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The Busara Institutional Scientific and Ethical Review Committee: Critical infrastructure to support high-quality ethical research in the global majority

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Abbreviations and acronyms

Busara ISERC

Busara Institutional Scientific and Ethical
Review Committee

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At Busara, we were conducting a study investigating whether transferring a large sum of money to lower-income Kenyans (\$500 each) would improve people's economic and psychological well-being (Haushofer et al., 2020). The transfer of money was unconditional, which meant there were no strings attached – from our perspective and the perspective of our Global North research partners, the villagers could do whatever they wished with it. We implemented the study across several villages in Nakuru county, Kenya's third most populous county that cuts across the Great Rift Valley.

Although Nakuru is home to growth and opportunity, it is also home to great poverty: in the villages where the experiment occurred, most villagers earned less than USD 200 per month [editorial note: the median income was probably less than 100 USD¹].

Our study was a randomized experiment with a pure control group, meaning half the villagers did not receive the cash transfer. The problem was these control villagers did not know why. Thus, when the funds were administered after randomization, here is what the villagers outside the experimental group perceived: many of their friends, neighbors, rivals, and relatives suddenly received a windfall worth perhaps two and a half times their monthly earnings for reasons they did not understand. In contrast, they did not receive anything.

Some villagers were happy with this outcome because they could celebrate the good fortune of their friends and neighbors. However, others were distinctly unhappy – even envious. The result was utter chaos. Villagers who did not receive a payment, both in our control group and outside the experiment, started spreading rumors that the experiment had nefarious aims. For example, contrary to our intent that villagers perceive the money

as unconditional, some claimed that the money was ‘blood money’ (cf Schmidt 2022, see also Schmidt, this volume), which compelled the recipient to perform a blood sacrifice. Others claimed that the experiment was a plot concocted by satanic devil worshippers locally known as the Illuminati and that the money was an inducement to recruit villagers into their ranks. In some cases, the intense feelings of anger, envy, fear, and jealousy even escalated to the point of domestic violence, as some men discovered that their wives took part in the experiment – and therefore received more than two months’ earnings – without their knowledge. Tensions across the villages threatened to escalate into inter-household conflict. We therefore halted our activities during the study endline and spent some time trying to understand what had gone wrong and what we could have done to prevent it.

From *A Better How*, “Manage relationships when starting and ending research with human participants”²

1 FSD Kenya. (2022, July). FSD Kenya household tracker: Finances, health, and coping in Kenya—From COVID-19 to the 2022 elections (Wave 9 infographic). FSD Kenya.

https://www.fsdkenya.org/wp-content/uploads/2021/10/FSDK_Infographic_W9-FINAL.pdf

2 Wambua, J., Singh, A., Kihindas, K., Gachungi, I., & Forscher, P.S. Manage relationships when starting and ending research with human participants. (2024). In P.S. Forscher & M. Schmidt (eds), *A better how: notes on developmental meta-research* (pp 182-193). Busara. [DOI: doi.org/10.62372/ISC16112](https://doi.org/10.62372/ISC16112)



Behavioral science in the global majority

Development programs succeed or fail based on how the intended beneficiaries engage with them. Although once controversial, this truism has been increasingly adopted as something development actors must take seriously if they are to succeed in their mandate of spurring structural economic change. As a result, behavioral science has been increasingly enshrined as strategically critical by such august bodies as the World Health Assembly (via [WHA resolution 76.7, Behavioral sciences for better health](#)³ and the [RECAPPS monitoring framework](#)⁴ that implements this resolution) and the United Nations (via its transformation program, the [UN 2.0 Quintet of Change](#)⁵). Alongside this recognition, organizations and units that conduct and apply behavioral science have proliferated, both in the form of dedicated units within organizations and as standalone organizations that operate as contractors-for-hire.⁷

3 World Health Assembly, 76 (2023). Seventy-sixth World Health Assembly: Geneva, 21-30 May 2023: resolutions and decisions, annexes. World Health Organization. <https://iris.who.int/handle/10665/376760>

4 World Health Organization (2026). Mainstreaming behavioural sciences into institutions responsible for public health: monitoring framework and indicators. World Health Organization. <https://iris.who.int/handle/10665/385608>. License: CC BY-NC-SA 3.0 IGO

5 United Nations. (n.d.). UN 2.0: A United Nations ready for the future. United Nations. <https://www.un.org/two-zero/en>

6 International Bank for Reconstruction and Development / The World Bank & World Health Organization (2024). Behavioral science around the world: volume III: public health. World Health Organization. <https://doi.org/10.2471/B09046>. License: CC BY-NC-SA 3.0 IGO

7 Wendel, S. (2020). Behavioral teams around the world. Behavioral Teams. https://www.behavioralteams.com/wp-content/uploads/2020/10/Behavioral-Teams-Around-the-World_4Oct2020.pdf

Despite this proliferation, behavioral science that is both led by and relevant to members of the global majority is relatively uncommon.^{8,9} When this research does occur, it sometimes causes harm, damaging affected communities and creating heavy costs for the affected research teams, who must act swiftly to contain the damage. As illustrated in the case study that leads this piece, this harm is unpredictable, is damaging socially and financially (the costs of addressing the mistakes in study implementation exceeded \$30,000 USD), and can even happen in research where the explicit aim is to provide a benefit. The unpredictable nature of harm in behavioral science in global majority countries illustrates the need for specialized structures and processes that can help predict and mitigate the risks of such harm – though we would not want to institute processes that are so burdensome as to make it hard to conduct the very research that would correct the aforementioned imbalances in who does and benefits from behavioral science.

This document describes a structure that we hope can prevent such unintended social harm while not imposing undue burdens on the research process. That structure is the Busara Institutional Scientific and Ethical Review Committee (Busara ISERC), an ethics review board that specializes in ethical oversight of behavioral science in the global majority. Although Busara ISERC is currently authorized to operate only in Kenya, we are actively exploring opportunities to extend its services to countries and jurisdictions where Busara has the relevant experience and expertise. Below, we describe our motivation for forming Busara ISERC, the process we followed to create it, Busara ISERC's structure and operating principles, and close with a reflection on where we hope Busara ISERC will go over the next few years.

8 Mughogho, W., Adhiambo, J., & Forscher, P.S. African researchers must be full participants in behavioural science research. *Nat Hum Behav.* 2023 Mar;7(3):297-299. doi: [10.1038/s41562-023-01536-6](https://doi.org/10.1038/s41562-023-01536-6). PMID: 36755133

9 Thériault, R., & Forscher, P.S. (2024). *The Missing Majority in Behavioral Science Dashboard*. https://remi-theriault.com/dashboards/missing_majority



Ethical review of behavioral science in the global majority

In addition to the scarcity of research that is both relevant and led by individuals in the global majority mentioned above, the infrastructure to regulate and support research is nascent. This has led to well-publicized ethical lapses in behavioral and social research in global majority countries. In one noteworthy example, a team of researchers, none of whom were Kenyan, randomized compound owners in the Nairobi slum, Kayole-Soweto to one of two conditions. In one, they were confronted face-to-face by an employee of the Nairobi Water Company about the payment balance on loans they received in return for a connection to the water and sewage system. In the other, they received a printed notice on their door saying that, unless they made their payments, the water and sewer services for the entire compound would be disconnected.¹¹ This notice led to actual disconnections lasting up to nine months. The people who suffered the worst impacts of the disconnections were not the owners of the compounds but their tenants, who had no means of consenting to an experiment that put their basic water services at risk.¹² One wonders whether such an experiment would ever be performed in California, where one of the study authors was based.

Incidents such as these raise the specter of *ethics dumping*, wherein researchers based in a location with a relatively strict regulatory regime “export” ethically risky research to a setting with a more lax regime.¹³

13 Teixeira da Silva JA. Handling Ethics Dumping and Neo-Colonial Research: From the Laboratory to the Academic Literature. *J Bioeth Inq*. 2022 Sep;19(3):433-443. doi: [10.1007/s11673-022-10191-x](https://doi.org/10.1007/s11673-022-10191-x). Epub 2022 Jun 22. PMID: 35731331; PMCID: PMC9215145

Ethics dumping is far from the only symptom of weak regulatory systems for behavioral science research in the global majority. Consider, for example, the fact that Kenya, where the above water disconnection study took place, does in fact have a robust regime for ethics review — at least on paper. Kenya requires that all research conducted in Kenya be reviewed by a Kenya-based ethics review board, and that this research additionally receive clearance by the Kenyan government agency responsible for regulating research, the National Commission for Science, Technology, and Innovation (NACOSTI). The water disconnection study, for example, received both a NACOSTI clearance and approval from a Kenyan ethics review board.¹⁴

The problem with this system lies not in its rules, but its implementation. For example, ethics review boards in Kenya can be both under-resourced and overburdened, leading to reviews that are either delayed or cursory. More than half cover multiple disciplines, not just one, increasing the risk that any given protocol receives a review outside the expertise of the designated reviewers. Just four specialize in social science, and none specialize in behavioral science.¹⁵ Due to resource constraints, ethics review boards struggle to learn from their mistakes through processes such as research or systematic monitoring of research after a protocol is approved.

14 Coville, A., Galiani, S., Gertler, P. J., & Yoshida, S. (2020). *Financing municipal water and sanitation services in Nairobi's informal settlements* (NBER Working Paper No. 27569). National Bureau of Economic Research. https://www.nber.org/system/files/working_papers/w27569/w27569.pdf

15 Institutional Scientific and Ethical Review Committee (ISERC) in Kenya. National Commission for Science, Technology, and Innovation. Accessed 9 June 2026. <https://www.nacosti.go.ke/accredited-isercs-in-kenya/>



In their efforts to review an ever-growing pile of study protocols across even unfamiliar disciplines even with constrained money, training, and staffing, some ethics review boards in the global majority unintentionally create administrative burdens for the researchers depending on them for ethical oversight. At Busara, for example, a typical protocol submitted to an external ethics review board incurs fees ranging from \$500-\$2000 USD, requires seven days of staff time to prepare and administer, and, due to the infrequent meeting schedules of some ethics review boards, can require a waiting period of up to six months or more. In one noteworthy example, one of our protocols was under review for over a year and had to be moved to a different ethics review board due to the ongoing impact of the ethics review process on our project timelines. These problems are exacerbated when the ethics review boards involved are exclusively staffed by professors whose attention is divided across research, teaching, and other service requirements.

Special problems complicate the ethical review of behavioral science research. In contrast with, say, medical research, in which assessing risk requires medical knowledge but can usually be reduced to the health impact of the specific intervention, the risks arising from behavioral science research are less predictable and often arise from how the intervention is implemented or perceived. In the cash transfer project we conducted in Nakuru from the opening story, for example, the relevant risks were social and were introduced by how members of the community perceived the cash transfer intervention. Accurately assessing these kinds of risks requires specialized knowledge about both the methods and theories of behavioral science and the culture and history of the communities that will be affected by the proposed research.

Our journey to improve the ethical oversight of our work

We didn't just start at an ethics review board. In 2021, Busara launched an internal agenda focused on identifying problems with our ethics practices, creating and testing solutions to those problems, and establishing structures to action those solutions.¹⁶ With the motto “participant voice first,” this agenda aimed to create changes that center the preferences of the intended beneficiaries of research in the global majority.

We started our work on this agenda by asking our participants what makes them feel respected or disrespected in their engagements with us. Below are some examples of the feedback we received:

“Some questions are too personal and should not be asked. For instance, for the gender-based violence research, they were asking the victims questions as if they were the DCI [Criminal Investigators] such as why did you hit your partner with this particular weapon? It is hard to answer such questions. They [participants] will only lie,”

Male, 26 Years Old, Kawangware

“There is a question I was asked that was so personal. I was asked why I lived in the slum. I didn't like it because no one wants to live in an impoverished single room or mud house. I started thinking why I was asked such a question,”

Female, 26 years old, Kibera

16 Wambua, J., Owsley, N., & Wein, T. Participant voice first: Busara's research agenda on ethical research in the Global South. Busara Groundwork No. 3 (Research Agenda). Nairobi: Busara, 2023.
DOI: doi.org/10.62372/NQPF8886



“It is important to me [that results are shared] so that I can know what went on and what will happen now. I would like to know what the results were and how it would help someone,”

Female, 28 Years Old, Kibera

These responses highlight both specific practices that Busara could improve and a more general desire from participants to be treated as a complete person, not just a source of data to extract and turn into knowledge products. Improving ethical practices therefore has to mean creating procedures that institutionalize this respect for persons.

Since we received this feedback, we have tested different methods to implement it. Not everything we have tried has worked.¹⁷ For example, although our participants sometimes complain that they do not fully understand what is expected of them once they sign a consent form, tweaking the format in which a consent form is presented does not seem to impact the degree of respectful treatment perceived by participants – at least in the relatively low-stakes setting in which we did this testing. In addition, although our participants also report a desire to express themselves in research, providing an open-ended textbox for such expression does not seem to be sufficient to increase perceptions of respectful treatment. And although our participants express a desire for feedback about the results of studies, a text message sharing such results also does not seem to increase perceptions of respect. These (and other similar practices) may make more of an impact in high-stakes projects where ethical risks are genuinely high.

17 Wambua, J. Consent, open-ended questions, and feedback loops: empirical insights into research ethics in the Global South. (2024). In P.S. Forscher & M. Schmidt (eds), *A better how: notes on developmental meta-research* (pp 182-193). Busara. DOI: doi.org/10.62372/ISCI6112

Above all, we have learned that treating our participants respectfully requires treating our relationship with participants as a relationship rather than treating participants transactionally.¹⁸ That means taking their preferences seriously and, when we discover that we have erred, taking concrete steps to address the error. A history of broken promises does not make for a trustworthy relationship and does not demonstrate respect.

Our ethics agenda was both productive and generated new knowledge about how our participants were affected by our work. By itself, however, this knowledge did not tangibly improve ethical practices within Busara. Such tangible improvements require a mechanism with Busara's institutional structure to put any knowledge from the agenda into action. Thus, in 2023, we began exploring whether we could create such a mechanism that could institutionalize these learnings.

The need to institutionalize learnings from the ethics agenda, combined with the need to manage the operational impact of the sometimes burdensome processes we experienced at other ethics review boards, was the genesis of our project to create the Busara Institutional Scientific and Ethical Review Committee (Busara ISERC). The project aimed to create a team within Busara that is both fully compliant with Kenya's legal frameworks for ethics review and that addresses the problems we identified with current ethics review processes, both within the sector and our organization. The process of laying the groundwork for this team has been long, as creating a legally compliant team required Busara to both officially register as a research institution with

18 Wambua, J., Singh, A., Kihindas, K., Gachungi, I., & Forscher, P.S. Manage relationships when starting and ending research with human participants. (2024). In P.S. Forscher & M. Schmidt (eds), *A better how: notes on developmental meta-research* (pp 182-193). Busara. DOI: doi.org/10.62372/ISCI6112



NACOSTI and, once registered, receive official NACOSTI accreditation to conduct ethics review for social and behavioral science protocols – both of which can be multi-year processes. Simultaneously, we had to draft detailed Standard Operating Procedures, develop role descriptions, and receive training and mentorship to ensure that our newly formed ethics review board complies with NACOSTI's expectations. We also had to benchmark our proposed structures and procedures against those of peer institutions to ensure they are likely to fulfill our intended mandate.

Busara ISERC is thus the culmination of a lengthy process of reflection on the problems with ethical review processes in our organization and sector, as well as potential interventions to address these problems and the ways we can institutionalize those interventions.

The structure and core competencies of the Busara Scientific and Ethics Review Committee

Like other ethics review boards based in Kenya (or, as they are known locally, Institutional Scientific and Ethical Review Committees, or ISERCs), Busara ISERC is comprised of a set of permanent staff (the **secretariat**) and a rotating group of people who serve on a temporary basis (the **committee**). The secretariat manages administrative matters and outgoing communications to external researchers, other ethics review boards, and NACOSTI in its position as a regulator. The committee conducts in-depth review of submitted protocols and has formal decision-making power to accept those protocols, ask for revisions, or reject them.

Although Busara ISERC shares the same structure as other Kenya-based ethics review boards, it differs somewhat in the typical processes implemented within this structure. Take its review processes. Like most Kenyan ethics review boards, Busara ISERC offers both **expedited review**, in which a submitted protocol is handled by a small subset of reviewers, and **full review**, in which the protocol is vetted by the entire committee. Most Kenyan ethics review boards charge higher fees for expedited review, a practice that reserves the faster review process for those researchers with the budget to pay for it. Busara ISERC instead charges a common fee for both expedited and full review, instead, basing decisions about which protocols



receive expedited review based entirely on the judged level of ethical risk. This process ensures that the protocols that are genuinely minimal risk can be approved quickly, even if the proposing researchers are operating on a low budget.

Busara ISERC also differs in how its secretariat and committee implement its processes. The initial judgment about which protocols present a minimal enough risk to qualify for expedited review is done not by a member of the committee, but by the secretariat. This is because, unlike committee members, the secretariat is comprised of permanent staff who can triage protocols according to their risk as they are submitted. The secretariat is also empowered to make recommendations about the fate of minimal-risk protocols, though final authority for these decisions rests with the committee. Combined, Busara ISERC's fee structure and unusually empowered secretariat create efficiencies for researchers, who benefit from a faster review process based on the ethical risk of the projects they propose, and for committee members, for whom more routine decisions are routed through the secretariat, reserving their time and attention for protocols that are more ethically complex.

To implement these processes, we are staffing both the secretariat and the committee to ensure that the proper contextual and substantive expertise is available at the time of review. The senior members of the secretariat are required to have enough behavioral science expertise to allow for both informed triage decisions and informed recommendations on minimal risk protocols. We have selected our committee to be diverse, with representation from both inside and outside Busara, broad representation of different social and behavioral disciplines, and membership from the communities where we work frequently (such as Kibera and Kawangware). This membership ensures that the right expertise and contextual knowledge are present during in-depth review of protocols.

Unlike many ethics review committees that face resource constraints in conducting routine post-approval monitoring, Busara ISERC intends to embed monitoring as a core function of its secretariat. Through dedicated operational support, risk-based monitoring plans, and integration with existing compliance systems, Busara ISERC will seek to ensure that ethical oversight continues beyond protocol approval and remains responsive to participant experiences throughout the study lifecycle. This approach builds on Busara's existing ethics and compliance structures, which already support the monitoring of research activities, including studies that present considerably higher levels of ethical risk. By leveraging this experience and established operational systems, Busara ISERC will be well-positioned to implement meaningful post-approval oversight and address a gap that has been widely recognized across the research ethics ecosystem in Kenya.

Finally, Busara ISERC is housed within our Business Operations Division, ensuring that the reporting lines for the secretariat do not create conflicts of interest that could compromise the validity of ethical review.

The structure described above operationalizes the following **four core competencies** that stem from our analysis of the landscape of ethics review for behavioral science in the global majority, as well as our internal ethics agenda. These core competencies should also allow Busara ISERC to address the most common challenges that face such ethical review.

Behavioral science expertise

Some level of behavioral science expertise is necessary to adequately judge the level of ethical risk presented by a protocol. This is because some level of expertise is necessary to understand the proposed methods. As shown through our experiences, a lack of behavioral science expertise can lead to



miscalibrated attention, with too much scrutiny on some protocols that are genuinely low risk and not enough scrutiny on protocols that present higher levels of risk.

Busara ISERC achieves this core competency by ensuring that both its secretariat and its committee are staffed with members who have a good understanding of behavioral science.

Community input

Just as behavioral science expertise is necessary to judge risk, so is knowledge of the communities affected by a proposed piece of research. This is especially true for behavioral and social research, wherein community norms and practices could even be the object of study.

Busara ISERC achieves this core competency by reserving some seats on its committee for members of the communities where Busara works most frequently, such as Kibera and Kawangware.

Accountability

Accountability is important in two senses. First, the ethics review process should be somewhat shielded from outside influence so as not to introduce conflicts of interest that could compromise its validity. Second, the administrative structure that conducts ethics review should contain mechanisms for feedback about how that process is working, should monitor those mechanisms, and continuously improve any processes that are not working well. Any issues should be transparently communicated to the relevant stakeholders, and broader learnings should also be shared publicly. Busara ISERC achieves this core competency via both its structure and processes. Structurally, Busara ISERC is housed within Busara's Business

Operations division rather than a division responsible for research. Such a structure mitigates the risk that key members of Busara ISERC report to the same people delivering research for clients, a structure that would create conflicts of interest. In terms of process, Busara ISERC is developing key performance indicators that would be reported internally and externally on a regular basis, a structure that creates accountability to both the researchers who use Busara ISERC and participants who might be affected by the research that Busara ISERC reviews. Busara ISERC will also create and monitor dedicated channels for feedback. Finally, monitoring will be a core function of Busara ISERC's secretariat, allowing Busara ISERC to generate and share knowledge about what works to promote the ethical conduct of behavioral science research.

Efficiency

The process of ethics review should not be so burdensome as to obstruct or delay research that could provide a public benefit, especially research that is genuinely minimal risk. Gains in efficiency free up resources to mitigate ethical risks in research where those risks are genuinely high.

Busara ISERC achieves this core competency through streamlined and user-friendly processes and through its system of expedited review, wherein protocols with minimal ethical risks are handled by a smaller set of Busara ISERC reviewers.



The future of Busara ISERC

Busara ISERC has resulted from a lengthy process of reflection, both on our own experiences and on the experiences in global development writ large. We have designed its structure, processes, and core competencies to respond to the concrete challenges identified through this process of reflection, and therefore believe that Busara ISERC can be a part of addressing those challenges.

Although Busara ISERC is currently authorized to operate only in Kenya, we are actively exploring opportunities to extend our services to other countries where Busara operates. This includes exploring partnerships and Memoranda of Understanding (MOUs) with ethics review committees in countries where Busara maintains offices or a significant project presence. Through these partnerships, Busara ISERC reviews could complement local ethics review processes, enabling local review bodies to leverage the advantages of Busara ISERC's structure and processes and potentially reducing the total time to process and review protocols while maintaining compliance with national regulatory requirements.

We hope that Busara ISERC will serve as a key building block for the infrastructure that supports high-quality ethical behavioral science in the global majority and will therefore function as part of the invisible machinery that allows for the production of insights and knowledge for the public benefit.

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About Busara

Busara is a research and advisory organization, working with researchers and organizations to advance and apply behavioral science in pursuit of poverty alleviation. Busara pursues a future where global human development activities respond to people's lived experience; value knowledge generated in the context it is applied; and promote culturally appropriate and inclusive practices. To accomplish this, we practice and promote behavioral science in ways that center and value the perspectives of respondents; expand the practice of research where it is applied; and build networks, processes, and tools that increase the competence of practitioners and researchers.

About Busara Groundwork

Busara Groundwork lays the groundwork for future research and program design. As think pieces, they examine the current state of knowledge and what is needed to advance it, frame important issues with a behavioral perspective, or put forward background information on a specific context.

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