

**POLICY FOR CONDUCTING RESEARCH INVOLVING UNISA
 EMPLOYEES, STUDENTS, ALUMNI, DATA AND
 NON-HUMAN HARVESTING OF DATA**

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1. INTRODUCTION

- 1.1. This policy is based on the vision of the University of South Africa (UNISA): *The African university shaping futures in the service of humanity.*
- 1.2. It aims to advance the mission of the University, the relevant parts of which promise:
 - 1.2.1. Lifelong higher education for all and knowledge creation that is nationally responsive and globally relevant;
 - 1.2.2. A leading student-centred ODeL comprehensive university producing quality graduates which, in response to the diverse needs of society:
 - 1.2.2.1. undertakes research and knowledge production development guided by integrity, quality and rigour;
 - 1.2.2.2. cultivates and promotes an institutional ethos, intellectual culture and educational experience that is conducive to critical discourse, intellectual curiosity, tolerance and a diversity of views.
- 1.3. It is essential that research involving UNISA employees, students and data be conducted in accordance with national constitutional provisions, policies and legislative frameworks that guide research, ethical and sustainability considerations and protection of human participants.
- 1.4. This policy should be read in conjunction with other relevant UNISA policies including the UNISA Ethical Policy Framework and the UNISA Code of Ethics and Conduct.

2. DEFINITIONS AND ABBREVIATIONS

- 2.1. In this document, the following terms are defined as follows, unless clearly indicates otherwise:

Action learning	focuses on real, work-oriented issues and team learning; it aims to improve a student's competencies both in content knowledge and process skills by means of using various tools and techniques among other things for problem-solving, communication, decision-making, conflict management and leadership skills without the aim to publish the results through acceptable means of scientific dissemination;
College structure or representative	is the structure or representative that is responsible for overseeing permissions to conduct research involving UNISA employees, students and data at any of UNISA's research entities, such as the College Research and Innovation Committee (CRIC) or a dedicated representative such as the Head: Graduate Studies and Research or the chairperson of the College Research Ethics Review Committee (CREC);
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,

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	including primary materials and secondary data. Data may be numerical, descriptive or visual. Data may be raw or analysed, experimental or observational ¹ ;
Employee (academic)	is any person permanently appointed to teach or to do research at UNISA and any other employee designated as such by the Council;
Employee (professional)	refers to a person: <ul style="list-style-type: none"> a) in which the primary function is to provide of academic, institutional or student support services and b) which requires an educational qualification equivalent to at least four years of higher education study. (The minimum qualification level must be approved by the Management Committee and must be stated in the job descriptions of such employees);
Gatekeepers	are persons or structures (i.e. the Research Permission Committee) who by the right of their position of authority are recognised as a channel of access to a research site and/or participants;
Health research ²	includes any research that contributes to knowledge of: <ul style="list-style-type: none"> • biological, clinical, psychological, or social processes in human beings • improved methods for the provision of health services • human pathology • the causes of disease • the effects of the environment on the human body • the development of new application of pharmaceuticals, medicines and related substances, and • the development or new applications of health technology
Non-UNISA researcher	is a researcher that is not affiliated with UNISA, and wishes to conduct research involving UNISA employees, students or data, including visiting researchers;

¹ 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).

² as defined in the National Health Act 61 of 2003

Non-UNISA student

refers to:

- a student that is not registered for a postgraduate qualification at UNISA, and wishes to conduct research involving UNISA employees, students or data;
- an UNISA employee who is registered for a qualification at another higher education institution and wishes to conduct research involving UNISA employees, students or data;

Personal information³

means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- 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;
- 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 researcher

is 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

³ As defined in the Protection of Personal Information Act No. 4 of 2013

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;

Record⁴ of, or in relation to, a public body 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, 2000 and the Protection of Personal Information Act, 2013;

UNISA researcher refers to permanently appointed UNISA employees and current academic associates and refers collectively to developing researchers, emerging researchers and proven researchers;

UNISA student means any person registered for a UNISA qualification or short learning programme, including UNISA employees registered for a qualification at UNISA.

2.2 Abbreviations

CRERC means the College Research Ethics Review Committee;

RPC means the Research Permission Committee.

3. AIM

The primary aim of this policy is to maintain integrity in research by providing minimum ethical and regulatory requirements for conducting research involving UNISA employees, students, alumni, data and non-human harvesting of data. It aims to encourage high quality research that supports the sustainability of the core business of the university, without unduly overburdening management, employees and students, or unduly disrupting institutional operations.

4. PURPOSE OF POLICY

4.1 The policy seeks to enable prospective UNISA and non-UNISA researchers and students to avoid infringing on accepted ethical research practices, to act with scholarly integrity, social responsibility and to preserve information security and privacy.

4.2 Adherence to the established procedures is meant to protect UNISA employees, alumni and students from all forms of research-related harm, whilst safeguarding the interests of

⁴ As defined in Promotion of Access to Information Act. No. 2 of 2000 (PAIA) and Protection of Personal Information Act No. 4 of 2013

UNISA. This is particularly important where the information that has to be gathered has the potential to invade the privacy and dignity of prospective participants and third parties.

5. OBJECTIVES OF PERMISSION TO CONDUCT RESEARCH INVOLVING UNISA EMPLOYEES, STUDENTS OR DATA

The objectives of permission to conduct research involving UNISA employees, students, alumni, data and non-human harvesting of data are listed below:

- 5.1 To support the broad UNISA research and innovation agenda and policies based on the UNISA Strategy 2030 and the priorities set out in the National Plan for Higher Education and the White Paper for Post-School Education and Training;
- 5.2 To enhance the university's standing as a research and innovation institution of international repute;
- 5.3 To encourage ethical and responsible research that promotes the university's standing as a leading ODeL research institution;
- 5.4 To encourage ethical and responsible research that promotes teaching and learning, ODeL and community engagement activities at the university;
- 5.5 To promote good governance by fostering an environment that encourages integrity through research, education, clear policies and standard operating procedures.

6. SCOPE

- 6.1 This policy stipulations apply to all researchers who seek permission to conduct research for publication purposes, which involves UNISA employees, students, alumni, data and non-human harvesting of data before commencing any research activity.
- 6.2 The following categories of researchers are included under the protocols set out in this policy:
 - 6.2.1 Non-UNISA researchers (including visiting researchers and alumni)
 - 6.2.2 Non-UNISA students (including UNISA employees registered for qualifications at other higher education institutions)
 - 6.2.3 UNISA researchers (including employees, academic associates and postdoctoral fellows) (Comment: Refer to par 1.3.2(c) of the SOP)
 - 6.2.4 UNISA students (including UNISA employees registered for qualifications at UNISA)
- 6.3 In addition, it applies to other parties involved in the permission procedure, such as employees (including research supervisors), College representatives or structures such as College Research and Innovation Committees (CRICs), Professional Research Group (PRG) and institutional gatekeepers.
- 6.4 The following categories of data collection activities are included under the protocols set out in this policy:
 - 6.4.1 Research involving the collection of primary data from UNISA employees, alumni and students in person, through an electronic medium, observation and/or in the form of archival data;

- 6.4.2 Research involving the collection of secondary data about UNISA's employees, alumni, students and operations, or records pertaining to the aforementioned, through authorised institutional gatekeepers.
- 6.4.3 Research involving non-human or cognitive science approaches, the use of algorithms or the use of predictive materials in terms of information and communication technology systems.
- 6.5 The policy serves as a common repository of generally accepted practice for researchers for the purpose of generating research output for publication in the public domain.
- 6.6 Retrospective permission to conduct research involving UNISA employees, students, alumni, data and non-human harvesting of data will not be granted implying that a researcher must obtain research permission prior to commencing fieldwork activities involving Unisa employees, students, alumni, data and non-human harvesting of data.
- 6.7 Exemptions
 - 6.7.1 This policy does not apply to duly authorised routine data gathering activities which are necessary for efficient administration and operation at UNISA. The laid down procedures as per the relevant policy will apply.
 - 6.7.2 This policy does not apply to duly authorised data gathering activities by external entities which are necessary for the efficient administration and operation of the university and/or the higher education sector.
 - 6.7.3 This policy does not apply to negligible and low risk action learning assignments intended to expose students to some operational matter in need of attention rather than for scientific publication purposes. However, the principles within relevant policies should still be adhered to.
 - 6.7.4 However, the aforementioned exemptions do not apply to the usage of institutional data for scientific publication purposes.

7. PRINCIPLES FOR PERMISSION TO CONDUCT RESEARCH INVOLVING UNISA EMPLOYEES, STUDENTS, ALUMNI, DATA AND NON-HUMAN HARVESTING OF DATA

- 7.1 Permission to conduct research involving UNISA employees, students, alumni, data and non-human harvesting of data is based on the following principles:
 - 7.1.1 The value and benefits of research are dependent on the integrity of research. The internationally accepted principles of the Singapore Statement on Research Integrity⁵ are fundamental in governing research conducted at UNISA:

⁵ Singapore Statement on Research Integrity. (2010). [<http://www.singaporestatement.org/>]

- a) Honesty in all aspects of research;
 - b) Accountability in the conduct of research;
 - c) Professional courtesy and fairness in working with others;
 - d) Good stewardship on behalf of others.
- 7.1.2 Research governance is multidimensional, and researchers should adhere to all national and international laws and regulations applicable to a specific field of study or relevant to a specific research project.
- 7.1.3 Research conducted by researchers must be scientifically sound and comply with acceptable scientific practices.
- 7.1.4 Research conducted by researchers must be ethical and comply with the UNISA Policy on Research Ethics, as well as other relevant university policies to protect the interests of UNISA and the rights of UNISA employees and students.
- 7.1.5 Researchers, and those involved in research permission governance, should recognise that they have an ethical obligation to weigh societal and environmental benefits against the risks inherent to the proposed research.
- 7.1.6 In line with the principle of justice⁶, UNISA employees, alumni and students should not be systematically selected to participate in research simply because of their ease of availability. The reasons why they have been selected should be directly related to the research problem and should be scientifically justified in applications for research permission.
- 7.1.7 Collaboration is essential to the effective conduct of research, to facilitate recruitment of participants, to enable researchers to fulfil their ethical duties and to coordinate logistical and operational aspects of research.
- 7.1.8 Gatekeepers are often required to provide assistance to researchers to gain access to potential participants or data.
- 7.1.9 Personal information made available to a researcher or a gatekeeper should only be used for the advancement of the specified research project and for the purpose as described in the application.
- 7.1.10 Requests for access to personal information about UNISA employees, alumni and students should be scientifically justified and linked to the achievement of the objectives of the proposed research.
- 7.1.11 Involvement of prospective participants in the proposed research is voluntary and they have a right to decline participation.
- 7.1.12 Participants' rights to privacy, anonymity, confidentiality and respect for dignity ought to guide all decisions pertaining to research undertaken at UNISA.
- 7.1.13 UNISA's rights to privacy, anonymity, confidentiality and respect for dignity must be acknowledged by all researchers that undertake research at UNISA.

⁵ Belmont Report. (1978). [<http://www.hhs.gov/ohrp/humansubjects/guidance/belmont.htm>]

7.1.14 Ethics approval granted by a Research Ethics Review Committee is valid only

if it adheres to the Policy on Research Ethics and the UNISA Standard Operating Procedure for Research Ethics Risk Assessment.

- 7.1.15 Ethics approval does not automatically imply permission to conduct research involving UNISA employees, students or data.
- 7.1.16 UNISA has a right to know what will become of information obtained from UNISA employees, students or data, its intended use and application.
- 7.1.17 UNISA is responsible to govern information obtained from its employees and students as prescribed by existing national laws and university policies.

8. CONDITIONS FOR CONDUCTING RESEARCH INVOLVING UNISA EMPLOYEES, STUDENTS, ALUMNI, DATA AND NON-HUMAN HARVESTING OF DATA

- 8.1 The principles listed above translate into the following conditions that guide the conduct of research at UNISA:
 - 8.1.1 Before submitting an application for permission to conduct research involving UNISA employees, students, alumni, data and non-human harvesting of data, ethics approval must be obtained:
 - a) All health and health-related research must undergo prior ethics review and clearance through a Research Ethics Review Committee that is registered with the National Health Research Ethics Council (NHREC)
 - b) UNISA researchers and students need to obtain ethics approval from their College Research Ethics Review Committee as per the UNISA Policy on Research Ethics and the Standard Operating Procedure for Research Ethics Risk Assessment;
 - c) Non-UNISA researchers and students (including UNISA employees registered for qualifications at other universities) need to obtain ethics approval from the university they are registered or affiliated with, as well as from the UNISA Research Ethics Review Committee (URERC);
 - d) If the ethics approval was issued by a Research Ethics Review Committee registered with the National Health Research Ethics Council of South Africa or an equivalent structure in another country, non-UNISA researchers and students are exempted from obtaining ethics approval from the URERC provided that the RPC is satisfied that the proposed research is ethically and scientifically sound.
 - e) A research ethics certificate must specify the period for which it is valid with specific reference to the start and end date of the research.
 - 8.1.2 Participants or the institution should not be identifiable in any way from the findings of the research without explicit, written consent from the duly authorised party.
 - 8.1.3 Researchers and gatekeepers must take all appropriate precautionary measures to protect the personal information given to them in good faith and must not pass it on to third parties or institutions without the explicit consent of the data owner (research participants and/or UNISA).
 - 8.1.4 Researchers are encouraged to obtain personal information voluntarily from participants as part of their fieldwork activities, instead of requiring access to

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records pertaining to personal information simply because of ease of availability.

- 8.1.5 It is the responsibility of the researcher to treat information pertaining to UNISA employees, alumni, students or the institution, whether identifiable or de-identified, with the highest degree of confidentiality and responsibility.
- 8.1.6 The principal researcher is accountable for the integrity of the research and should ensure that all co-researchers are aware of the requirements and policies involved.
- 8.1.7 An applicant needs to state how research information will be secured, who will have access to it, for how long will it be stored and eventually how it will be disposed of.
- 8.1.8 A copy of the completed research output should be submitted to the secretariat of the Research Permission Committee (RPC) within 12 months from the completion of the research project.
- 8.1.9 A gatekeeper is responsible for:
 - a) representing and protecting the interests of the university;
 - b) facilitating/controlling the access to the information to the researcher as permitted by the RPC;
 - c) ensuring adherence to the policies of the university;
- 8.1.10 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;
- 8.1.11 The gatekeeper could assist with the randomisation of participants as requested by the researcher.

9. MANAGEMENT OF PERMISSION TO CONDUCT RESEARCH INVOLVING UNISA EMPLOYEES, STUDENTS, ALUMNI, DATA AND NON-HUMAN HARVESTING OF DATA AT UNISA

9.1 The overall responsibility for quality management of research permission and the Policy for Conducting Research Involving UNISA Employees, Students or Data at UNISA rests with Senate and is subject to approval by Council. Senate delegates the following to the parties specified below:

9.1.1 SRIPCC

The overall responsibility to ensure the implementation of sound research permission procedures at the university.

9.1.2 Vice Principal: Research, Postgraduate Studies, Innovation and Commercialisation

The provision of strategic leadership in research and innovation, including permission to conduct research involving UNISA employees, students or data.

9.1.3 Executive Director: Research, Innovation and Commercialisation

The responsibility of overseeing the management of research permission at the university.

9.1.4 RPC

- a) The SRIPCC assigns to the RPC its duty to grant permission to researchers to conduct research involving UNISA employees, students or data as required by the Policy for Conducting Research involving UNISA Employees, Students or Data;
- b) The Registrar assigns to the RPC the authority to provide permission to researchers to gain access to student information and records of the university based on sound research permission procedures. The RPC submits reports to the Registrar listing all application requests for access to student information and records;
- c) The Research Permission Committee (RPC) reviews applications to conduct research involving UNISA employees, students or data;
- d) The Research Permission Committee (RPC):
 - i) 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, 4 of 2013 stipulating the importance of ‘protection against unlawful collection, retention, dissemination and use of personal information’ (Preamble to Act)];
 - ii) has the authority to provide permission for researchers to involve Unisa employees, students or data in scientific rigorous and ethical research based on sound deliberation and practices;
 - iii) reviews applications for permission to ensure the protection of the rights of UNISA employees, students and safeguard the interests of the university;
 - iv) keeps a register of permissions granted for research involving UNISA employees, students or data for reporting to the SRIPCC;
 - v) recommends amendments to the Policy for Conducting Research involving UNISA Employees, Students or Data;
 - vi) 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
 - vii) sets standards to ensure that researchers adhere to the reporting obligations stipulated in the Policy for Conducting Research involving UNISA Employees, Students or Data.
- e) Appeals

An applicant who does not agree with a decision taken by the RPC may lodge an appeal based on the standard operating procedure for appeal against a decision of the RPC.

9.1.5 Research entities

- a) UNISA research entities are responsible for the management, operationalisation and quality assurance of research permission

procedures at each entity.

- b) Research entities are responsible to ensure that UNISA researchers and supervisors are informed and able to engage in sound research permission procedures and practices relevant to conducting research at UNISA.
- c) All applications are reviewed by and submitted to the RPC through the relevant College structure or representative to foster sound governance.

9.1.6 The university is responsible for providing adequate resources for permission to conduct research involving UNISA employees, students, alumni, data and non-human harvesting of data.

10. AVAILABILITY AND REVISION OF POLICY

- 10.1 To ensure the transparency of research management at UNISA, copies of this general research policy, and of all the specific policies and procedures to which it refers, are made available online on the UNISA intranet.
- 10.2 This policy, and specific policy documents to which it refers, are revised regularly (at least once in three years) to ensure that research permission at UNISA continues to be managed in the university's long-term interest. Proposed amendments to the policy must comply with the UNISA Policy on Policy/Rules Formulation.
- 10.3 As with any other policy, the success of this policy depends upon the way in which the various research entities concerned implement its directives.

11. POLICY OWNER AND CONSEQUENT MANAGEMENT

- 11.1 The Vice-Principal: RPSIC through the Research, Innovation, and Commercialization Department and Committees of Council oversees the implementation of this policy.
- 11.2 All members of the Management and Extended Management Committees are accountable for the implementation and monitoring of and reporting on this Policy within their respective areas of responsibility (KPA's) and spheres of influence.
- 11.3 Any member of staff, student or any person performing a duty or function for and/or on behalf of the university can be charged in terms of the university's Disciplinary code(s) if that person contravenes the letter and spirit of this policy.

12. IMPLEMENTATION OF POLICY

This policy becomes effective from the date on which Council approves it.

