

STANDARD OPERATING PROCEDURE
PERMISSION FOR CONDUCTING RESEARCH INVOLVING UNISA
EMPLOYEES, STUDENTS AND DATA

IMPLEMENTATION DATE: 02 June 2016

The Research Permission Subcommittee (RPSC) meets monthly to consider applications for permission to conduct research involving Unisa employees, students and data. The meeting schedule and the deadline for submissions are published on the website of the Research Department.

Please contact the secretary of the Research Permission Subcommittee for any technical queries about application forms, submissions and matters related to the outcome of research permission applications.

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1. INTRODUCTION

1.1 Objectives of the Standard Operating Procedure

- 1.1.1 Provide a minimum institutional benchmark of legal and ethics norms and standards for *UNISA and Non-UNISA researchers* to obtain permission to conduct research involving UNISA employees, students and data.
- 1.1.2 Provide a detailed explanation of the process of obtaining permission to conduct research involving UNISA employees, students and data.
- 1.1.3 Provide guidance to relevant *individuals* on how they might meet the expected norms and standards, including UNISA researchers, Non-UNISA researchers, postgraduate degree supervisors, college representatives and institutional gatekeepers.
- 1.1.4 Provide guidance to relevant *committee structures* engaged in the process on how they might meet these standards, including the Senate Research, Innovation, Postgraduate Degrees and Commercialisation Committee (SRIPCC), the Research Permission Subcommittee (RPSC), UNISA Research Ethics Review Committee (URERC), College or Departmental Research Ethics Review Committees (CERCs) and College Research and Innovation Committees (CRICs).
- 1.1.5 The standard operating procedure (SOP) should be read in conjunction with the [Policy for Conducting Research Involving UNISA Employees, Students and Data](#).

1.2 Background

The Research Permission Subcommittee (RPSC) reviews applications to conduct research involving UNISA employees, students and data. The Research Permission Subcommittee (RPSC) is a subcommittee of the Senate Research, Innovation, Postgraduate Degrees and Commercialisation Committee (SRIPCC) of the University of South Africa.

The RPSC seeks to protect the dignity and privacy of UNISA employees and students by ensuring that access to data from them, and about them, meets minimum legal and ethics standards. It also seeks to protect the University from any risks that may arise as a result of access to UNISA employees, students and data. While trying to protect UNISA employees and students and their data, whether primary or secondary, it also seeks to balance this with the need to promote responsible, ethics research and promote regulated and legal access to data and respect for human participants in research.

In order to achieve these crucial objectives, its operations are guided by the following legislation:

- (a) Protection of Personal Information (POPI) Act, no 4 of 2013
- (b) Promotion of Access to Information (PAIA) Act, no 2 of 2000.

The Policy for Conducting Research Involving UNISA Employees, Students and Data provides institutional direction.

Applications will only serve at the RPSC once it obtained ethics approval and clearance through the College or School's structure(s) that are responsible for research ethics oversight. The Chair of the Ethics Review Committee or the Head:

Graduate Studies and Research will submit successful applications that meet quality assurance standards complying with the requirements for obtaining research permission to the RPSC. Ethics approval does not automatically imply permission to conduct the research using UNISA employees, students and data.

1.3 Scope

1.3.1 The procedures set out in this SOP apply to researchers *who seek permission to conduct research* which involves UNISA employees, students and data¹ *for the purpose of generating research output for publication in the public domain.*²

The following categories of researchers are included under the procedures set out in this document:³

- a) Non-UNISA researchers (including visiting researchers)
- b) Non-UNISA students (including UNISA employees registered for qualifications at other higher education institutions)
- c) UNISA researchers (including employees, academic associates, postdoctoral fellows)
- d) UNISA students (including UNISA employees registered for qualifications at UNISA)

1.3.2 All research involving UNISA employees, students and data of the University of South Africa must be submitted for consideration by the RPSC, irrespective of the level of ethics risk involved, with the exception of the following two categories:

- Duly authorised routine data gathering activities which are necessary for efficient administration and operation at UNISA. This exemption does however not apply to usage of institutional data for academic publication purposes.⁴
- Authorised data gathering activities that is conducted on the premises of UNISA that does not relate to the core business of UNISA (for instance research conducted at UNISA on the influence of the child-parent relationship on career choices), with the exception of research of this nature in which access is required to the personal information of UNISA employee and/or students.

1.3.3 Retrospective permission will not be granted for the use of primary research data.

¹ Policy for Conducting Research involving UNISA Employees, Students or Data, (“Policy”) par 5.1

² Policy, par 5.5

³ Policy, par 5.2

⁴ Policy, par 5.7.1, 5.7.2 & 5.7.3

1.4 Terminology

Data	are facts, observations or experiences on which an argument, theory or test is based and include any information, records, files or other evidence, irrespective of their content or form (e.g. in print, digital, physical or other forms), that comprise research observations, findings or outcomes, including primary materials and secondary data. Data may be numerical, descriptive or visual. Data may be raw or analysed, experimental or observational ⁵ ;
College structure or representative	is the structure or representative that is responsible for overseeing permissions to conduct research involving UNISA employees, students and data, namely the College Research and Innovation Committee or an alternative committee established to oversee research ethics or a relevant representative such as the Head: Graduate Studies and Research or the chairperson of the College Ethics Review Committee;
Gatekeeper	is a person recognised as a channel of access to a research site, participants or information owing to his/her position or delegated authority;
Personal information ⁶	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: <ul style="list-style-type: none">a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;b) information relating to the education or the medical, financial, criminal or employment history of the person;c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;d) the biometric information of the person;e) the personal opinions, views or preferences of the person;f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

⁵ Definition adapted from: University of Melbourne Management of Research Data and Records <http://research.unimelb.edu.au/integrity/conduct/data/review> cited in the Australian National Data Service Guide. (2011). web@ants.org.au. (Accessed on 31 March 2015).

Monash University Research Data Policy <http://policy.monash.edu.au/policy-bank/academic/research/research-data-managementpolicy.html> cited in the Australian National Data Service Guide. (2011). web@ants.org.au. (Accessed on 31 March 2015).

⁶ As defined in the Protection of Personal Information Act no 4 of 2013
Approved – Council - 11.11.2016

- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

Principal or main researcher

refers to the person leading the research project. The principal researcher could be a non-UNISA or UNISA researcher or student. The principal researcher is responsible to ensure that the research is complying with the requirements for obtaining research permission set forth in the University of South Africa's Policy for Conducting Research Involving UNISA Employees, Students and Data;

Record⁷

of, or in relation to, a publicbody means any recorded information-

- a) regardless of form or medium;
- b) in the possession or under the control of that public ...body, ...; and
- c) whether or not it was created by the public ...body...

A request for access to information must be done in terms of the Promotion of Access to Information Act;

Research

means a systematic investigation aimed at the development, or contribution to knowledge through acceptable means of scientific dissemination.

2. APPLICATION REQUIREMENTS FOR THE RESEARCH PERMISSION SUBCOMMITTEE

There are two origins of applications that the RPSC deals with, namely:

- Internal applications

Internal applications are research permission applications submitted by UNISA researchers and students.

- External applications

External applications are submitted by Non-UNISA researchers and students. UNISA employees who are registered for qualifications at other universities and wishing to involve UNISA employees, students and data, are regarded as external applicants or Non-UNISA researchers.

The application processes for application by the different categories of applicants differ with reference to the channel of submission (refer to section 6 – Flow chart of the research permission application process).

⁷ As defined in PAIA, 2000

2.1 UNISA researchers and students (internal applications)

2.1.1 Ethics approval

- a) Before submitting an application for permission to conduct research using UNISA employees, students and data, ethics approval must be obtained.⁸
- b) UNISA researchers and students need to obtain ethics clearance from their College Research Ethics Review Committee as per the UNISA Policy on Research Ethics⁹ and the Standard Operating Procedure for Research Ethics Risk Assessment. High risk applications should be cleared by the ethics review committee with the highest authority; typically the College Ethics Review Committee. Low and negligible risk applications can be expedited. Medium risk applications should be considered by a full committee.
- c) Applications for permission to conduct research using UNISA employees, students and data will not be considered by the RPSC without the necessary ethics clearance certificates.¹⁰
- d) An ethics clearance certificate is valid for the time period specified on the ethics certificate.
- e) Ethics approval does not automatically imply permission to conduct the research using UNISA employees, students and data.¹¹
- f) All internal applications are submitted to the relevant College structure (CRERC) or representative for consideration and escalated to the RPSC by the authorised representative.

2.1.2 Documents required

An application for permission to conduct research involving UNISA employees, students and data should be submitted by a competent principal researcher, or a student in training supported by a qualified supervisor responsible for the ethics and scientific conduct of the research and should include:

- a) A fully completed Application Form, dated and signed by the researcher, supervisor (if applicable) and the relevant College representative (if applicable) (available from RPSC@unisa.ac.za).
- b) An approved research proposal/plan (clearly identified and dated, with an indication of who approved it), together with supporting documents such as the information leaflet, consent form, cover letter to surveys and data collection instruments).
- c) The Application Form should include:
 - i) The research topic or title as indicated on the ethics clearance certificate
 - ii) The research aim and objectives

⁸ Policy, par 7.1.1

⁹ Policy, par 7.1.1.2

¹⁰ Policy, par 5.1.2

¹¹ Policy, par 6.1.11

- iii) A clear indication of the:
 - type of data source(s) that access is needed for [e.g. employee/student records, UNISA information such as strategic documents, email addresses] and
 - data collection activity that permission is needed for [e.g. permission to conduct interviews with employee and/or students or to distribute a web-based survey]. An overview of the process that will be used to recruit potential participants, when applicable (i.e. how, where and by whom will prospective participants be approached?)
- iv) A synopsis of the potential risks relevant to the research with reference to potential harms related to human participant involvement, institutional involvement, data security and storage, reputational and/or other possible risks)
- v) A synopsis of measures that will be employed to mitigate any potential risks mentioned in paragraph (iv).
- vi) A description of the security procedures relevant to the protection of participant privacy and data storage.
- vii) An indication of the envisioned research outcome(s).
- d) An abridged curriculum vitae relevant to the proposed research of any of the researchers conducting the research, including the supervisor in case of student applications.
- e) A valid research ethics clearance certificate, signed and dated.
- f) Attach the Request for Access to a Record of the University of South Africa Form (where relevant in terms of the Promotion of Access to Information Act 2 of 2000) [Form H]. This form should also be completed if you need access to employee or student e-mail addresses. UNISA employees are not required to pay a fee for access to UNISA records.
- g) A statement of agreement to execute the research in an ethically responsible way, thus ensuring participants' privacy and the confidentiality of records, not to use the research and information in a manner that is detrimental to the University of South Africa or to persons or institutions outside the university unless it can be scientifically justified,
 - to notify the Chairperson of the University of South Africa's Research Permission Subcommittee of significant changes in research activities or
 - timelines that may make the information in this form inaccurate and
 - to submit an electronic copy of the final report or dissertation based on the information gained through the research activities described in the application to the Executive Director: Research Administration (Chairperson of the University of South Africa's Research Permission Subcommittee) within 12 months from completion of the project.

- h) A confirmation that the principal researcher is familiar with relevant policies and legal requirements.

2.1.3 Submission and processing of applications

- a) Applications are submitted electronically to the RPSC secretary (rpsc@unisa.ac.za) by the dedicated College Representative (Head: Graduate Studies and Research or the Chairperson of the Research and Ethics Review Committee) before or on the closing date of the agenda. This is done in order to ensure oversight and monitoring by the College representative.
- b) The meeting dates of the RPSC are published on the website of the Research Administration Department.
- c) Student applications need to be submitted to the College representative by supervisors, who need to co-sign and validate the application and declare that the application meets the required standards.
- d) Receipt of the application will be acknowledged by the Secretariat of the RPSC within two working days.
- e) Researchers will be notified in writing about the outcome after the RPSC has considered the application, usually within 7 working days after the regular meeting of the RPSC.
- f) The procedure and requirements for any amendments required to the application will be made available in writing to the applicant(s). Any amendments should be submitted to the RPSC as soon as possible, but normally within 30 calendar days, as to not unduly delay the research process. The amended application will usually be tabled for consideration at the next available meeting of the RPSC.
- g) Incomplete applications will not be accepted for consideration by the RPSC.

2.1.4 Access to personal information

The RPSC, in the promotion of protection of personal information, does not encourage access to the individual's special personal information. Instead, the committee encourages the researcher to incorporate this type of data in the questionnaire and let the participating respondents give it voluntarily. See summarised version of [Protection of Personal Information Act](#)

2.2 Non-UNISA researchers and students (external applications)

An external application for permission to conduct research involving UNISA employees, students and data should be submitted by a competent principal researcher, or a student in training supported by a qualified supervisor responsible for the ethics and scientific conduct of the research and should include:

2.2.1 Ethics approval

- a) Before submitting an application for permission to conduct research using UNISA employee, students and/or data, ethics approval must be obtained.

- b) A gatekeeper certificate is not enough and does not serve as a research ethics certificate.
- c) Non-UNISA researchers and students (including UNISA employee registered for qualifications at other Universities) need to obtain ethics clearance from both the institution they are registered with as well as from the UNISA Research Ethics Review Committee.¹²
- d) Applications for permission to conduct research using UNISA employee, students and data will not be considered by the RPSC without the necessary ethics clearance certificates.¹³
- e) An ethics clearance certificate is valid for the time period specified on the ethics certificate.
- f) Ethics approval does not automatically imply permission to conduct the research using UNISA employee, students and/or data.¹⁴

2.2.2 Documents required

- a) After obtaining the relevant research ethics approval the applicant may proceed to apply to the RPSC for permission to use UNISA employee, students and data for the research project.
- b) An application should adhere to the requirements stipulated in section 2.1.2. It is important to note that the external application should be accompanied by two valid research ethics clearance certificates, one from the University or Institution of higher learning where the applicant is a registered student, and the other one from the URERC.
- c) Any application is viewed as incomplete without an accompanying research ethics clearance certificates.
- d) No application will be reviewed by the RPSC if it does not adhere to this requirement.

2.2.3 Submission and processing of applications

- a) Applications are submitted electronically to the RPSC secretary (rpsc@unisa.ac.za) by the Non-UNISA researcher.
- b) Non-UNISA student applications are submitted by the student or supervisor who needs to co-sign and validate the application and declare that the application meets the required standards.
- c) The meeting dates of the RPSC are published on the website of the Research Administration Department.
- d) Receipt of the application will be acknowledged by the Secretariat of the RPSC within two working days.
- e) Researchers will be notified in writing about the outcome after the RPSC has considered the application, usually within 7 working days after the regular meeting of the RPSC.

¹² Policy, par 5.1.1(a)

¹³ Policy, par 5.1.2

¹⁴ Policy, par 5.1.3

- f) The procedure and requirements for any amendments required to the application will be made available in writing to the applicant(s).
- g) Any amendments should be submitted to the RPSC as soon as possible, but normally within 30 calendar days, as to not unduly delay the research process.
- h) The amended application will be tabled for consideration at the next available meeting of the RPSC.

2.3 Requests for amendments to previously approved application

- a) Any amendments to previously approved applications such as an extension of the data collection period, changes pertaining to the data collection procedures or instruments or changes of the sampling frame should be submitted for consideration by the RPSC in accordance with the due dates for agenda submissions.
- b) The request for amendments should include:
 - i) A memorandum clearly setting out the nature of the extension and the reason for the request (what & why).
 - ii) Relevant permission certificate.
 - iii) Relevant research ethics clearance certificate pertaining to the research.
 - iv) In case of methodological changes such as amendments to interview schedules or surveys, the request should be accompanied by both the currently approved and amended data collection instruments (and other).
- c) The amended application will be tabled for consideration at the next scheduled meeting of the RPSC.
- d) Receipt of the application will be acknowledged by the Secretariat of the RPSC within two working days.
- e) Researchers will be notified in writing about the outcome after the RPSC has considered the application, usually within 7 working days after the regular meeting of the RPSC.

3. RESPONSIBILITIES OF THE RESEARCHER

3.1 It is the responsibility of the researcher to adhere to the:

- UNISA Policy on Research Ethics,
- the UNISA Intellectual Property Policy and
- University of South Africa's Policy for Conducting Research involving UNISA Employee, Students and Data as well as
- relevant legislative frameworks in order to protect the interests of UNISA and the rights of UNISA employee and students.

- 3.2 UNISA has a right to know what will become of information obtained from UNISA employees, students and data, its intended use and application.
- 3.3 UNISA is responsible to control information obtained from its employees and/or students as prescribed by existing national laws and university policies.
- 3.4 All employee, student and UNISA data, whether identifiable or de-identified, must always be treated with the highest degree of confidentiality and responsibility.
- 3.5 The applicant needs to state how the information will be secured, who will have access to it, for how long will it be stored and eventually how it will be disposed.
- 3.6 The researcher is expected to give a copy of the completed research report to the Executive Director of Research Administration, within 12 months from the completion of the research project.

4. RESPONSIBILITIES OF THE GATEKEEPER

Different gatekeepers could be involved in gaining access to employees, students or data, including, but not limited to the Deputy Registrar, Executive Director: Research Administration, ICT employees, a representative from the Human Resources Department and authorised employees from the Directorate: Information Analysis.

- 4.1 The gatekeeper is responsible for:
 - 4.1.1 representing and protecting the interests of the university
 - 4.1.2 facilitating/controlling the access to the information to the researcher as permitted by the RPSC
 - 4.1.3 ensuring adherence to the policies of the university.
- 4.2 The gatekeeper may need to send information letters or e-mails on behalf of the researcher in order to protect the privacy of the participants.
- 4.3 The gatekeeper may assist with the randomization of participants as requested by the researcher.

5. RESEARCH PERMISSION SUBCOMMITTEE

5.1 Terms of reference

- 5.1.1 The Research Permission Sub-Committee is a committee of the Senate Research, Innovation, Postgraduate Degrees and Commercialisation Committee (SRIPCC).
- 5.1.2 The Senate Research, Innovation, Postgraduate Degrees and Commercialisation Committee assigns to this sub-committee its duty to grant permission to conduct research involving UNISA employees, students or data as required by the Policy for Conducting Research involving UNISA Employees, Students or Data.

5.2 Functions of committee

The Research Permission Sub-Committee:

- a) maintains norms and standards for obtaining institutional permission, including gatekeeper permission (permission “in principle” during the planning stage of

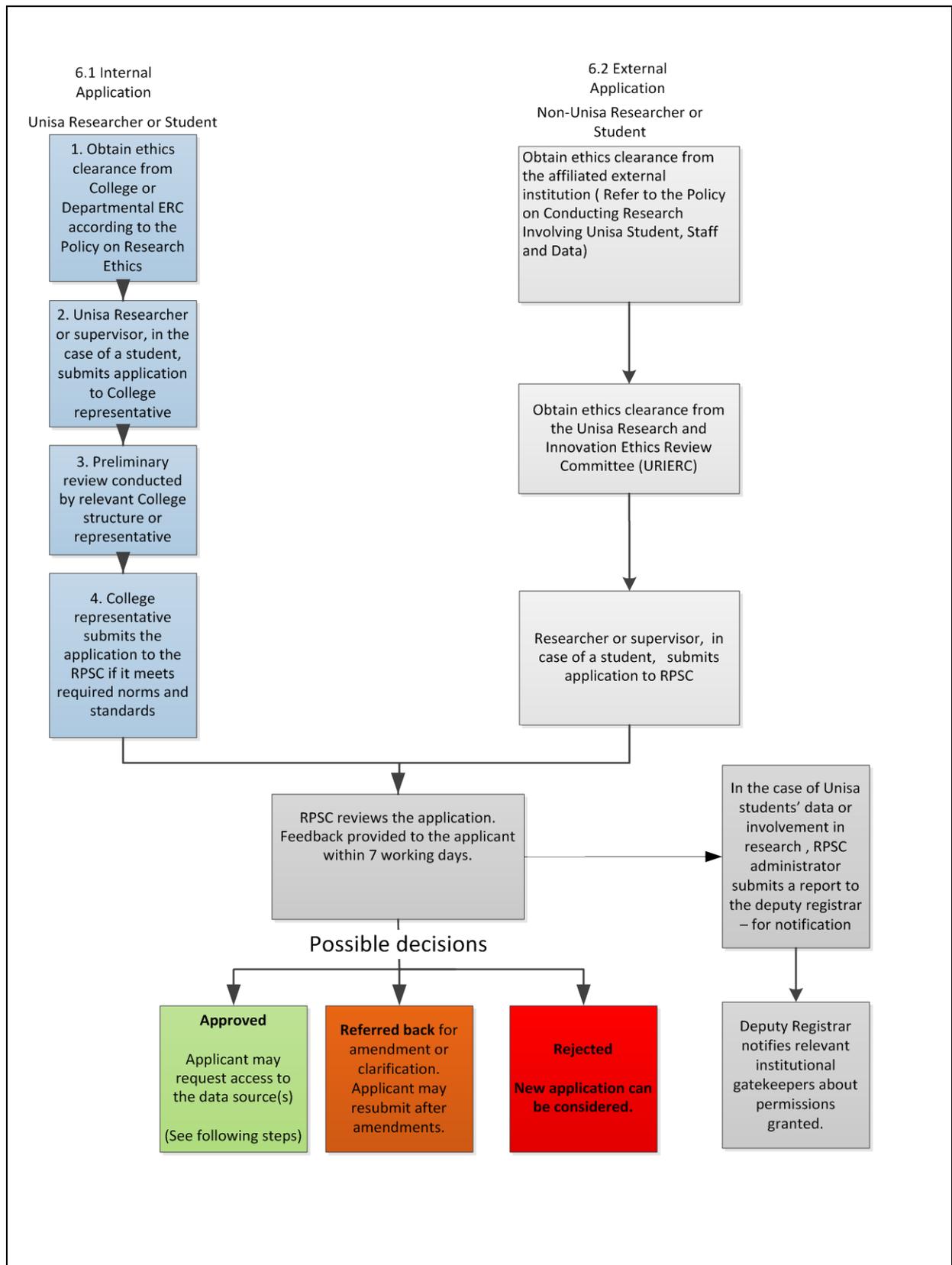
research), in line with institutional and relevant legislative frameworks [e.g. Protection of Personal Information Act, No. 4 of 2013 stipulating the importance of 'protection against unlawful collection, retention, dissemination and use of personal information' (Preamble to Act)];

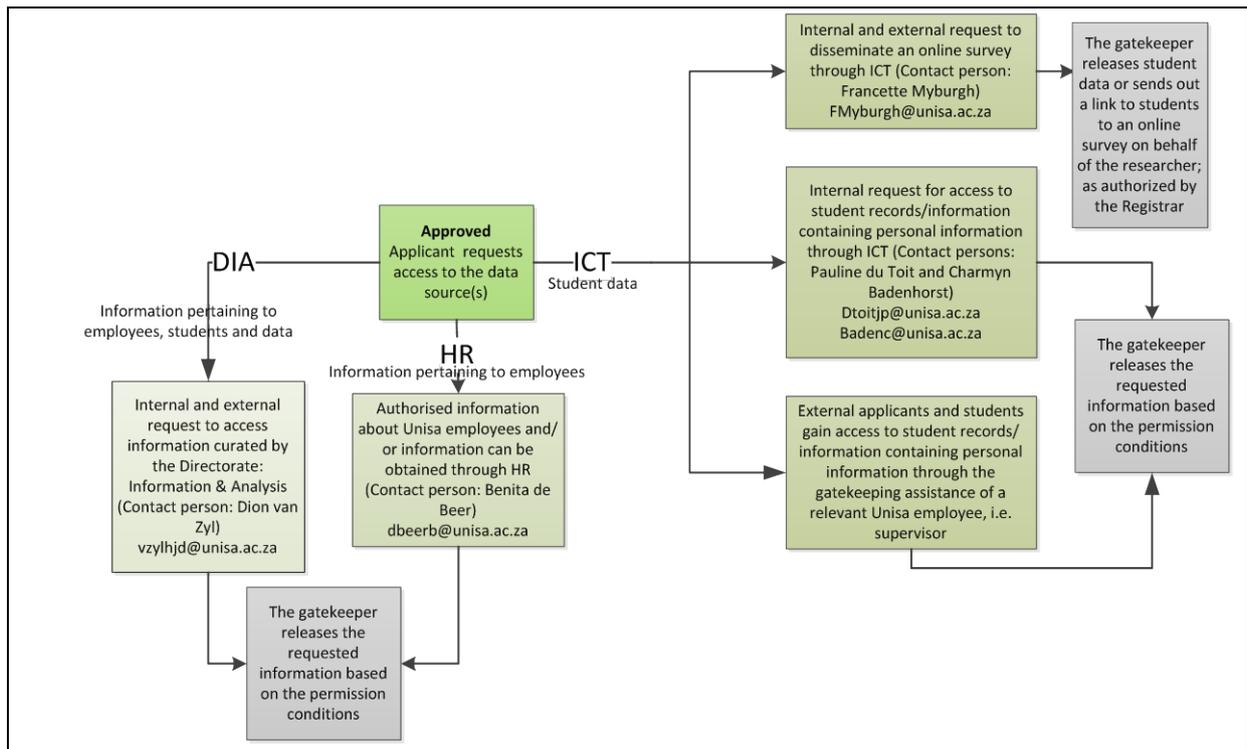
- b) has the authority to provide permission based on sound deliberation and practices;
- c) reviews applications for permission to ensure the protection of the rights of UNISA employees, students and safeguard the interests of the university;
- d) keeps a register of permissions granted for research involving UNISA employees, students or data for reporting to the SRIPCC;
- e) regularly recommends amendments to the Policy for Conducting Research involving UNISA Employees, Students or Data;
- f) advises the Vice Principal: Research, Postgraduate Studies, Innovation and Commercialisation on matters of governance relating to institutional permission to conduct research involving UNISA employees, students or data; and
- g) sets standards to ensure that researchers adhere to the reporting obligations stipulated in the Policy for Conducting Research involving UNISA Employees, Students or Data.

5.3 Appeals

An applicant who does not agree with a decision taken by the RPSC may appeal to the Senate Research, Innovation, Postgraduate Degrees and Commercialisation Committee. Internal appeals are escalated to the SRIPCC through the College. External appeals are escalated by the chairperson of the RPSC to the SRIPCC.

6. FLOW CHART OF THE RESEARCH PERMISSION APPLICATION PROCESS





7. APPLICATION FORM

The application form consists of 9 sections.

All sections relevant to the research should be completed. Incomplete application forms will be returned to the principal applicant and will not be considered by the RPSC. Applications that are not done on the most recent approved application form will not be processed by the RPSC.

Section 1, 2 & 3: The details of applicants

Section 4: The nature of permission request and the research project timeline

Section 5: Details about the research

Section 6: Declaration

Section 7: Application checklist

Section 8: Submission procedure

Section 9: Form H - Request for access to Personal Information of UNISA Employees, Students and Data (required in compliance with the Promotion of Access to Information Act, no 2 of 2000, including access to Personal Information).

