7](#)). The Brock REBs consider the possibility of identification or re-identification of individuals through the research and the extent of the harm or stigma that could result from identification.

5. Re-Contacting Research Participants

Researchers who wish to contact individuals to whom data refer shall seek the authorization of a Brock REB prior to contact. The researcher must provide compelling reasons why follow-up contact with former study participants is required.

6. Making Data Available to Other Researchers

- a. The primary researcher(s) has exclusive right to use data collected in any study for the period of time that is required to complete the research study, consistent with the purpose approved by the REB.
- b. Thereafter, the researcher is encouraged to make such data available to other scholars, including students or other research colleagues, who may re-analyze the data or replicate the study, subject to clearance from the appropriate REB. Researchers are expected to inform research participants about anticipated future uses of the data.
- c. Normally secondary access to the data will not include access to personal identifiers.