



Classroom Research Ethics in Brazil: Timing, Boundaries, and Safeguards

Entre ensino e pesquisa: análise das normas éticas para o professor-pesquisador no Brasil



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Abstract

This article analyzes the presence, clarity, and school applicability of the Brazilian ethical-regulatory framework governing research conducted by teachers with their own students. Specifically, it examines whether current regulations provide sufficiently clear and operational guidance regarding four key dimensions: prior ethical review, the boundary between pedagogical activity and research, safeguards for teacher-student relationships, and data governance in educational contexts. We analyzed CNS Resolutions 466/2012, 510/2016, and 674/2022, and Law 14,874/2024 using eleven analytical questions addressing ethical approval timing, teacher-student relationship safeguards, consent and assent, data governance, and return of results. Findings show that voluntariness, consent, assent, and privacy protection are consolidated, yet ambiguities remain regarding when to submit studies to the Research Ethics Committee, how to distinguish pedagogical activity from research, and which operational safeguards mitigate classroom power asymmetries. We also note gaps in defining minimal risk and in standardizing procedures for common low-risk school scenarios, such as using pedagogical records. Overall, the regulatory instruments define the ethical “what,” but greater clarity on the “how” is required to ensure feasible, consistent application in everyday school practice and to support teacher-researchers.



Resumo

Este artigo analisa a presença, a clareza e a aplicabilidade ao contexto escolar do marco ético-regulatório brasileiro que rege pesquisas conduzidas por professores com seus próprios alunos. Especificamente, examina se as normas vigentes oferecem orientação suficientemente clara e operacional em quatro dimensões centrais: a aprovação ética prévia, a fronteira entre atividade pedagógica e pesquisa, as salvaguardas para a relação professor-aluno e a governança de dados em contextos educacionais. Foram analisadas as Resoluções CNS nº 466/2012, nº 510/2016 e nº 674/2022, bem como a Lei nº 14.874/2024, com base em onze questões analíticas relativas ao momento da submissão ética, às salvaguardas na relação professor-aluno, ao consentimento e assentimento, à governança de dados e à devolutiva dos resultados. Os resultados mostram que voluntariedade, consentimento, assentimento e proteção da privacidade estão consolidados, persistem, porém, ambiguidades quanto ao momento de submissão dos estudos ao Comitê de Ética em Pesquisa, à distinção entre atividade pedagógica e pesquisa e às salvaguardas operacionais capazes de mitigar assimetrias de poder em sala de aula. Também identificamos lacunas na definição de risco mínimo e na padronização de procedimentos para cenários escolares comuns de baixo risco, como o uso de registros pedagógicos. Em conjunto, os instrumentos normativos definem o “o quê” ético, mas ainda requerem maior clareza quanto ao “como”, a fim de assegurar aplicação viável e consistente na prática escolar cotidiana e dar suporte ao professor-pesquisador.



Key words

Research ethics; teacher researcher; ethics committee; consent; educational research; Brazilian legislation.

Ética em pesquisa; professor-pesquisador; comitê de ética; consentimento; pesquisa educacional; legislação brasileira.



Fechas

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1. Theoretical Framework

The international discussion on ethics in educational research has consolidated widely accepted principles, such as respect for persons, voluntariness, informed consent, age-appropriate assent, the right to withdraw, responsible data management, and the return of results to participating communities. Foundational documents, such as the codes of the American Educational Research Association and the British Educational Research Association, reinforce the centrality of these principles and urge attention to the asymmetric relations that characterize school environments (AERA, 2011; BERA, 2018).

This debate connects to the tradition of practitioner inquiry, in which teaching is understood as the situated production of knowledge and research on practice forms part of professional identity

When research involves children and adolescents, the dilemmas become even more complex. In such cases, the literature indicates that consent and assent should be continuous, clear, and adapted to age to ensure genuinely voluntary participation (Alderson & Morrow, 2020; Morrow & Richards, 1996). It is also recommended to provide comprehensible feedback and to implement safeguards against the influence of teacher authority, for example data collection by third parties or a separation between assessment practices and research activities (Adler & Antezana, 2018; AERA, 2011; BERA, 2018; Menezes, 2023). These recommendations show that ethics in educational research cannot be limited to normative statements, it requires

practical mechanisms capable of protecting participants and strengthening the social legitimacy of inquiry.

This debate connects to the tradition of practitioner inquiry, in which teaching is understood as the situated production of knowledge and research on practice forms part of professional identity. Investigating the classroom does not simply add a scientific dimension to teaching, it represents a process of teacher development that links action, reflection, and feedback to the school community (Cochran-Smith & Lytle, 2015; Fagundes, 2016; Gatti, 2010; Somekh & Noffke, 2009). Methodologies such as action research, organized in iterative cycles of planning, intervention, observation, and analysis, illustrate this intertwining between professional development and knowledge production (Franco, 2005; Thiollent, 2025; Toledo & Jacobi, 2013). This entanglement brings ethical and methodological dilemmas, because teachers must balance pedagogical responsibilities, institutional demands, and the role of researcher in a context marked by relations of authority (André, 2001; Gatti, 2010; Lüdke & André, 2013; Menezes, 2023).

In Brazil, the regulation of research ethics is coordinated by the CEP/Conep System. The system emerged in the early 1990s in the health sector, with Resolution CNS No. 196/1996 as a key reference, later replaced by Resolution CNS No. 466/2012 (CNS, 1996; CNS, 2012). This document consolidated fundamental principles for research with human beings, yet it remained anchored in a biomedical paradigm, with emphasis on physical risks, formal consent, and clinical protocols.



In response to critiques regarding the inadequacy of this model for the Human and Social Sciences, Resolution CNS No. 510/2016 was enacted and is considered a milestone for the field. The regulation recognized the specificity of HSS, distinguished it from biomedical practices, and provided diversified forms of consent and assent, as well as the possibility of waivers in exclusively pedagogical situations (CNS, 2016). This change responded to historical demands from researchers and institutions and aligned Brazil with international debates about flexibility and contextualization of ethical procedures (Guerriero, 2016; Guerriero & Minayo, 2019; Mainardes, 2017).

The concept of minimal risk remains weakly delimited, the boundary between teaching and research remains ambiguous, and the requirement of prior submission is not always compatible with the emergence of scientific purposes during pedagogical practice

More recently, Resolution CNS No. 674/2022 updated the structure of the CEP/Conep System and sought to improve the processing and evaluation flows for protocols (CNS, 2022). Despite this standardization effort, divergences among committees persist, especially in the treatment of educational research, which generates uncertainty for teachers who investigate their own practices. In 2024, Law No. 14,874 established the National System of Ethics in Research with Human Beings, expanded the legal reach, and reinforced the need for greater transparency and safeguards. However, the law depends on complementary regulations to offer directives applicable to basic education routines, particularly for low-risk studies and the use of school records (Brasil, 2024).

These norms reveal significant advances, although they leave open issues that relate to dilemmas already identified in the literature. The concept of minimal risk remains weakly delimited, the boundary between teaching and research remains ambiguous, and the requirement of prior submission is not always compatible with the emergence of scientific purposes during pedagogical practice (Franco, 2005; Kemmis et al., 2014; Thiollent, 2025). The need for specific safeguards, such as pedagogically meaningful feedback, consent and assent tailored to the school context, and strategies to mitigate teacher authority, remains central to the debate (Adler & Antezana, 2018; BERA, 2018; Menezes, 2023).

Another fundamental axis is the governance of educational data. As in international discussions on research ethics, Brazil has incorporated into its legislation concerns with privacy and the security of personal information, especially for children and adolescents, through the General Data Protection Law, Lei Geral de Proteção de Dados Pessoais, Law No. 13,709/2018 (Brasil, 2018). The statute establishes principles such as necessity, data minimization, purpose, and transparency. In school settings, however, reidentification remains plausible in small classes or longitudinal records, which reinforces the importance of protocols that specify a legal basis, reduction of identifiers, retention and disposal timelines, and clear, socially relevant feedback of results (ANPEd, 2019; BERA, 2018; Brasil, 2018).

In sum, the national and international literature recognizes the centrality of ethical principles in educational research. The Brazilian challenge does not lie in the absence of such principles; it lies in defining operational parameters that make them applicable to everyday teaching practice. Clarifying the boundary between teaching and research,



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establishing predictable criteria for ethical submission, ensuring safeguards against power asymmetries, and adopting robust data-governance plans are essential steps to strengthen the ethical consistency and social legitimacy of research conducted by teachers (ANPEd, 2019; Brasil, 2018, 2024; CNS, 2016, 2022; Cochran-Smith & Lytle, 2015; Franco, 2005; Gatti, 2010; Guerriero, 2016, 2023; Guerriero & Minayo, 2019; Kemmis et al., 2014; Lüdke, 2001; Lüdke & André, 2013; Mainardes, 2017; Menezes, 2023; Somekh & Noffke, 2009; Toledo & Jacobi, 2013).

Although Brazilian regulations establish core ethical principles for research involving human participants, it remains unclear how operationally applicable these norms are to studies conducted by teachers with their own students in school settings. This article aims to analyze the presence, clarity, and school applicability of the Brazilian ethical-regulatory framework governing research conducted by teachers with their own students, focusing on four dimensions: prior ethical approval, the boundary between pedagogical activity and research, safeguards for teacher–student relationships, and data governance in educational contexts.

2. Materials and Methods

This study adopts documentary research as its methodological basis, since its empirical material consists of official legal and regulatory texts. In documentary research, documents are understood not merely as sources of information, but as institutional records that define concepts, prescribe procedures, and delimit responsibilities (Bowen, 2009). The study therefore analyzes the Brazilian ethical-regulatory framework as a corpus of normative texts whose wording, structure, and procedural implications can be examined systematically in relation to research conducted by teachers with their own students. The analytical strategy was qualitative and comparative, guided by directed content analysis, which is appropriate when categories are established *a priori* from the research objective and the dimensions under investigation (Hsieh & Shannon, 2005).

2.1. Normative corpus and inclusion criteria

We analyzed CNS Resolution No. 466/2012 (CNS, 2012), CNS Resolution No. 510/2016 (CNS, 2016), CNS Resolution No. 674/2022 (CNS, 2022), and Law No. 14,874/2024 (Brasil, 2024). These were selected due to their direct relevance to research with human participants in educational settings, nationwide applicability, and normative status in Brazil. Sectoral biomedical regulations without school adherence were excluded. The timeline of validity is as follows: Resolution 466/2012 entered into force on June 13, 2013 (CNS, 2012); Resolution 510/2016 was published on May 24, 2016 (CNS, 2016);



Resolution 674/2022 was published on October 25, 2022 and later republished with editorial corrections (CNS, 2022); Law No. 14,874/2024 entered into force in August 2024, with vetoed parts later promulgated on July 1, 2025, without altering the core treatment of educational research (Brasil, 2024).

2.2. Unit of analysis and analytical questions

The unit of analysis was the normative provision, comprising article, paragraph, item, and subitem. Extraction was guided by 11 predefined analytical questions aligned with the study objective. The questions cover the following: core concepts and definitions; requirement of prior ethical approval; safeguards in the teacher-student relationship; consent and assent in school settings; conduct of low-risk classroom research; internal coherence and consistency across norms; vagueness, ambiguities, and overlaps; linkage to regular teaching activity; researcher responsibilities; the role of institutions; and feedback and social benefit (CNS, 2012; CNS, 2016; CNS, 2022; Brasil, 2024).

2.3. Operationalization of judgment criteria

For each analytical question, three dimensions were coded: presence, clarity, and school applicability. Presence was classified as absent, implicitly present, or explicitly present

For each analytical question, three dimensions were coded: presence, clarity, and school applicability. Presence was classified as absent, implicitly present, or explicitly present. Clarity was classified as low, moderate, or high, considering whether the text is self-explanatory, defines terms and indicates procedures, whether it depends on cross-references to other norms, or whether it contains ambiguous wording. School applicability was classified as direct, indirect, or not applicable. We also recorded whether the guidance was principled, procedural, or definitional, and we flagged ambiguities, gaps, and overlaps with a brief justification and a short quotation of the corresponding provision (CNS, 2016; CNS, 2022).

2.4. Procedures for collection and extraction

Full texts were obtained from official repositories. For each norm, we built an extraction spreadsheet containing provision identifiers, short verbatim excerpts when necessary, internal and external cross-references, mapping to the 11 questions, and the codes for presence, clarity, and applicability, along with analytic notes. A pilot round was conducted with Resolution 510/2016 to refine categories and coding examples, followed by full extraction for all four norms (CNS, 2016; CNS, 2022).



2.5. Analytical strategy

As a test of applicability, we developed standardized micro-cases that simulate recurrent school situations to verify the sufficiency of normative guidance for practical decisions by teacher-researchers

The analysis proceeded in two stages. In the intra-document stage, we assessed internal coherence among provisions and the linkage between definitions, principles, and procedures within each norm. In the inter-document stage, we compared convergences and divergences among the four norms, with emphasis on core terms, the boundary between teaching and research, and safeguards specific to authority relations between teachers and students. A comparative matrix was produced for each analytical question, from which narrative syntheses were derived and anchored in specific articles. As a test of applicability, we developed standardized micro-cases that simulate recurrent school situations to verify the sufficiency of

normative guidance for practical decisions by teacher-researchers (CNS, 2012; CNS, 2016; CNS, 2022; Brasil, 2024).

2.6. Ethical considerations

The analysis concerns public documents and involved no collection of data from human participants. It is therefore exempt from submission to the CEP/Conep System under the rules for the use of public-domain information in the Human and Social Sciences (CNS, 2016; CNS, 2022). Even so, we maintained transparent documentation of the analytic protocol and decision criteria, as well as a commitment to the fidelity of quotations and cross-references.

3. Findings from the Comparative Reading

The reading of the four instruments indicates convergence around common pillars. All condition participation on voluntariness and free and informed consent, guarantee the right to withdraw, and protect privacy and confidentiality, with wording that varies across texts (CNS, 2012, 2016, 2022; Brasil, 2024).

At the conceptual level, the corpus defines the scope and limits of research with human participants in Brazil. Resolution 510/2016 recognizes the specificities of the Human and Social Sciences, distinguishes pedagogical from scientific purposes, and provides for waivers in teaching activities with no research purpose. Resolution 466/2012 sets general bioethical foundations and broad definitions of participant, risk, and social relevance. Resolution 674/2022 organizes processing within the CEP/Conep System by study typification and modulation factors and recognizes procedures common in schools, such as participant observation and action research. Law 14,874/2024 codifies principles and general rules, including prior ethical review.



In risk treatment, Resolution 466/2012 guides the assessment of risks and benefits, with attention to vulnerable groups, though it does not define minimal risk

Regarding consent, assent, and data protection, Resolution 466/2012 details the Free and Informed Consent Form, guarantees the right to refuse or withdraw at any time, and establishes duties of information and assistance. Resolution 510/2016 complements this understanding by defining consent procedures and allowing records in different formats adapted to the participants' reality. Resolution 674/2022 includes, as modulation factors, situations that allow differentiated formats or waiver of consent, provided they are duly justified and approved. Law 14,874/2024 consolidates the concept of consent and strengthens governance and personal data protection mechanisms.

In risk treatment, Resolution 466/2012 guides the assessment of risks and benefits, with attention to vulnerable groups, though it does not define minimal risk. Resolution 510/2016 advances the framework by establishing levels of risk, including minimal risk, and by focusing evaluation on methodological procedures to avoid intensifying vulnerabilities. Resolution 674/2022 replaces risk gradation with study typification and modulation factors, directly influencing processing routes and documentation requirements. Law 14,874/2024 consolidates principles, responsibilities, and safeguards, especially regarding consent and data protection.

All instruments mandate ethical approval before research begins. Resolution 466/2012 requires awaiting approval; Resolution 510/2016 reiterates this duty; Resolution 674/2022 operationalizes it through processing routes and timelines. Law 14,874/2024 reaffirms the requirement, prohibiting retroactive submissions.

The waiver for exclusively pedagogical activities remains in force (CNS, 2016, 2022). The decisive criterion is purpose: if research intent arises during an educational activity, submission to CEP/Conep becomes mandatory, and data collection must await approval (CNS, 2022).

When teachers research their own students, the instruments acknowledge pedagogical asymmetry and require safeguards. Resolution 466/2012 mandates reinforced protection of consent for individuals under authority; Resolution 510/2016 requires special care in authority relationships and details formats of consent and assent; Resolution 674/2022 treats the teacher–student relationship as a modulation factor. Law 14,874/2024 reaffirms consent, withdrawal rights, and assent for children and adolescents.

Consent and assent requirements are applicable in schools. Resolution 466/2012 defines the consent and assent forms and requires legal guardian consent and student assent when applicable. Resolution 510/2016 emphasizes consent as a process, allows records in written, audio, or image formats, and guarantees participant access to results. Resolution 674/2022 includes hypotheses for differentiated formats, consent *a posteriori*, or waiver, subject to approval. Law 14,874/2024 regulates consent and allows an impartial witness when necessary, reinforcing privacy and confidentiality.

For low-risk classroom research, the legal framework offers criteria to size risk and define the processing route. Resolution 466/2012 establishes risk–benefit balancing



and proportionality. Resolution 510/2016 focuses evaluation on procedures generating harm beyond everyday life and provides for waiver in exclusively pedagogical activities. Resolution 674/2022 links processing to Types A, B, and C and allows express or simplified routes for common school procedures such as observation, interviews, and questionnaires, subject to modulation factors. Law 14,874/2024 codifies prior ethical analysis, favorable risk–benefit assessment, and privacy safeguards as a baseline.

Internal coherence is broad. Resolutions 466/2012 and 510/2016 converge on principles, prior approval, and separation of ethical from scientific review. Resolution 674/2022 harmonizes language by moving from risk gradation to typification and recognizes methods common in schools. Law 14,874/2024 consolidates requirements for prior ethical analysis, consent, and confidentiality.

The Brazilian regulatory framework provides a solid set of ethical principles for research with human participants. Its application in schools, when teachers investigate their own practice, remains marked by operational ambiguity

Gray zones remain: minimal risk is not operationally defined in 466/2012, the boundary between teaching and research is still porous, and safeguards for authority relations are treated generally. Criteria for waiver of consent and consent *a posteriori* lack minimal common parameters.

Responsibilities fall on the principal investigator, who must await approval, prepare consent forms, follow approved procedures, report changes, and retain data for five years. Resolution 674/2022 organizes management of amendments

and deadlines. Law 14,874/2024 lists statutory duties, including reports, adverse event communication, and protection of participants' rights.

At the institutional level, the instruments assign roles to proposing and co-participating institutions, regulate CEP operation, and separate ethical from scientific review. Law 14,874/2024 requires training of committee members, institutional custody of data, and assistance to participants in case of harm. There is generally no requirement for school principal authorization beyond ethical approval.

Finally, feedback and social benefit evolve from principle to operational duty: Resolution 466/2012 links social relevance to the return of benefits, Resolution 510/2016 requires that participants have access to results, Resolution 674/2022 mandates communication in clear language, and Law 14,874/2024 reaffirms this obligation.

4. Discussion

The Brazilian regulatory framework provides a solid set of ethical principles for research with human participants. Its application in schools, when teachers investigate their own practice, remains marked by operational ambiguity. The core problem is not the absence of principles. Voluntariness, consent, and data protection are well established. The challenge lies in the lack of practical criteria for typical classroom situations. This results in uncertainty about the exact moment for submission to the ethics committee,



about the boundary between pedagogical activity and research, and about how to mitigate, in everyday routines, the power asymmetry between teacher and student.

The first tension is conceptual. Everyday school research usually involves low-risk procedures such as observation, brief questionnaires, and action research. The regulatory language does not stabilize a simple rubric for classifying them. Replacing risk gradation with protocol typification improved systemic coherence, although it did not deliver sufficient predictability for teachers who need to decide quickly what their study is and how it should be processed (Guerriero & Minayo, 2019; Mainardes, 2017; CNS, 2022).

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The second tension is temporal. School-based research is iterative and adjusts in short cycles, whereas prior approval, which is ethically correct, must align with a rigid school calendar and often overburdened committees. The framework recognizes that a scientific purpose may emerge during activities that were initially pedagogical. When that happens, the activity becomes research and therefore requires prior ethical submission and approval, with parental consent and student assent when applicable, explicit attention to authority relations, and a plan for feedback to participants. The system mandates submission of the protocol to CEP/Conep, does not authorize retroactivity, and preserves the requirement of approval in advance. From that moment on, any new data collection can only occur after a favorable opinion (CNS, 2012; CNS, 2016; CNS, 2022). In practice, this architecture can operate as a temporal trigger that pressures teacher-researchers, especially in action-research cycles and instrument adjustments, which helps explain reports of attempts at ex post submission.

In contrast, observations carried out exclusively for pedagogical purposes, with no scientific aim and no public disclosure of data, constitute teaching activity that is exempt from submission. Keeping a clear internal record of that purpose is advisable. If the intention arises to incorporate results into a research project, submission to the CEP/Conep System becomes mandatory before any use of such data (CNS, 2016, sole paragraph of Article 1, item VIII; CNS, 2022, Article 26, item VIII, b). By comparison, action-research projects with a publication perspective, including field notes and participant observation, constitute research and require prior approval, consent and assent when pertinent, and analysis of the teacher–student relationship as a modulation factor. In general, they remain in Type A, with the processing route defined by the ethics committee according to study design and perceived risk (CNS, 2022, Articles 7; 10, item I, f; and 13, paragraph 1).

Without operational tools that anticipate foreseeable micro-adjustments, for example pre-approved questionnaire versions included in the protocol, and given tight timelines, a bottleneck emerges. Teachers reduce scope, postpone data collection, or interpret the provision expansively to justify late submission. Greater textual clarity and practical guides, such as amendment templates for expected adjustments or timelines aligned to the school year, could reduce this uncertainty (CNS, 2022; Guerriero, 2019).



The third tension is relational. Consent works on paper, yet it is fragile when students decide under the unavoidable influence of a teacher who also evaluates them. The rules call for special care, although they do not specify how to organize it. Without minimum routines, such as invitations delivered by a non-evaluating third party, consent collection outside assessment moments, and the offer of an equivalent alternative activity without penalty, systems risk producing consent that is formally valid and substantively fragile, with ethical and methodological consequences such as coerced participation and response bias. Evidence from other Latin American contexts reinforces this point. A study with teacher educators in Mexico and Bolivia showed that, even when preparing new teachers is the primary function, reflections on participant protection emphasized substantive safeguards, including the affective-emotional dimension and the prevention of coercion in vulnerable contexts (Adler & Antezana, 2018).

There is also the challenge of data governance. Even when ethical approval is obtained, schools operate under data-protection rules for children and adolescents that require minimization, security, and clear limits on use and sharing

There is also the challenge of data governance. Even when ethical approval is obtained, schools operate under data-protection rules for children and adolescents that require minimization, security, and clear limits on use and sharing (Brasil, 2018). In small classes, reidentification remains plausible, even in supposedly anonymized datasets and time series. Without an explicit data plan, a defined legal basis, protection techniques,

and retention and disposal timelines, compliance becomes vulnerable, and community trust is weakened as well (Silva & Sena, 2025).

At the institutional level, the federal instruments do not, as a general rule, require administrative authorization from the school principal beyond ethics approval. In practice, school leadership mediates access by controlling schedules, spaces, and communication with families. Ignoring that *de facto* governance generates friction, creates informal delays, and weakens feedback. Operational agreements with school management are therefore part of the success of any classroom study, even without a textual mandate to that effect (André, 2001; Lüdke & André, 2013).

Three core propositions derive from these tensions. First, when the scientific purpose is not defined before instruments are applied, the boundary between teaching and research becomes indeterminate and *ex post* submissions become more frequent. Second, the lack of an operational marker for the start of research in school settings, combined with the idea of preliminary stages, opens space for piloting with students without ethics approval, even when a scientific intention is emerging. Third, standardized safeguards for the teacher–student relationship, who invites, when to invite, and what equivalent no-penalty alternative is offered, would reduce ambiguity about timing and would strengthen substantive voluntariness.

The most effective solutions do not require changing the rules. They require creating intermediate layers of guidance. Technical notes tailored to school contexts can clarify practical criteria to characterize scientific purpose, the use of previously produced records, *a posteriori* consent in situations of genuine infeasibility, and examples of classification for recurrent scenarios. Cooperation agreements among universities,



school systems, and ethics committees can align timelines with the school calendar and establish clear channels of communication with schools.

While these layers are not in place, immediate choices can raise ethical standards without stalling research. Define the scientific purpose before any data collection with

In sum, the instruments already contain the ethical “what.”

They still need to deliver the operational “how” for the classroom. Without that, divergent readings about the moment of submission and the retroactive use of pedagogical records will persist

students. Plan for consent to be obtained by a third party and outside assessment contexts. Offer an equivalent pedagogical alternative and state it in the consent or assent form. Minimize identifiers at the source and set retention timelines. Anticipate expected amendments in the protocol. Build feedback into the study design. For low-risk studies, turning these practices into an institutional checklist can reduce variability across committees, give predictability to teachers, and protect students’ rights.

In sum, the instruments already contain the ethical “what.” They still need to deliver the operational “how” for the classroom. Without that, divergent readings about the moment of submission and the retroactive use of pedagogical records will persist. With clear routines and institutional agreements, it is possible to preserve the protection of participants and to

foster situated inquiry that is useful to schools, which is, after all, the *raison d’être* of educational research.

5. Conclusions

This study concludes that, although the Brazilian framework is solid in its principles, voluntariness, consent and assent, and privacy protection, it remains insufficiently clear at the operational level when research is conducted by teachers in their own classrooms. The most critical point, in light of the study’s objective, is the timing of submission. There is a directive that ethical approval must precede the start of research. In practice, however, the combination of the waiver for activities that are exclusively pedagogical and the wording that triggers submission when a scientific purpose emerges during a lesson has been interpreted as leaving room for *ex post* submissions.

That interpretation is not supported by any authorization for retroactive approval. Rather, it reveals the ambiguity teachers face when deciding the moment at which classroom records cease to be pedagogical documentation and become research data. This ambiguity is compounded by the absence of a normative definition of “minimal risk” and by the lack of standardized safeguards to mitigate the teacher-student asymmetry. As a result, decision making varies across Research Ethics Committees in precisely the most common school scenarios, observation, brief questionnaires, and action research.

The implications are direct. At the researcher level, it is advisable to define the scientific purpose in advance, to plan for consent to be obtained by a third party



At the researcher level, it is advisable to define the scientific purpose in advance, to plan for consent to be obtained by a third party who does not evaluate the student, to offer an equivalent alternative activity without penalty, to minimize identifiers at the source, and to anticipate expected amendments, such as alternative questionnaire versions, within the protocol

who does not evaluate the student, to offer an equivalent alternative activity without penalty, to minimize identifiers at the source, and to anticipate expected amendments, such as alternative questionnaire versions, within the protocol. At the institutional level, predictability improves with interpretive notes tailored to school contexts, for example the boundary between teaching and research, the use of preexisting records, criteria for situations of infeasibility, and typical classification examples. It also improves with cooperation agreements among universities, school systems, and ethics committees, including timelines compatible with the school calendar and clear communication channels with school leadership, and with implementation kits, templates for consent and assent forms in plain language, invitation scripts for third parties, lists of pedagogical alternatives, and feedback plans. These measures do not change the rules. They translate what already exists into clear routines, which is exactly what teachers need to make ethical and timely decisions.

5.1. Limitations and future directions

This is a documentary analysis. It examines the wording of the regulations without empirically analyzing committee decisions or regional implementation differences, therefore generalizations about decision practices should be made with caution. The scope focused on nationwide instruments related to research with human participants. Other sectoral or institutional guidelines may shape local application. Future updates may alter relevant passages, which will require versioning and reanalysis. The interface with data protection was addressed analytically, without a technical audit of school data plans. Future work should include: (i) comparative studies of ethics opinions for typical educational protocols, observation, questionnaires, and action research, (ii) surveys with teacher-researchers about timing and the boundary between teaching and research, and (iii) implementation trials that test the effects of standardized safeguards, third-party invitation, equivalent alternatives, and anticipatory micro-adjustments in the protocol, on substantive voluntariness, processing time, and the ethical quality of projects.

In sum, the instruments already provide the ethical “what.” What is missing is the operational “how” for schools. Making explicit the markers for the start of research and the minimum procedures for the teacher and student relationship is the necessary step to align regulatory clarity and applicability, which should reduce submissions after data collection and strengthen the legitimacy of educational research.



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