

## Guidance on Reimbursements

### Summary of National Statement Principles

Under the National Statement, the preferred model of consent to participate in a research project is that the consent is voluntary, informed and active.

Offering reimbursements, incentives or the possibility to win a prize as the result of participating in research has the potential to impact on the voluntary nature of consent and to coerce participation. The National Statement does not explicitly address the matter of gifts or prize draws for participants, rather it concerns itself with the concepts of inducement and coercion and respect for participants.

Section 2.2.10 of the National Statement (2007) discusses payments to participants:

“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.”

### Overview

The Western Sydney HREC judges requests to provide research participants with forms of reimbursement / incentive on a case by case basis in the context of the:

- overall project
- usual practice in research and
- usual practice in the particular industry sector the participants are to be drawn from.

In considering such requests, the HREC is guided by the National Statement which says:

“An HREC should be satisfied that:

(a) payment in money or incentives of any kind, whether to researchers or participants, does not result in pressure on individuals to consent to participate (see paragraphs 2.2.10, and 2.2.11)” (NS 3.3.18)

Research projects that intend to seek approval for reimbursements/ incentives need to provide cogent arguments for the approach to be taken, show consideration for the potential coercive effect of the payment, and provide the committee with enough contextual information for it to make a decision.

It should be noted that there are certain groups of participants, and certain risk levels in projects, that make offering payment for participation more problematic.

## Reimbursements

### Reimbursements for costs

Participation in research can sometimes involve participants incurring costs (e.g. travel, accommodation and/or parking costs). It is acceptable that reimbursement for, or a contribution to, those costs be made available to participants.

### Reimbursements for time

Where participation in research will involve a significant burden of time on participants, the researcher(s) might consider reimbursing participants for that time.

The question of whether or not this should be considered an inducement, rather than a reimbursement, rests upon whether or not the researcher can accurately determine the “cost” of the time involved by participants in the research.

Researchers who wish to provide reimbursements for time should outline in the ethics application the justification for this type of reimbursement and how the 'cost' was arrived at.

### **Paying a request for reimbursement**

The researcher will need to determine whether a set reimbursement is to be offered or if the participants will be required to provide proof of having incurred costs. The preferred method at Western Sydney is a set reimbursement as this is considered the least complicated and easiest method to convey to participants. If researchers decide not to follow the set reimbursement approach the reason for the decision should be explained in the ethics application and the process for ensuring participants can reclaim their costs needs to be outlined in the application.

The chosen approach also needs to be clear in the participant information sheet and if participants need to prove a claim amount they need to be told what evidence will be required e.g. parking tickets, and what process will be followed.

Researchers should discuss the requirements and procedures for payments to research participants with their School / Institute manager.

### **Incentives**

The potentially most ethically problematic form of payment to research participants is an incentive to encourage them to participate. Unlike a reimbursement, there is no direct link between the payment and cost to participants. Instead, the purpose of the payment is to encourage participation.

#### **Determining whether an incentive is coercive**

A payment/incentive could be considered coercive if, having considered the risks and burdens associated with a research project, a person decided not to participate, but when they heard about the incentive they concluded they should participate.

In situations where an incentive can be offered, the assessment of whether an incentive is coercive will depend upon the following factors:

1. **The circumstances of the potential participant pool.** For example – a payment of \$75 to a homeless youth might be considered coercive, while the same amount offered to a store manager would probably not.
2. **The risks and / or burdens associated with the research.** Where there are very few risks or burdens associated with participation in a research project, the ability of an inducement to be coercive is less of an ethical concern. E.g. offering a payment of \$75 to a homeless youth to take an anonymous questionnaire about their favourite music might be a very significant inducement, but the absence of any meaningful risk to the participants means that the inducement cannot really be characterised as coercive.
3. **The relationship between the inducement and the 'market'.** Increasingly market research and other fields utilise inducements to encourage participation in their data collection. 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. a 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.

#### **Examples of approved payments made at Western Sydney**

- \$50 shopping vouchers
- Chance to win one of three \$40 gift cards
- Chance to win 1 of 25 gift cards valued at \$100 for survey respondents and a payment of \$50 for interview participants
- \$100 payment for a funded project with international participants, based on the justification that this is standard in the overseas countries and was a funded item in the project budget.

### **Guidelines when offering incentives**

The University's interpretation and implementation of Section 2.2.10 of the National Statement (2007) is:

1. It is not appropriate to offer incentives in research projects that are risk rated as high risk.
2. It may not be appropriate to offer incentives for some projects which are risk rated as Low 2, particularly when the risk rating is based on participant vulnerability.
3. In the case of an incentive in the form of shopping vouchers, the researchers should consider the potential for vulnerable participants to use the voucher in ways that may reinforce that vulnerability and where appropriate outline risk management strategies to avoid that possibility.

### **Incentives and anonymous research**

Ensuring the anonymity of individual recipients may provide an important protection against significant risk and / or may be likely to increase the participation rates if individuals know that the researcher(s) cannot identify them.

At the same time the researcher(s) may have decided to offer some form of incentive, whether a direct incentive or a 'prize draw'.

How then to maintain the anonymity of responses, whilst at the same time having a mechanism to send the individual the incentive / enter them into the draw?

The most typical response to this situation is to separate the data collection and the incentive mechanism.

For example:

1. with hard copy surveys:
  - a tear away page for the incentive mechanism (where the participant lists their name and contact details) and this being immediately separated from the survey once it is received.
  - a separate envelope in the return where the participant separates their completed survey from their incentive entry.
  - a completely separate return mechanism for the survey and incentive entry.
2. with online data collection:
  - by recording the data from the completed instrument and the incentive entry in completely separate tables without any relational link between the two tables.

It is important that the informed consent materials explain the approach to these matters so potential participants understand the degree to which the incentive entry mechanism compromises or has no effect on the anonymity of their response. If left unexplained some individuals may elect not to participate or may even complain about the project.

### **Prize draws**

If running a lottery or lucky draw the researchers need to ensure that their approach is consistent with the lottery laws. If a raffle is held in Sydney, then the participant is meeting NSW laws, if a raffle is organised overseas then the researcher is required to meet the laws of that country.

The details and conditions of the draw process should be included in the consent process, generally as an attachment to the informed consent package. Sometimes the mechanism for entry to the prize draw will need to be explained (e.g. if the data collection is otherwise anonymous).

Prize draws must be administered and conducted by someone independent of the participant pool and ideally also the research team.

### **SONA credit points**

Student course credits are acceptable for courses where the 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. educational activities or assignments, and this should be acknowledged in the Participant Information Statement (PIS). At Western Sydney course credits are awarded even if the participant withdraws from the research.

### **Recruitment material and reimbursements or incentives**

The language used to describe the payment can impact on the ethical implications of the payment e.g. gesture / token; compensation / reimbursement.

When a reimbursement or incentive is being offered, recruitment material should not have the potential to coerce an individual to participate. Therefore, researchers need to reflect on how the payment will be described in recruitment material so that it cannot be seen as an inducement to participate.

The design of the recruitment material should not focus on the payment for participation.

### **Participants withdrawing from the research**

Researchers should outline the approach to payment in the case of participant withdrawal in both the application form and the participant information sheet.

The ethics principle is that, for those participants who have consented to be included, withdrawal of consent for both their actual participation and the use of data they provide can be communicated to the researcher and their wishes will be adhered to. A request for withdrawal of participation and/or data from that participation may happen at the collection stage and/or later at the analysis or storage stages.

Researchers need to consider how a withdrawal of consent may impact on the study and whether this will impact on the reimbursement or payment that was outlined in the information sheet.

For the most part, it is expected that participants will receive the stated reimbursement or incentive, or at least part of it.

### **Using third party recruitment agencies**

Researchers sometimes buy access to participants and/or data from 3rd party market research companies. In the ethics application the researcher needs to provide:

- a rationale for this approach to sourcing participants
- evidence that any payments made to participants via this 3rd party are in line with Western Sydney HREC reimbursement guidelines
- evidence that the 3rd party has clear ethical policies and processes in place in relation to the collection and management of participants' data.

### **Further Information**

[http://www.olgr.nsw.gov.au/pdfs/gofc\\_fs\\_gratuitous\\_lotteries.pdf](http://www.olgr.nsw.gov.au/pdfs/gofc_fs_gratuitous_lotteries.pdf)

[http://www.olgr.nsw.gov.au/promos\\_lotteries\\_factsheets.asp](http://www.olgr.nsw.gov.au/promos_lotteries_factsheets.asp)

<https://www.nhmrc.gov.au/about-us/publications/payment-participants-research-information-researchers-hreca-and-other-ethics-review-bodies>

### **Human Research Ethics Guidance Documents available from Research Services**

- Guidance for Researchers New to Human Ethics Review
- Guidance Human Research Ethics Protocols for Coursework Masters
- Guidance on Choosing the most appropriate PIS and Consent
- Guidance on Completing the Project Description
- Guidance on Creating Research Project Flyers
- Guidance on Data Storage and Retention Questions
- Guidance on Ethics Review Exemption
- Guidance on Issues with Informed Consent in Research
- Guidance on Levels of Risk and the Ethical Review Process
- Guidance on Making an Amendment to an Approved Project

- Guidance on Organisations in Research
- Guidance on Questions Related to Cultural Sensitivities
- Guidance on Questions Related to Restrictions on Publication of Results
- Guidance on Receiving and Responding to Ethics Committee Assessor Comments
- Guidance on Research Projects Seeking to use Western Sydney Staff as Participants
- Guidance on Reimbursements
- Guidance on The use of 'Opt Out' or Passive Consent in Human Research
- Guidance on Writing Participant Information Sheets and Consent Forms
- Guidance on Research Involving Young People
- Guidance on Research Projects and DFAT Advice
- Guidance on Using Focus Groups in Research

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