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**“Seeking approval from universities to research the views of their staff. Do gatekeepers provide a barrier to ethical research?”**

Katherine Christian, Carolyn Johnstone, Jo-ann Larkins, Wendy Wright  
Federation University, Australia  
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**Abstract**

A “gatekeeper” is someone who controls access to an organisation; “gatekeeper approval” is often needed before external research can take place within an organisation. We explore the need for gatekeeper approval for researching views of university staff employing, as a case study, a project which collected data in Australian universities. This case study addresses known issues, seemingly rarely addressed in the literature.

The requirement of the Human Research Ethics Committee (HREC), possibly overstepping its responsibilities, for approval from individual universities to approach their approach staff brought significant consequences. Simultaneously, since invitations could legitimately be distributed via other avenues, such approval was superfluous. We recommend the HREC’s blanket requirement for institutional approval be waived where participants themselves are able to provide informed consent.

## **Introduction**

Research projects involving human subjects in Australia are governed in accordance with the Australian Code for Responsible Conduct of Research (2018) (The Code) and The National Statement on Ethical Conduct in Human Research (2007) - Updated (2018) (the National Statement). The process of requesting ethical approval for research is similar to those practised in many other countries, for example the United Kingdom (as explained by Smajdor, Sydes, Gelling, & Wilkinson, (2009) or in South Africa (Singh & Wassenaar, 2016). Prior to embarking on data collection for any project involving people, university researchers must submit a research proposal to an institutional Human Research Ethics Committee (HREC). The HREC is responsible for considering the ethical implications of proposed research projects undertaken by university staff and students that involve or impact on humans, and for ensuring that the ethical standards of such research are maintained. The Committee's primary role is to protect the welfare and rights of participants in research. The HREC must be satisfied that the research protocol gives adequate consideration to participants' welfare, rights, beliefs, perceptions, customs and cultural heritage, both individual and collective (National Health and Medical Research Council, 2018b) and its responsibility extends to matters including validity of the research, provision of participant information and informed consent.

With respect to research, a “gatekeeper” is variously described as the adult who controls or limits researcher's access to participants; the person within a group or community who makes the final decision as to whether to allow a researcher access to undertake research or the individual who has the power to grant or refuse access to the research setting (McFadyen & Rankin, 2016).

Often “gatekeeper approval” is needed before research within an institution can take place (Emmerich, 2016; Horan & Israel, 2016; Singh & Wassenaar, 2016). The role of the gatekeeper can be important, particularly in the context of research projects involving vulnerable participants such as children, or people at some particular risk, (a matter addressed in the National Statement) where it is essential. Additionally, the gatekeeper may be of value to assess whether the proposed research is not burdening an already over-researched community (Koen et al., 2017) or to ensure that there is no duplication of research already underway (National Academies of Sciences, 1991). Whatever the nature of the research, the gatekeeper certainly has responsibilities to ensure that people within their institution or organisation remain protected and free from coercion at all times (McFadyen & Rankin, 2016).

While considerations of over-research are valid in some circumstances, for example in research in Indigenous populations, and unintentional duplication of research should be avoided, we believe these concerns are not of relevance in the situations under discussion. While we endorse the necessity, and indeed the merits of ethical review, (Walker & Read, 2011), and the value of the gatekeeper role in many situations, we question the requirement for “gatekeeper approval” for projects involving adults able to grant individual consent. We have particular concerns where the gatekeeper for an institution with a non-vulnerable target population has little to gain by permitting research which might undermine the reputation or competitiveness of the organisation, yet the target population could benefit. Relevant to this case study, the gatekeeper may be more concerned with matters including the public image of the organisation and/or matters relating to operational and management problems in the administration (Broadhead & Rist, 1976) rather than any potential benefit to the participants. We posit that gatekeeper approval is not always relevant, especially when

the community is not vulnerable or clearly defined as being under the gatekeeper's authority. Further, where commencement of research is reliant on gatekeeper approval, if the gatekeeper fails to respond to a request for approval (as opposed to denying approval), the research can be held up or prevented without a valid purpose. Those in the position of gatekeeper should be aware the process needs to be considered from the perspectives of both the researchers and the gatekeepers (McFadyen & Rankin, 2016).

Part of the purpose of ethical review is to approve research proposals and thus to provide, independent of the researcher, assurance to both gatekeepers and participants that the research meets established standards; there is no need for gatekeepers to require duplication of approval (Emmerich, 2016). It is assumed by researchers that studies are able to commence once ethical approval has been granted and agreed access to the research environment and participants has been confirmed. At times, though, the gatekeeping process which permits that access to the research environment can present the researcher with new challenges (McFadyen & Rankin, 2016)

Although this paper discusses social science research, the ethical principles of the international ethical guidelines for health-related research involving humans (CIOMS Guidelines) (World Health Organization & Council for International Organizations of Medical Sciences, 2017) broadly apply, as they focus primarily on rules and principles to protect humans in research. Guideline 4 ensures it is the responsibility of HRECs to ensure that risks to participants are minimised; only Guideline 21, for cluster randomised trials in which participants could certainly be placed at risk, recommends the involvement of institutional gatekeepers.

In order to protect the rights of vulnerable communities, Section 2.2.13 of the National Statement specifies "Within some communities, decisions about participation in research may involve not only individuals but also properly interested parties such as

formally constituted bodies, institutions, families or community elders. Researchers need to engage with all properly interested parties in planning the research.” In keeping with this clause, but perhaps acting outside its intent (Christian et al., 2019), some HRECs in Australia routinely request sighting of written permission from each institution if research is to be conducted in externally, prior to commencement of the research, as a blanket requirement. This requirement is applied regardless of the characteristics of the potential participants or the nature of the research. At the same time, the nature of the gatekeeper required to give permission is not specified.

We illustrate the issues we have identified arising from the need for gatekeeper approval from universities in otherwise low-risk research via a case study which will be described below. Supporting the views of others (Broadhead & Rist, 1976; Guillemin et al., 2012), we show the requirement for gatekeeper approvals prior to surveying university staff added little or no ethical benefit to the participants and brought significant consequences which were detrimental to recruitment. Unlike cases reported in the literature (such as in McFadyen & Rankin, 2016) where the gatekeepers either gave or denied permission, this case study includes discussion of the situation where failure to respond at all had important consequences. Overall, the experiences of this case study lead us to question the need and value of such a blanket requirement for research with adults able to provide consent.

## **Method**

### ***Case study context: seeking ethical approval for a national survey***

In the case of the project described below, we followed the standard ethics process and the HREC approved our proposed research (Federation University Australia Approval 18-139) on the first application with the condition that we must first “submit

the external organisation's approval/permission letters" to the HREC for each organisation for which there would be a direct approach to staff. The requirement of the HREC for gatekeeper approval for this project, and whether that requirement was a misinterpretation of the National Statement, is examined in detail elsewhere (Christian et al., 2019). There has been relatively little attention given to gatekeepers in social research literature (Crowhurst & Kennedy-Macfoy, 2013); this manuscript explores a subject rarely discussed: the difficulties associated with a requirement for gatekeeper approvals for research involving individuals employed within universities. We also explore the administrative burden brought to such projects by this requirement.

Following the approach of others (McFadyen & Rankin, 2016; Monaghan et al., 2013; Paull, 2010)), we seek to add to literature that critiques particular aspects of research ethics governance (Emmerich, 2016; Hedgecoe, 2016), particularly with respect to social science research (Dingwall, 2008; Schrag, 2011) and that which examines situations in which human research ethics committees might be regarded as having overstepped their responsibilities (Guillemin et al., 2012). We wish to add a particular example of administrative burden imposed by an ethics requirement in order to alert other researchers to be aware of the time and possible cost which they might need to invest should they receive a similar request. In conjunction, we support requests to ethics committees to fully consider the implications of the requirements set out in their processes (Guillemin et al., 2012; Scott et al., 2020).

In this case study, while the "permissions" requested were collected and forwarded to the HREC as they were received, there was no indication that these permissions were to be further considered by the HREC as evidence that the universities were happy to allow this research to happen, or that the research was not already happening. There was thus no additional linking point provided between the ethical

needs of the potential participants in the universities, the researchers and the HREC, and no ethical gain.

We did not seek exemption for this requirement from the HREC as it was a clear condition of the ethics approval. Upon reflection, such a discussion may have been worthwhile, however we are unaware of any instances where such gatekeeper approval has been waived.

*Case study context: seeking approval for data collection*

We conducted research exploring factors contributing to the job satisfaction and intention to leave of early-career researchers (ECRs) working in the sciences in Australian universities or independent research institutes (Christian et al., 2021). Data collection for the research included a national survey of ECRs.

For the purpose of this manuscript, we focus on recruitment for the national survey for which we aimed to recruit as many respondents as possible across Australia within a timeframe of approximately three months. Invitations to take part in the survey were distributed via email, using approved text, or via a social media platform, which contained a link to the first page of the survey, held on the university's LimeSurvey platform.

We note that as this project concerned job satisfaction – or dissatisfaction – of the participants, the universities may well have had concerns about reputational risk which could influence the decisions of a gatekeeper (McFadyen & Rankin, 2016). We argue that although the institution could, or perhaps should, have been made aware of the research, the potential conflict of interest for the gatekeeper provides an additional reason why gatekeeper consent should have been waived for this research.



Figure 1 illustrates the three avenues leading to recruitment: direct approach to universities and research institutes, to organisations representing the target participants and via social media.

### ***The process of gaining approvals***

In order to obtain as broad a sample of survey respondents as possible, we directly approached the 37 Australian universities known or expected to conduct scientific research, as well as eight of a possible 42 independent research institutes, for approval to extend an invitation to their staff to participate in our project.

In aiming to follow the required approval process we identified three major barriers to recruitment associated with the need to seek approval, and three facilitators, which will each be discussed below. These are deliberately described in some detail, in order to prepare future researchers for potential obstacles ahead.

#### *Barrier 1 – how to ask institutions?*

The first matter that arose was *how* we should reach out to these organisations in order to seek gatekeeper approval. The decision taken was to send individually addressed letters, on our University's letterhead, to each university, referring to the nature of the project, the population to be canvassed and the conditional approval from our HREC; these letters were attached to an email with a covering note. The eight independent medical research institutes where the senior staff were known to KC, were also approached in this manner.

#### *Barrier 2 – who to ask at universities?*

A second question was who to ask; we needed to identify the “gatekeeper”, the appropriate person at the universities from whom we should seek permission.

Researchers must learn the social structure of the research site to successfully negotiate access (Wanat, 2008). Universities are generally large and complex organisations and no advice was provided by our institution's HREC about who, at the target organisations, should provide the required approval. The complex structure of the universities themselves was a barrier; universities do not have a defined "point of access" through which a researcher can gain approval to conduct their proposed research (Emmerich, 2016). It was not possible to identify an appropriate procedure for seeking permission to contact or survey staff members on any of the university websites.

The two approaches followed were:

- Obtain a single approval for each university, either from the Deputy Vice-Chancellor (Research) or the Deputy Vice-Chancellor (Academic) or from the Dean of Graduate Studies where this (or a similar) position existed, or
- Secure several approvals from lower levels within each organisation, for example from Deans of relevant schools or faculties.

There were risks with each of these approaches. Deputy Vice Chancellors may have weightier priorities than granting permission for conduct of a PhD project, and might overlook, or never actually receive (due to their own gatekeeper), the request. While it seemed likely that approaching the Deans of faculties and schools might secure the required permission, we recognised that this approach would require multiple approvals from each organisation and involved a risk that we would overlook some STEM disciplines in individual universities through incomplete understanding of the structure of each individual university.

### *Barrier 3 – what to do when there is no response?*

A third barrier was that of receiving no response, and lack of clarity as to the reason why. Fortunately, in an experience similar to those described elsewhere (Paull, 2010) we found the research team's knowledge of general university structure and email formats typically used in universities allowed us to target appropriate people, and such people were sent a request. Some responded; if there was no response a second request was sent to the same person. If the second response was unsuccessful, we identified an alternative recipient and tried again, sometimes needing to try a number of avenues before we received a response. As the time passed it became clear that it was unlikely that responses would be successfully elicited from some universities and there was little purpose in pursuing these approvals. It was not possible to fully explore the reasons behind the lack of response without risk of being seen to be troublesome or coercive. When responses were not forthcoming, we increased our efforts with umbrella groups and social media in order to reach as broad a range of survey respondents as possible. The impact of no response at all appears not to have been little discussed in the literature.

## **Results**

### *Successful steps for distribution of the invitation*

There were three facilitators to recruitment: one, finding a person willing to give approval, and two others which each *avoided gatekeeper approval, but which were still compliant with the HREC requirements.*

#### *Facilitator 1 - finding the right person*

Finding *the right person* to give approval within the university was the key, though difficult, step. Where approval was obtained, distribution of the survey

invitation within each organisation was relatively simple, although this followed numerous different processes. In most cases the approver either delegated the task directly to a staff member or gave an instruction about who in their organisation could help to distribute the invitation. In some cases, permission was given, but without any further direction. The best next step was typically to approach the Grants or Research Office for assistance. Had gatekeeper approval not been required, the Grants or Research Office would have been the planned starting point at each institution. The most efficient way to distribute the invitation (post approval) was via the research offices. Key people in these offices could readily identify and contact the target audience with minimal effort and no coercion, and their efforts achieved excellent reach. Sometimes the “magic door” just opened, probably when the institution was interested in the outcome (Paull, 2010).

#### *Facilitator 2 – umbrella bodies*

In order to extend the reach of the study, and to aid inclusion of people working in one of the many independent research institutes, we also approached nine professional organisations which are “umbrella bodies” representing scientists from institutions across Australia and asked them to assist with distribution of invitations. These bodies all gave prompt approval and agreed to broadcast an invitation for their members to participate in the survey through newsletters, websites and/or social media. As described elsewhere (Christian et al., 2019) we did not interpret the requirement to obtain formal approval from gatekeepers as applicable for these “umbrella” organisations as they do not have the same level of responsibility for, or duty of care to, the ECRs. Instead, we simply asked for assistance and received it. This experience suggests umbrella organisations, which act as their own gatekeepers, may provide a more productive avenue for survey recruitment than universities.

### *Facilitator 3 – promotion via social media*

The HREC had approved recruitment via social media, so invitations to participate in the survey were distributed widely via Twitter and LinkedIn. Initial postings were shared widely across these media by individuals and on behalf of organisations. Later, social media was a useful avenue employed to correct imbalances in the participant cohort. The reach of social media as employed in this project was very powerful and very effective. We received significant support from connections on social media and recommend that other researchers consider extension of their recruitment reach by following this approach wherever appropriate as social media, in particular Twitter and LinkedIn, are increasingly being used as a communication tool by STEMM researchers. We did not knowingly recruit through any closed social media channels so there were no privacy considerations. We expect that much of the assistance provided was because we are well-known within the community (Christian, 2021; Paull, 2010).

### ***Outcome***

The data collection process from commencement of seeking institutional approval from the gatekeepers to closure of the survey took seven months. The project received ethics approval on December 8, 2018 and initial request letters to the institutions were distributed during December. Follow up request letters were sent during January and February; it is acknowledged that the approval process was slowed by its commencement in the Australian university shutdown period. The survey received final approval on March 1 and invitation emails and social media messaging were distributed from March 3 until May. The process of seeking approval from non-responding universities, a cause of delay to data collection throughout the project, continued until mid-May, and the survey closed on June 12.

The process taken to achieve permission to survey employees resulted in approvals from 23 of a potential 37 universities (62%) and 8 of a possible 42 medical research institutes (19%, although 100% of those approached directly for approvals), and most of these gave active assistance. Ten universities did not respond at all; four others, following some form of interaction, failed to give approval (as opposed to denying approval). There were *no refusals*.

Table 1, included to provide understanding of the extent of the administrative work this approval process generated for both the researchers and the institutions, details the responses to requests for approval from people in specific positions at universities and independent research institutes.

Table 2, also included to facilitate understanding, shows some approvals came promptly, often with an instruction to a staff member to facilitate the request or a helpful direction about who to contact. Others did not reply. Sixteen institutions approved after only one request; at the other extreme, approval at one university was not received until there had been contact with 10 people over a period of 145 days.

Ultimately responses were received from 658 eligible participants from at least 31 universities and 17 research institutes (the question identifying the name of the institution was optional, so it is not possible to be exact). Of the 381 respondents who identified their institution (58% of the total participants), 286 (78%) were from 29 institutions from which approval was obtained and 84 (22%) from 29 institutions from which no approval was given; there were no identifiable responses from two of the institutions which had provided approval.

Like Paull (2010), we found no one method of approach seemed to have “the key for the gate”. Achieving approval for the case study project required different processes for almost every university, varying from streamlined to highly convoluted,

and were sometimes different even from one faculty to another. This sometimes led to a substantial waste of time for university staff; two such examples are provided below.

At one university one faculty gave approval and willingly distributed the email after a personal contact helped the applicant find the right person to ask. By contrast, an Associate Dean in a second faculty gave approval in principle but asked that the request be referred to that university's ethics office for checking. Having gained this approval, the request was directed to Information Technology. After this, the request went on to Human Resources, and simultaneously the research manager for the Faculty but there was no further progress. Total emails outgoing to this university: 15 with no approval ultimately received, apparently because there was no understanding of the internal process to be followed.

One Dean of Science in a university gave approval after multiple approaches, but simultaneously denied access to faculty research office or human resources staff members who might have offered assistance with distribution. The Dean insisted that staff appropriate for the survey should be identified by the applicant and approached individually. The person in the executive position for health sciences in the same university granted immediate approval without any such barriers.

It is clear that the approval requirement, which may have been indicative of the HREC overstepping its responsibilities, (Christian et al., 2019; Guillemin et al., 2012) proved a substantial barrier to recruitment and brought significant administrative consequences for both the researchers and staff in the universities.

## ***Discussion***

### *Influence of Gatekeepers*

There are multiple areas of influence available to a gatekeeper (Broadhead & Rist, 1976; McFadyen & Rankin, 2016). Exploration of the approvals process within this case study identified (at least) five different “types” of gatekeeper within the university setting:

- The person who provided immediate approval and facilitated the process
- The person who provided immediate approval and made suggestions for next steps to be carried out by others
- The person who re-directed the request to a higher or different authority
- The person who did not know if they had authority to approve
- The non-respondent

Some of these gatekeeper types influenced recruitment success; others, particularly those who failed to respond, were barriers to successful recruitment. While we cannot know how successful recruitment would be at any university or research institute simply because approval was granted, the recruitment results clearly indicate the positive effect of receiving approval and being able to ensure the invitation was circulated within the institution. They also show the negative effect on recruitment imposed by the *need for* gatekeeper approval (as opposed to the consequences of *receiving* approval). If approval was not granted, and thus the invitation not distributed via the institution, participation of ECRs from that institution was proportionally much lower.



The difficulties in the case study did not appear to be a consequence of the gatekeepers' disapproval for this research; approval was not denied by any institution. Instead, much of the impact was from gatekeepers who simply did not respond or did not respond in a timely manner. Given that once permission was granted, there was to be no further interaction between the researchers and the gatekeepers, perhaps the gatekeepers did not feel the request was particularly relevant to them.

The case study results demonstrate the requirement for gatekeeper approval within universities resulted in impact to the sample by both reducing the potential sample size (as a result of preventing direct access) and increasing the proportion of participants from "approving universities" in a manner not dissimilar to that demonstrated by Kearney et al., (1983). They showed the need for written parental consent for research on a student population was estimated to have reduced the sample size by half and, at the same time, introduced sample bias. While Singh & Wassenaar (2016) illustrate that in many cases gatekeepers play an essential and undervalued role in the generation of good research data, we support the view of other social scientists that the gatekeeper approval process can be "tedious, time-consuming and obstructionist" (Singh & Wassenaar, 2016, p.42), as it was in this case, and are not always needed. We saw that university gatekeepers can both facilitate access to participants and bar the way and that negotiation by the researchers became a critical skill within this process, as recorded by Walker & Read (2011).

Although in the case of universities the considerations involved are different from those involving parental consent, we endorse the view of Kearney et al. (1983) that there is a need to further investigate the consequences of explicit consent procedures.

We suggest gatekeeper approvals should not be routinely required for every ethics application; the requirement should be either applied where relevant, or else open to waiver at the discretion of the HREC. Through this research we have demonstrated that requests for approval which are denied, withheld or simply ignored have the potential to obstruct valid research.

*What potential benefit can gatekeeper approval bring to the participants?*

Given the nature of the target population in research projects involving adults working in universities, adults of sound mind able to make responsible, independent decisions about whether to participate in this research, we question whether the receipt of institutional approval mitigates any perceived risk to the participants from the conduct of such a project. This case study's ethics approval enabled a number of methods of extending the invitation to survey participants. There was no obvious risk to participants other than potential irritation from receiving a survey. While over-surveying could be a matter of ethical concern (Koen et al., 2017; Rogelberg & Stanton, 2007), we have not found evidence in the Australian literature that surveying of ECRs for research purposes is commonplace; indeed, it appears to be quite unusual.

We believe that individuals within such populations should be permitted to make up their own minds as to whether they might participate or not, as they do not fall into the type of special category suggested in the National Statement. Instead, researchers, like others (Miller & Boulton, 2007) have to rely on either the co-operation of 'gatekeepers' in contacting potential participants on their behalf and/or on advertising their research and waiting for individuals to come forward and volunteer to take part.

Durham University provides advice on "Research involving a Gatekeeper" on its website (<https://www.dur.ac.uk>) pointing out that requesting gatekeeper approval from

an employer may be required, *but there are times when this is neither possible nor desirable*. They warn that researchers should be wary of requests from an employer to see or filter the responses or to receive enhanced access to underlying data. We support this view, although in our case study only one gatekeeper requested access to his institution's data. This request was denied as sharing this data would have been in conflict with our ethical undertakings.

*What potential ethical benefit can gatekeeper approval bring to the institutions?*

We note that in the case study the survey was about the participants' work, but was unlikely to influence their work, other than to possibly take some work time. This was the only obvious risk for the institution. There was no reputational risk to individual universities from adverse findings as the survey was anonymous, the question identifying the institution was voluntary and there were undertakings within the ethics approval that we would report only group, not individual, data. While gatekeeper approval is legitimate in circumstances such as if the research is to be physically conducted within the grounds of the institution, or only during working hours; those situations did not apply in this case.

While the need to seek permission for conducting this research certainly brought the project to the attention of senior staff at the institutions, which was arguably useful, we are unable to see any additional benefit of the requirement to seek permission before inviting staff to participate, either to the institution or to its staff. Instead, this research, potentially important to the future wellbeing of the potential participants, was hindered by gatekeeper permission, where it may not be necessary for ethical integrity. The research in the case study revealed many in the target community were experiencing serious issues within their workplaces and had much to say about them (Christian et al., 2021); the research community (as opposed to the institutional community) has

subsequently demonstrated an active interest in the outcomes.<sup>1</sup> This research provides an example of a situation where some university gatekeepers may not have supported what their communities wanted.

#### *Conflicting responses from within individual institutions*

Gatekeeper approval processes tend to be very variable across institutions, and even within institutions (Franklin et al., 2012; Wanat, 2008). We have shown that gaining approval for the case study project required different processes not only for almost every university, but also within universities.

#### *Approval was redundant as participants could legitimately be invited – and accept - without gatekeeper approval*

The concurrent, legitimate recruitment to the study by other means, such as social media, permitted participants employed by the non-approving universities to self-select. Due to this legitimate promotion of the survey via social media and the snowball effect (Atkinson & Flint, 2001), responses were received from at least 29 institutions which had not given approval. Social media is an effective recruitment tool (Arigo et al., 2018; Bethel et al., 2021); in the case of this study, the variety of initiatives taken by umbrella bodies to reach their dispersed members and the very nature of social media and its encouragement of sharing resulted in a very broad reach. This leads us to question whether the gatekeeper approval process for recruitment at universities was actually redundant when social media, which operates outside institutional boundaries, was permitted.

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<sup>1</sup> At the time of submission, the manuscript Christian et al.(2021) and its pre-print have each been accessed almost 5,000 times and the research has attracted interest of both media and umbrella organisations

### *Approval made access difficult and provided its own barrier*

At the same time, the gatekeeper approval process, even when successful, can provide a barrier to dispersal of invitations to participate in research. Not infrequently, the approver in our project undertook to distribute the invitation email, or have it distributed without providing further information or the name and contact details of the person who would be assigned this task. It was therefore impossible to follow up, and check whether indeed the task had been carried out. It was not appropriate to follow up the approver, particularly as that person was generally in a position of such high authority and there was a significant imbalance of power between this position of high authority and a PhD researcher. There were no known responses from two universities where approval had been granted and very low numbers from some others; it is possible that the invitations might not have been extended at these organisations.

### **Best Practices**

Our recommendations for change are summarised in Table 3 and discussed below.

**Table 3.**  
**Recommendations Arising from this Research**

|   |  |
|---|--|
| 1 | Remove “blanket” requirement for institutional gatekeeper approval                           |
| 2 | Introduce requirement to inform gatekeepers at universities about proposed external research |
| 3 | Establish an independent body at each university to manage requests for external research    |
| 4 | Amend HREC ethics application forms to provide for further explanation                       |

Our key recommendation is that the HREC’s requirement for approval on behalf of an institution to conduct research be waived where researchers can demonstrate that target participants are not drawn from vulnerable groups and are in a position to make their own decision. Our research has focused on universities and research institutes; this recommendation is almost certainly applicable for many other types of institution where

the target population is not at risk and the proposed research does not place the institution at unmerited risk.

It is noted that distribution, by a university staff member, of an invitation to take part in third party research, could be seen to be implied endorsement of the research, however it is assumed that if the recipient of the initial request is uncomfortable about passing it on, they will either seek further advice or choose not to proceed.

If it is deemed beneficial for the university to know in advance about ethically approved research in which its staff might become involved, perhaps a letter of advice detailing proposed plans addressed to the gatekeeper might be deemed sufficient. This letter could provide the gatekeeper with time to make further enquiries; an opt-out option could additionally permit them to deny access to staff or students if they were uncomfortable with the request. A copy of the letter to the gatekeeper could be included in communication with relevant staff members and could thus have a bearing on that staff member's decision to act on the request, or otherwise.

We recommend that all universities should establish an objective body to manage requests for external research. This body could manage internal systems to provide gatekeeper approvals for research conducted by outsiders for the occasions where gatekeeper approval is warranted, along the lines of those established at Curtin University (Curtin Survey Approvals) and the University of Adelaide (Learning & Quality Support (LQS) in the Division of Academic and Student Engagement) for their internal research.

Further, we recommend that the application forms used by the HRECs in Australia be amended to permit researchers to offer further explanation about the nature of the potential participants, their vulnerabilities, and their capacity to freely make a consent decision so that ethics requirements for gatekeeper/institutional approval are

imposed only when it will strengthen the protection of participants and deliver the intent behind guidelines 2.2.1 and 2.2.13 in the National Statement. The HRECs would still be able to ensure that participation is voluntary and based on sufficient information and adequate understanding of the research, and that, in the case of some particular organisation types, properly interested parties are appropriately informed.

### **Educational Implications**

This case study shows that achieving gatekeeper approval from universities is problematic and a barrier to research of this nature. It is often difficult, or impossible, to reach the person who should be responsible for making the ultimate decision, yet without that permission the research may not proceed, even though it is unlikely to provide a risk to either the participants or to the institutions. In parallel, it is difficult to identify the process required to obtain approval in each individual university; they are all different. The establishment of an objective body within each university, recommended above, to provide gatekeeper approval for, or receive advice about, any proposed research on aspects of the institution itself would help remove this barrier.

We have demonstrated the superfluity of the gatekeeper approval requirement, given that recruitment by social media provided an ethically approved and moderately successful process to recruit participants. Although it is difficult to target participants via broad-reach social media platforms such as Twitter, recruitment via social media certainly has the reach to overcome insurmountable gatekeeper barriers. An exploration of structured groups within social media platforms could sometimes be of benefit for more specific recruitment outcomes.

### **Research Agenda**

Gatekeepers who control access to research participants are in a powerful position. We support the view of Walker & Read (2011) that while gatekeepers provide an essential service in protecting a vulnerable population, they can potentially prevent potential participants from speaking for themselves or exercising agency in their own right. As mentioned above, we seek to add to literature that investigates aspects of research ethics governance (Emmerich, 2016; Hedgecoe, 2016), especially with respect to social science research (Dingwall, 2008; Schrag, 2011) and to that literature which examines situations in which human research ethics committees might be considered as having gone outside their responsibilities (Guillemin et al., 2012; Scott et al., 2020).

As we have shown, the need for institutional approval from a university, prior to distributing invitations to their staff to participate in a research survey, acted as a barrier to recruitment without providing an ethical benefit to the research. Our situation is likely be indicative of the experiences of others wishing to conduct research with university staff in multiple institutions. It would be of particular interest to seek further information about experiences of others with regard to research conducted with staff across multiple universities.

A limitation of this study, due to the nature of the recruitment which involved distribution by third parties, is that it is not possible to know the response rate to either requests which were actually received by the correct gatekeeper or to invitations received by potential participants.



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