

Conducting research in countries other than Australia – Guidelines

When an Australian researcher plans to conduct research in another country, there are additional ethical issues to consider. People in the other country may have different cultural values, beliefs, and customs from those described in the [National Statement on Ethical Conduct in Human Research](#) (NS). Sometimes these local values may be in tension with Australian ethical principles.

The aim of this document is to provide guidelines to support researchers and reviewers alike to ensure that ethical review of research at ECU is consistent with the NS, in addition to external obligations. While participants in other countries were previously considered a vulnerable population requiring research conducted with this cohort to be reviewed by the Human Research Ethics Committee (HREC), the 2025 NS stresses that the review pathway should be determined by the risk to participants as well as the research context (NS, Chapter 4.6).

It is important to note that other countries may also have laws or ethics requirements that differ from, or perhaps be in tension with, the NS. When this happens, researchers must think carefully about how to handle these differences and follow the guidance of Chapter 4.6 of the NS and provide clear explanations in their ethics application.

Guidelines:

- Where research involving people in other countries is presented to ECU for ethical review, Chapter 4.6 of the NS always applies.
- For all research activities where ECU is the lead institution, ECU will provide ethical oversight and monitoring of these research activities.
- For all ECU-led research, the level of ethical review required will be determined by the risk profile and research context (this includes, but is not limited to, considerations of potential enterprise risk, Australian Government sanctions and restricted-dealings determinations). This applies to:
 - Research where ECU is the ONLY institution involved (i.e. no other Australian or international institution, agency or organisation is involved).
 - Research where ECU is the lead organisation, AND research involves other parties who will be collecting data or leading the research within other countries that do not have a process for ethical review.
- Research where ECU is NOT the lead institution:
 - Reciprocation of ethics approval, pursuant to the Executive Review Procedures, may be appropriate when it can be established that the review with the international partner organisation has been conducted in accordance with the requirements of the NS.. Copies of the original application form and ethics approval are required to be submitted as part of the reciprocal ethics application. If the original documentation is in a language other than English, translated documents must be provided.
 - If the lead organisation's ethical review is not consistent with the NS, the ECU lead researcher should submit a full application addressing chapter 4.6 of the NS.

- Research conducted in collaboration with institutions may require robust agreements, including, but not limited to, data-sharing agreements. For further information and support, please contact research-grants@ecu.edu.au.
- Research conducted with participants residing in the USA and Canada requires specific insurance cover. The ethics office will organise this before ethical approval can be issued for the research project.
- Research in Indonesia requires specific permissions. Researchers need to organise this as appropriate. Please refer to [Indonesia – permits for foreign researchers](#) for more information.
- Researchers conducting research in Europe might be subject to the General Data Protection Regulation (GDPR). Please refer to [General Data Protection Regulation \(GDPR\) and Australian research](#) for further information.

Further information:

1. [National Statement on Ethical Conduct in Human Research \(2025\)](#)
2. [Governance of Research - Home](#)
3. Collecting research data in the European Union – [General Data Protection Regulation \(GDPR\) and Australian research](#)
4. [International Compliance Reviews](#)
5. [Sanctioned Countries List](#)
6. [Indonesia – permits for foreign researchers](#)

Accountabilities and responsibilities

This document was developed by Research Services and will be updated as per the approved review cycle for guidance documents.

The Guideline Owner has overall responsibility for the content of these guidelines and their operation.

Contact information

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APPENDIX

National Statement on Ethical Conduct in Human Research (2025) Chapter 4.6: Research conducted in other countries

Introduction

When a researcher from an Australian institution proposes to conduct research in another country, additional ethical considerations may arise. In some situations, regard for the values, beliefs, customs and cultural heritage of research participants in other countries will require recognition of values other than those in the National Statement. There may be times when these other values will be in tension with one or more of the values of the National Statement. The legal, regulatory or ethics review processes of another country may also demand conduct that is in tension with the values of the National Statement. The guidelines in this chapter must be considered when addressing these tensions.

It is important that appropriate and sufficient respect is accorded to participants involved in research taking place in other countries and that appropriate and sufficient measures are in place to safeguard the wellbeing and interests of these participants.

Those with responsibility for oversight of research conducted in other countries must ensure that appropriate research governance processes are in place to authorise and monitor this research.

Guidelines

4.6.1 When conducting research overseas, Australian researchers must adhere to the requirements of the National Statement.

4.6.2 The design and conduct of the research should also recognise local cultural values and expectations, in particular what researchers and research participants expect from one another. This recognition should demonstrate that participants will be accorded no less respect and protection than the National Statement requires.

4.6.3 Researchers should demonstrate respect and satisfy the requirements of paragraphs 1.10 to 1.13 in the design, conduct and monitoring of overseas research by:

(a) taking into account local beliefs and practices, including those related to recruitment, consent and remuneration of participants or contributions to communities for participating in research

(b) undertaking ongoing consultation and engagement with the local participant population and the communities to which they belong.

4.6.4 The distribution of the benefits, risks and burdens of overseas research for the participants and the broader community should be equitable and should be considered acceptable by local standards.

4.6.5 Researchers should be familiar with the communities in which they plan to conduct their research, demonstrate how they will engage with the potential participants, and be able to assess the benefits of their research to these participants and communities and the risks and burdens that may be placed upon them. Researchers need to take account of any political, social and cultural factors that may jeopardise the safety, wellbeing or interests of the participants.

4.6.6 The conduct of research overseas should take into account the opinions and expectations of participants and their communities about the impact of any resource limitations on the:

- (a) way the research will be conducted
- (b) wellbeing of participants after the research is completed
- (c) application of the outcomes of the research.

This guidance applies to resources brought to the project by the research team or the existing local resources or both.

4.6.7 Researchers conducting research overseas should inform Human Research Ethics Committees (HRECs) or other ethics review bodies in Australia:

- (a) whether there are ethics approval or other authorisation processes that are relevant to that research in each country in which they intend to conduct research
- (b) whether any such processes are mandatory or voluntary in relation to the proposed research and, to the extent appropriate, how such processes operate
- (c) whether the approval by the Australian HREC or other ethics review body is required to be reported to comply with the processes outlined in (a) and (b).

4.6.8 Where there are no relevant ethics approval processes in a country where the research will be conducted, the Australian HREC or other ethics review body should apply the principles and relevant guidelines of the National Statement, with additional regard for the outcomes of consultation and engagement with the local participant population and the communities to which they belong.

4.6.9 Researchers conducting overseas research should comply with any requirements set by funders or government bodies that direct them to conform to the standards of overseas institutions or recognised international guidelines or instruments.

4.6.10 Researchers should ensure that they are aware of and comply with any relevant legal requirements for research or engagement with local populations in any country in which they intend to do their research.

4.6.11 Researchers who plan to diverge from local expectations and requirements in the conduct of their research must disclose and justify this to reviewers, who will consider the rationale provided.

4.6.12 When co-researchers are to be recruited overseas, Australian researchers should inform the HREC or other ethics review body of the co-researchers' capacity and expertise to conduct that part of the research assigned to them or how such capacity and expertise will be established. There should also be consideration of the benefits for the co-researchers during and after the project.

4.6.13 Australian researchers must ensure that any overseas co-researchers will carry out the research in a way that accords participants the respect and consideration required by the National Statement.

4.6.14 Conducting research in other countries can expose researchers to risk of harm. Institutions and researchers should try to identify and evaluate any such risks and minimise, mitigate and manage these risks. This may include establishing local academic or institutional affiliations, local networks or other support structures.

4.6.15 When research is to be conducted overseas by a researcher who is under academic supervision within Australia, researchers should inform the Australian HREC or other ethics review body of how that supervision is to be provided.

4.6.16 Reviewers should consider:

(a) whether researchers have sufficient experience or access to expertise to enable them to engage with participants in ways that accord participants the respect and consideration to which they are entitled

(b) whether the researchers' plan for engagement with the potential participants, and their assessment of the benefits, risks and burdens of their research, are adequate and properly reflect the values of the National Statement and any local standards and expectations.

4.6.17 To address any questions, concerns or complaints from participants, researchers and

reviewers should ensure that arrangements have been made for:

- (a) a local and readily accessible contact who is available to participants to receive questions and complaints about the research
- (b) clear communication between the local contact and the research team so that the researchers can promptly respond to any questions, concerns or complaints
- (c) a process for participants to contact the research team and/or the reviewing HREC or ethics review body if there is no viable local contact available
- (d) a process independent of the research team for dealing with any complaints (see Chapter 5.7 and the Australian Code for the Responsible Conduct of Research).