

Title	Guidelines for Third- Party Vendor Reimbursement and Compensation in Research
Original Issue Date:	30 March 2025
Revised:	
Approved By:	REB Chair

## 1.0 PURPOSE

This document is to provide guidance on the use of third-party vendor reimbursement and compensation services in research. REB approval must be obtained prior to using third-party vendors for these purposes.

## 2.0 Definitions

**Compensation:** Money or items given to the research participant that acknowledges the time and effort they have provided in participating in the research.

**Incentive:** Anything offered to participants, monetary or otherwise, to encourage participation in research.

**Reimbursement:** Payment to participants to ensure that they are not put at a direct, or indirect, financial disadvantage for the time and inconvenience of participation in research. Direct expenses refer to the costs incurred, and indirect expenses refer to losses that arise because of research participation.

**Third-Party Vendor:** An external organization contracted to provide specific services. They may provide services for travel arrangements and participant reimbursement services.

## 3.0 PRINCIPLES

- 1) If possible, it is suggested that participant reimbursement and compensation be managed locally. However, it is noted that for some studies, this may place a burden on participants as the local reimbursement process can sometimes be time-consuming. Third- party vendors can be used if it will make it easier to reimburse expenses over prolonged visits or more complicated expenses.
- 2) Any research participant who does not wish to use a Third-party vendor service must still be accommodated so that it is not a barrier to recruitment.

- 3) Third-party vendors often require the collection of personal information from study participants to utilize their services. Research teams should collect the **least amount** of identifiable data required to provide this service to participants.
- 4) Information on research participants collected for third-party vendor reimbursement cannot be used for any other purpose; and there must be a time limit on how long the vendor can hold the information before purging and providing a summary report to the study locally to keep with other research materials for the required time.
- 5) Privacy breaches are subject to the same reporting requirements as protocol deviations.

The REB will review third-party services for the level of sensitivity of the data being required of participants (i.e., Full name, DOB, SIN), as well as the location of the data servers for the third-party vendor (i.e., within Canada versus outside of Canada).

To obtain approval for the use of third-party vendors, please consider the following and ensure this information is included in the participant consent form and the eREB ethics application, as appropriate.

Information required	Participant Consent form	eREB Initial Application Section (Please select Q125i Online Data collection Tools, additional information can be uploaded in Q241)
Is it mandatory to use this vendor? Do participants have other options?	YES	Q239
What is the name and address of the third-party vendor?	YES	Q239
Are there agreements in place between the Sponsor and the third party vendor? And if so which legal jurisdiction do they fall under?	YES	Q240
What specific services will the vendor be providing?	YES	Q239
What data will they be collecting?	YES	Q240 Please ensure each identifier is clearly outlined
Provide a justification for the collection of all data elements	YES	Q240
Who will have access to the data?	YES	Q240
Where will the data be kept?	YES	Q239
How long will the data be kept?	YES	Q239
What happens to the data at the end of the study?	YES - outline if data will be destroyed by the vendor at the end of the study AND if the	Q240

	participant withdraws early, what is the mechanism to have the data destroyed.	
Are there additional intended uses of the information? Do the uses continue beyond the immediate service?	YES- should be explicitly stated	Q240
Will advertising materials be sent to the participants?		Q240
What provisions are in place for Confidentiality and Data Security?	YES	Q240
Contact information if there is a concern regarding data handling or data breaches	YES	Q240

#### Information to add into consent form

*As part of this study, the Sponsor is using a third-party (**service/technology**) to **[insert description of third-party services and their purpose]**. If you participate in this research study, you will be asked to provide **[insert details about what the participant needs to provide, e.g., identifiable or banking information]**. Osler is not responsible or liable for any loss or damages of any sort incurred as a result of any dealings with the third-party service. You understand that your use of the third-party service is at your own risk. **Sharing personal and financial information online may increase the risk of unauthorized access to accounts, or potential misuse of your data.** If you are uncomfortable with the potential privacy risks, please inform the study team, and they will explain your alternatives."*

## 4.0 REVISION HISTORY

Effective Date	Summary of Changes
30 March 2025	Original version

## 5.0 References

Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans, December 2022.  
<https://ethics.gc.ca/eng/documents/tcps2-2022-en.pdf>