COVID 19: Procedure for notification to ethical committees of changes to data collection and storage methods

During this time of change, it has been necessary for some researchers to change how they collect their data. For example, projects that were planned with face to face interaction in mind, now are carried out online, requiring remote data collection. If this is true for your study, then any change in how you collect (and potentially, store) data must be documented with your Research Ethics Committee (REC) and other relevant agencies (see next steps at end of document). If you are a student, discuss any changes in data collection and/or storage with your supervisor in the first instance.

Please note that informed consent is required for any research activity involving the recording of a person’s image, audio or voice. This can only be provided if the participant is fully informed about how their data will be collected and stored. This detail needs to be provided in the Participant Information Leaflet and Consent Forms which you submit with your ethics application. You may have already provided this information in your original ethics application and associated Participant Information Leaflet and Consent Forms.

However, if you have revised your data collection and/or storage processes these documents now need to be altered to reflect this.

Below are examples of the detail that you may need to provide to your Research Ethics Committee.

1. Data collection
   a. Data collection method changed examples
      i. Face to face data collection (single or group) changed to data collection via telephone, online or in questionnaire format or different method of data collection proposed.
      ii. Questionnaires completed face to face now being conducted over the telephone or online or data acquired by other means.
      iii. Others

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<th>Original approved Data Collection Method approved</th>
<th>Proposed change in Data Collection Method</th>
<th>Supported by IT Service</th>
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<td>Please state Yes or No</td>
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Please note that Teams video conferencing is currently only available to staff. However, supervisors can set up a team for students to use.

Where the data collection is not supported by IT Services, please provide rationale for its use and indicate how it meets GDPR requirements. Please see guidance available on GDPR, Research Data Collection and
Storage when Working Remotely, and the Data Protection Commission Guidance on video conferencing:

2. Data storage

Ideally, storage methods supported by IT services should be used. A full list of these storage methods can be found here. If other methods are to be used, please provide justification for same (see below).

When advising the REC about your data storage and data management, please provide the following detail:

a. Outline which storage systems you now intend to use i.e. Dictaphone, cloud storage solution and name the provider
b. Give details on when the file will be deleted.

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<tr>
<th>Original approved Data Storage Method</th>
<th>Proposed Data Storage Method: Specify name of Storage</th>
<th>Is the proposed storage system supported by IT Services? Please state Yes or No</th>
<th>Deletion Date:</th>
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Where the system is not supported by IT Services, please provide the rationale for its use and how it meets GDPR compliance: Please see guidance available on: GDPR, and Research Data Collection and Storage when Working Remotely.

Next steps:

This document provides details of the information that you need to collate if you need to change your data collection and/or storage methods. Once you have the details collated the following are the next steps depending on the details of the research project:
• Return to the college REC that granted you your original ethics approval. Please contact the relevant REC to check the exact procedures they wish you to follow.
• If a change notified to a REC includes any change in personal data collection or storage, you will also have to amend any associated DPIA which had been submitted to the DPO’s office. Please contact the DPO for research at: researchdpo@tcd.ie
• If the project uses a service provider (cloud storage etc.) which is not on the approved list of providers available here this will also need to be communicated to the DPO’s office (dataprotection@tcd.ie).
• If you have ethics permission from another ethics committee, please also inform that ethics committee of the changes made.