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|  | **FACULTY OF HUMANITIES**  **STAFF MEMBERS’ TEMPLATE FOR ETHICS APPROVAL**  Proposal Template 2025.03.07 |

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| **DEPARTMENT** | Complete the grey-shaded blocks on the cover page |

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| **FIRST SUBMISSION** | Mark with an X | **RESUBMISSION** |  |

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| **STAFF MEMBER’S DETAILS** | **TITLE** | **INITIAL(S)** | | | | **SURNAME** | |
|  |  | | | |  | |
| **STAFF NUMBER** |  | | | | | | |
| **PROJECT TITLE** | Use Initial Caps (Title Case) | | | | | | |
| **ETHICS REVIEW REQUIRED**  Does your research involve collecting data from humans? | | | Yes |  | No | |  |

Use Arial, 12 font, single spacing and 2cm margins throughout the proposal.

Delete all yellow highlighted text, which serves as guidelines for completion of the proposal

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| **Introduction** |

Include the following (headings are not required):

* Brief introduction to the study
* Contextualisation
* Rationale/motivation
* Which leads to the problem statement – what bothers you or are you curious about that warrants a research response? What is the gap/niche for this study?
* Which leads to the study goal/aim, then the objectives (not action steps) (preferably numbered)

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| **Research Methodology** |

As a general guide, provide:

* A brief introduction to the study approach and design (e.g. qualitative or quantitative, exploratory or descriptive, case study, phenomenology, etc).
* Define the population, sample, sampling method and recruitment activities. Be as specific as possible, e.g. give intended sample size and motivation for sampling method.
* Describe the methods of data collection (tools, recording, etc). For quantitative tools, provide evidence of reliability and validity of the tools. For qualitative tools, provide the scope of the kinds of questions that will be asked, showing how these will help to answer the research questions.
* Describe how you will analyse your data.
* For qualitative studies, briefly explain how you will enhance the trustworthiness and rigour of your study.

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| **Ethical Considerations** |

For all research involving human participants (and any other research with ethical considerations, such as research on animals, human remains, etc) careful consideration must be given to the ethical risks and the methods to reduce such risk. This should be done in consultation with the university document called *Code of Academic and Research Ethics,* which can be obtained on the intranet. Avoid quotations or excessive theory, but do use citations to appropriate ethics literature. Should your research include vulnerable participants or activities specified in Section 2 of the template, you have to discuss how you will address ethical concerns related to these matters here. Further, indicate how basic principles of ethics in research will be adhered to, such as respect for persons (informed consent, voluntary participation and confidentiality), beneficence/nonmaleficence, and justice. This may be specific to each discipline. Also specify how you will store data in a secure manner to ensure the protection of participant anonymity/confidentiality.

In addition, complete the sections of this template after the reference list (Section B) which must be signed. Include an Information Sheet/Letter which will be provided to the participants as well as a separate Informed Consent Form.

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| **Section 2: Application to Research Ethics Committee** |

All research involving human participants must be approved by a Research Ethics Committee, even if the answers to the following questions are ‘No’. If you responded ‘Yes’ to any question below, you must elaborate on it the ‘Ethical Considerations’ section of the template.

**Does your research include the direct involvement of any of the groups of participants indicted in the table below?**

Yes \_\_\_\_\_\_ No \_\_\_\_\_\_

**If yes, indicate which group(s) with an X in the table below.**

**Your research proposal must address ethical aspects related to this specific group.**

|  |  |
| --- | --- |
|  | Children/youth under 18 |
|  | Persons with a cognitive disability/mental impairment |
|  | Prisoners or persons on parole |
|  | Persons highly dependent on medical care |
|  | Communities that may be considered as vulnerable |
|  | Persons unable to give consent |
|  | UJ employees or students |
|  | Persons not usually considered to be vulnerable, but could be considered vulnerable in the context of this research project |
|  | Individuals who may be considered vulnerable (e.g. pregnant women; abused persons; victimised persons) |
|  | Persons living in poverty or with little education |

**Does your research involve any of the following types of activity?**

Yes \_\_\_\_\_\_ No \_\_\_\_\_\_

**If yes, indicate which activity(ies) with an X in the table below.**

**Your proposal must explain how you will address the associated ethical aspects.**

|  |  |
| --- | --- |
|  | Covert observation of participants |
|  | Deception of participants or concealment of the purpose of the study |
|  | Examining potentially sensitive or contentious issues |
|  | Study of illegal activities that could place participants or the researcher at risk of criminal or civil liability or be damaging to their employability, professional or personal relationships |
|  | An intervention |
|  | Invasive medical / physiological procedures |
|  | Processing of personal information[[1]](#footnote-1) |

**Declaration by researcher/principal investigator**

I, the undersigned, declare that the standard practices of ethical professionalism will be upheld in the proposed research project. I undertake to bring to the attention of the Research Ethics Committee any changes to this project which may affect ethical matters pertaining to this project. Furthermore, I understand, acknowledge and undertake to adhere to the stipulations in the University document called *Code of Academic and Research Ethics,* which can be obtained on the intranet.

Signature of Researcher/Principal Investigator Date

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| **Information Sheet /Letter** |

Incorporate here the Information Sheet which provides the prospective participants with relevant information to enable them to decide on whether to participate or not.

**PROJECT TITLE:**

**RESEARCHER NAME:**

|  |
| --- |
| This invitation letter and informed consent form may contain some words that are unfamiliar to you. Please ask questions about anything you do not understand or anything you want to learn more about.  You may take home an unsigned copy of this consent form to think about or discuss with family or friends before making a decision.  Once you understand, and if you agree to take part, you will be asked to sign your name or make your mark on this form. You will be offered a copy to keep. |

**INTRODUCTION**

Hello, my name is [name]. I am a [student / staff] at the University of Johannesburg. I would like to invite you to take part in this study. I am conducting this research for my [degree or non-degree]. I have selected you to participate in this study [give a reason why they were selected].

**YOUR PARTICIPATION IS VOLUNTARY**

Before you decide whether to be in this study, I would like to explain the purpose, the risks and benefits, what is expected of you and what you can expect from me.

It is up to you whether or not you join the study

You may choose to leave this study at any time

**AIM OF THE STUDY**

[brief and simple explanation of the aim]

**RESEARCH**

[Explain the procedures – focus groups, in depth interviews, questionnaire interviews etc.].

[Specify very briefly the topics to be covered; scope of inquiry]

[Sample text: During the interview I will write down what you say. I will also record the interview using a voice recorder. We will use a voice recorder to make sure we record your words exactly how you said them. The notes and the recording will not contain your name or other identifying information and will be stored on a computer that is password protected.

**What are my rights as a participant?**

Your participation is voluntary. You are free to decide if you want to take part in the research. You can refuse to participate or stop at any time without giving any reason.

**Are there any risks or discomforts involved in the study?**

[Explain if there are risks. Explain if there is the possibility of discomfort or distress with sensitive issues, or of other possible harms or negative consequences of participating in the study].

**Are there any benefits?**

[Usually, the benefits are the production of knowledge of a particular area of research. Need to state that there are no immediate material benefits].

**Is there any cost to me taking part in the interview?**

[State if there are any material costs].

**Will I be paid?**

[No payment but in some cases, participants may be reimbursed for travel costs if relevant].

**Will what I tell you remain confidential?**

[Explain how confidentiality will be maintained].

[Explain their right to privacy].

**ETHICAL APPROVAL**

[Standard text: ‘This study proposal has been approved by the University of Johannesburg Faculty of Humanities Research Ethics Committee’].

**PROBLEMS OR QUESTIONS**

If you ever have any questions about this study, you can contact:

Researcher contact details

Ethics Committee contact details

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| **Informed Consent Form** |

Incorporate here the Informed Consent Form which will be signed by the participants.

I hereby confirm that I have been informed about my involvement in this research.

I have also received, read (or had it read to me) and understood the above-written information regarding the study.

I understand that what I say will be written down and / or audio or video recorded.

I also agree that the data collected during this study can be processed in a protected computerized system.

I may at any stage, without prejudice, withdraw my consent and participation. I am not required to give a reason for withdrawal.

I have had sufficient opportunity to ask questions and (of my own free will) declare myself prepared to participate.

**SIGNATURES:**

[Note: that there are some instances where signed consent may be substituted with verbal consent; the researcher will sign the form on behalf of the participant after having received verbal consent]

I have read this consent form (or had it read and explained to me), and all of my questions have been answered to my satisfaction. My signature below confirms that:

□ I agree to participate in the study

**Signature of participant:**

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_

**Researcher Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Permission to Audio or Video Record**

My signature below confirms that:

□ I DO NOT give the research staff permission to audio/video-record my interview

□ I give the research staff permission to audio/video-record my interview

**Participant Signature:**

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_

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| **Section 3: Protection of Personal Information** |

All applications for ethical clearance must be accompanied by a completed Personal Information Impact Assessment (PIIA) form. If your study involves the collection of personal information, complete the entire PIIA form below. If your study does not involve the collection of personal information, complete the PIIA form until question 2.1.



**FACULTY OF HUMANITIES\_\_\_\_\_\_\_\_\_\_\_\_\_**

RESEARCH ETHICS COMMITTEE

**Personal Information Impact Assessment**

**Research**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Section 1: Application Details** | | | | |
| 1.1 | Research Proposal Title |  | | |
| 1.2 | Department |  | | |
| 1.3 | Research Type | |  |  |  |  | | --- | --- | --- | --- | | Qualification |  | Non-qualification |  | | | |
| 1.4 | Student/Researcher First Name  List all names for group projects |  | | |
| 1.5 | Student/Researcher Last Name  List all names for group projects |  | | |
| 1.6 | Student/Staff Number  List all numbers for group projects |  | | |
| 1.7 | Supervisor  Initials & Last Name |  | | |
| 1.8 | Co-supervisor(s)  Initials & Last Name |  | | |
| 1.9 | Application Date |  | Proposal Version |  |

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| **Section 2: Applicability** | | |
| 2.1 | Does this research involve the processing1 of personal information?2 | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
|  | 1 All activities that involve identifiable personal information – from collection to destruction.  2 Any information that relates to an identifiable, living individual or an identifiable, existing juristic person (i.e. company or other organisation). Please see notes about whether research data contains identifiable information at the end of this document for further guidance in answering 2.1. | |
| 9 | If the answer is [No], please provide an explanation below of (i) how the research data have been de-identified or (ii) how the research data have been collected without identifiers (also explain how it is not possible to re-identify the research data in either case). | |
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| 9 | If the answer is [Yes], please complete sections 3 –11. | |

*\*Boxed terms are defined at the end of the document.*

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| **Section 3: Inherent Risk Assessment** | | |
| 3.1 | Will the research participants include children (minors), or will the research involve special personal information? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.2 | Will the research involve processing of personal information on a large scale? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.3 | Will the research involve the evaluation or scoring of Personal Information to make automated decisions (no human involvement in the decision) with legal consequences or that will have a significant effect on research participants? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.4 | Will the research involve processing where researchers are getting research participants’ personal Information from sources other than the research participant themselves? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.5 | Will the personal information of research participants be disclosed to third parties? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.6 | Are any people or organisations that will have access to the personal Information located in another country? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.7 | Will unique identifiers be used to link, combine, compare, or match personal Information from multiple sources? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.8 | Does the research involve the use of new technology or technology that is, or might be, perceived by individuals as intrusive on their privacy? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.9 | Would the processing of personal information contemplated by the researchers be outside of the reasonable expectations of the individuals? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 3.10 | Will the research involve contacting or interacting with individuals in ways they might find intrusive? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to any of the above questions is [Yes], the research must be classified as high risk (see section 4 below). | |

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| **Section 4: Risk Classification** | | |
| 4.1 | Risk category (based on section 3 above). |  |

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| **Section 5: Self-assessment | Processing Limitation** | | |
| **5.1 Minimality** | | |
| 5.1.1 | Is it necessary to collect all the (proposed) personal information? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 5.1.2 | Is there a less intrusive way to process the personal information (is it possible to pseudonymise the information)? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 5.1.2 is [No], please give a short explanation in the box below (5.1.3). | |
| 5.1.3 |  | |
| **5.2 Legal Justification** | | |
| 5.2.1 | Will the participants be asked for POPIA consent? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 5.2.1 is [Yes], please answer 5.2.2. | |
| 5.2.2 | Is there a separate POPIA information letter and consent form attached to the research proposal/protocol? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 9 | If the answer to 5.2.1 is [No], please answer 5.2.3 - 5.2.10. | |
| 5.2.3 | If the research involves children, will the parent or guardian of each child participant be asked for POPIA consent? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 5.2.4 | Is the research required by law? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 5.2.5 | Is the research conducted by a public body performing a public law duty? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 5.2.6 | Is the research in the legitimate interest3 of the responsible party, of a third party to whom the personal information is supplied, or of the research participants? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 5.2.7 | If the research is high risk, is the research in the public interest? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 5.2.8 | If the research is high risk, is it impossible, or would it require a disproportionate effort to get POPIA consent? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 5.2.9 | If the research is high risk, has the research participant deliberately made the personal Information public? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 5.2.10 | If the research involves children, has the child made the personal information public deliberately with the POPIA consent of a competent person? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
|  | 3 In general, if the responsible party, research participants or a third party benefit from the research then an argument can be made for legal justification on the grounds of a legitimate interest. | |

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| **Section 6: Self-assessment | Purpose Specification** | | |
| **6.1 Document the Purpose of the Research** | | |
| 9 | Confirm if any of the following are being collected (are these documented in the research proposal?): | |
| 6.1.1 | 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 or birth of the participant. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.2 | Information relating to the education or the medical, financial, criminal or employment history of the person. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.3 | Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or another particular assignment to the participant. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.4 | Correspondence sent by an identifiable participant that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | Are the following documented in the research proposal/protocol? | |
| 6.1.5 | The aim and objectives for collecting/processing the above personal information? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.6 | The number or participants and how they will be recruited and contacted? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.7 | How the personal information will be collected and stored? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.1.8 | If the personal information will be shared, with whom and how? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 6.1.9 | Whether any new or innovative technology will be used to process the personal information? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| **6.2 Retention & Restriction of Records** | | |
| 9 | Are the following documented in the research proposal/protocol? | |
| 6.2.1 | The retention period for personal information? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.2.2 | A justification for the retention period (i.e. the reason why personal information must be retained for a specific period of time, particularly if this time extends beyond immediate use for the proposed research)? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 6.2.3 | If personal information must be retained beyond the period of immediate use for research, will it be pseudonymised? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 6.2.4 | If personal information must be retained beyond the period of immediate use for research, access is restricted to people requiring this for the purpose of the retention? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 6.2.5 | How the personal information will be destroyed (in a way that prevents re-identification)? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

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| **Section 7: Self-assessment | Further Processing Limitation (Secondary Use of Personal Information)** | | |
| 7.1 | Will there be further processing of personal information? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 7.1 is [Yes], please complete 7.2 – 7.10. | |
| 7.2 | Will the personal information used for further processing be pseudonymised? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 7.3 | If it is special personal information, does the research serve a public interest and is the information necessary for that purpose? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 7.4 | If it is special personal information, would it involve disproportionate effort or be impossible to obtain POPIA consent for further processing? | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 7.5 | If it is special personal information of children, can the researcher(s) ensure that further processing will not adversely affect the privacy of the children concerned. | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 7.6 | Is the purpose for which the personal information is being used (i.e. secondary use) different from the original purpose? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 7.6 was [Yes], are the following described in the research proposal/protocol? | |
| 7.7 | The circumstances under which the original data was collected and the information that was disclosed to the original participants regarding the purpose of the original research. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 7.8 | Measures to be taken to ensure that no identifiable data is disclosed. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 7.9 | If POPIA consent is going to be obtained for further processing, how information about the research will be communicated to the original participants and how their consent will be obtained. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 7.10 | Whether the researcher(s) have gatekeeper permission (in writing) from the responsible party who initially collected the information to be used for further processing. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

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| **Section 8: Self-assessment | Information Quality** | | |
| 9 | Are the following described in the research proposal, where necessary? | |
| 8.1 | The source of the personal information and the extent to which it can be considered accurate and reliable (including information about this where applicable). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 8.2 | The use of data quality reviews where appropriate, including the methodology used in the data quality review(s) or any reasons why data quality reviews were not done. | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 8.3 | Whether research participants have or will be granted access to their own personal information (and if this is not the case, the reason(s) for not granting access). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 8.4 | How personal information quality is managed (i.e. is it under central management with copies allowed only under specific conditions). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 8.5 | If the research involves a questionnaire, steps that have been taken to enhance accuracy of the questions. | |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Yes |  | No |  | N/A |  | |
| 8.6 | Steps that have been taken to minimise the risk of bias that may be present in personal information to be used for further processing. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

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| **Section 9: Self-assessment | Security Safeguards** | | |
| 9 | Are the following described in the research proposal, where necessary? | |
| 9.1 | Risk-appropriate measures in place to address (i) access control and authentication, (ii) communication security, (iii) use of mobile devices, home networks and removable media, (iii) physical security (for hard copies of data) and redundancy (backup strategy) for personal information. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9.2 | Details about the implementation of pseudonymisation, including any justification of not using pseudonymisation for high risk personal information. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9.3 | Use of restricted environments for the processing of high risk personal information. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9.4 | A security compromise incident reporting and response procedure. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9.5 | Steps that participants can take to (i) withdraw POPIA consent and (ii) access their own personal information (if applicable – if not, what the reason is for not being able to access their personal information). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

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| **Section 10: Self-assessment | Transborder Information Flows** | | |
| 10.1 | Will the research involve transborder personal information flows (from South Africa to another country)? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 10.1 is [Yes], please complete 10.2 – 10.4 (are the following described in the research proposal/protocol)? | |
| 10.2 | The nature and type of transborder information flows applicable to the research. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 10.3 | Any agreements that must be in place, where applicable (if necessary, these agreements must be concluded at the time of research proposal/protocol approval). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 10.4 | What level of legal protection is in place for transborder information flows from South Africa to another country. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

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| **Section 11: Self-assessment | Prior Authorisation** | | |
| 11.1 | Will the research involve processing of any unique identifiers for a purpose other than the one that the identifier was intended when collected and will these identifiers be used to link information processed by another responsible party together? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 11.2 | Will the research process information on criminal behaviour, unlawful or objectionable conduct on behalf of third parties? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 11.3 | Will the research transfer special personal information or the personal information of children to a third party in a foreign country that does not provide an adequate level of protection for the processing of personal information (i.e. the same level as POPIA). | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 9 | If the answer to 11.1 or 11.2 or 11.3 is [Yes], please complete 11.4 – 11.5 (are the following described in the research proposal/protocol)? | |
| 11.4 | The need for prior authorisation from the information regulator? | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |
| 11.5 | A description of how and when prior authorisation will be obtained and a statement that no data collection will commence until prior authorisation is in place. | |  |  |  |  | | --- | --- | --- | --- | | Yes |  | No |  | |

|  |  |  |
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| **Section 12: Signatures** | | |
| 12.1 | Signature of supervisor/researcher |  |

**Self-Assessment Guide**

The following self-assessment guide is additional information that is provided to assist researchers in interpreting the responses above to (i) offer more guidance in the POPIA compliance process and (ii) outline further detail that may be needed in the research proposal, as applicable.

**Sections 3 and 4**

1. The relevance of classifying research as high risk is that the POPIA specifies certain things that need to be done if this is the case. These are:

* The REC needs to confirm that a PIIA (as contained in this document) has been done.
* The REC must ask researchers to confirm periodically that they have implemented the measures described in the research proposal to protect personal information.
* The REC must ensure that the personal information is pseudonymised unless there is a compelling reason why it is not feasible or appropriate.

**Section 5**

1. It is important that, if consent to collect and process personal information – what is sometimes referred to as ‘POPIA consent’ – is feasible, this information and consent is completely separate from consent to participate in the research. Please use the REC 19.0 form as a template for POPIA consent and the REC 11.0 form as a template for research consent. Both must be attached to the research proposal as separate annexures if personal information is being collected and processed.
2. POPIA consent is considered the default legal justification. A compelling reason and another valid legal justification must be given in the research proposal (and indicated in 5.2) if the answer to 5.2.1 is [No].
3. In 5.2.4 – 5.2.7, for any options selected as [Yes] a supporting explanation must be given in the research proposal.
4. In 5.2.8 – 5.2.10, please explain the relevant details in the research proposal and provide any supporting evidence required. In particular, the reason why POPIA consent cannot be obtained for high-risk research must be clearly and fully explained.

**Section 6**

1. In 6.1.1 – 6.1.4, justification for collection of any of these variables must be given in the research proposal. A clear argument must be made for the necessity of their inclusion. If any of the variables relate to the theoretical framework or background of the proposed research, this must be explained in the literature review and supported by the citation of appropriate references.
2. In 6.1.5 – 6.1.9, if any of the responses is [No] on initial impact assessment the research proposal must be revised so that all responses are [Yes] by the time of application for ethical clearance.
3. In 6.2.1 – 6.2.5, if any of the responses is [No] on initial impact assessment the research proposal must be revised so that all responses are [Yes] by the time of application for ethical clearance.

**Section 7**

1. If the answer to 7.2 is [No], this must be explained in the research proposal.
2. For 7.3 – 7.5, please ensure that there is adequate supporting explanation of any [Yes] responses in the research proposal.
3. For 7.7 – 7.10, please ensure that there is adequate supporting explanation of any [Yes] responses in the research proposal.

**Section 8**

1. For 8.1 – 8.6, please ensure that there is adequate supporting explanation of any [Yes] responses in the research proposal. If any of the responses is [No] on initial impact assessment the research proposal must be revised so that all responses are [Yes] by the time of application for ethical clearance.

**Section 9**

1. For 9.1 please ensure that all of the sub-items are explained in the research proposal or, if they are not, why they are not applicable.
2. For 9.2 please clearly explain and justify why pseudonymisation is not done if this is the case.
3. For 9.3 – 9.5 please ensure that explanations are given in the research proposal for [Yes] responses. If any of the responses is [No] on initial impact assessment the research proposal must be revised so that all responses are [Yes] by the time of application for ethical clearance.

**Section 10**

1. If transborder personal information flows are applicable, please ensure that all of the information required by 10.2 – 10.4 is clearly explained in the research proposal. If any of the responses is [No] on initial impact assessment the research proposal must be revised so that all responses are [Yes] by the time of application for ethical clearance.

**Section 11**

1. If any of the requirements for prior authorisation are met (11.1 – 11.3) there must be an acknowledgement in the research protocol/proposal that prior authorisation is required and a description of how and when this will be done (this is done by application to the information regulator).
2. There must also be an acknowledgement that no data collection will start until prior authorisation has been obtained in writing from the information regulator.
3. Prior authorisation is a significant compliance matter – processing personal information where prior authorisation is required without the latter is an offence in terms of s59 of the POPIA.

**Definitions**

1. **Special Personal Information**: Examples:

* *Religious and philosophical beliefs*: e.g., church membership, climate change denialism or ethical veganism.
* *Race or ethnic origin*: e.g., membership to a population group, culture, ancestry, territorial possession, language, or forms of dress.
* *Trade union membership*.
* *Political persuasion*: e.g., membership to a political party, political opinions or voting records.
* *Health*: e.g., any information on physical or mental injury, disease, disability or disease risk, including medical history, medical opinions, diagnosis and clinical treatment; medical examination data, test results, data from medical devices, or data from fitness trackers; information collected from a research participant when they register for health services or access treatment; any appointment details, reminders and invoices which reveal the health status of a research participant; any other information or behaviour that reveals a past, present or future physical or mental health status; administrative documents that reveal health status such as medical certificates, forms concerning sick leave or the reimbursement of medical expenses; inherited characteristics or genetic data.
* *Sex life*: e.g., information about a research participant's sexual activity, relationships, sexual orientation, or sexual proclivities.
* *Biometric information*: the information that results from specific technical processing relating to the physical, physiological, or behavioural characteristics of a research participant, such as facial images or dactyloscopic or genetic data when it is linked with other personal information to identify a data subject.
* *Criminal behaviour*: information from a data subject relating to the alleged commission of an offence or proceedings relating to an alleged offence. (criminal convictions).
* Any information from a child (a data subject < 18 years of age) is special personal information.

1. **Further Processing**: Reusing personal information for a purpose other than the original purpose it was processed for.
2. **Large Scale**: Processing is considered on a large scale if:

* Many research participants are involved; or
* A large proportion of a population is involved; or
* A large volume of personal information will be collected (even if there are only a few research participants); or
* the processing will take place over a long period (e.g., longer than the average research activity).

1. **Third Parties**: People or organisations that have not previously had access to the personal information (including external collaborators, funders, service or system providers, and cloud hosting services).
2. **Public Interest**: If the research process or outcome widely and generally benefits the public at large or a group, community or specific population (as opposed to a few individuals or a single entity).
3. **Competent Person**: A person with parental responsibilities in terms of the Children’s Act 38 of 2005.
4. **Responsible Party**: A public or private body or any other person which, alone or in conjunction with others, determines the purpose

of and means for processing personal information.

**Notes on Personal Information**

The POPIA only applies to identifiable personal information (according to s6(b) of the Act it does not apply to personal information “*that has been de-identified to the extent that it cannot be re-identified again*”). To de-identify personal information means (from s1 of the Act):

*“to delete any information that— (a) identifies the data subject; (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or (c) can be linked by a reasonably foreseeable method to other information that identifies the data subject.”*

The term “de-identify” implies that the information was identifiable at the start. However, quite often in research, researchers purposefully do not collect any identifiers from participants. The same test would apply in this case – the Act would not apply to information that, from the point of collection, does not contain any information as specified above (subsections (a) – (c)). Please note that, even if a researcher is situated outside South Africa and research data is being collected outside South Africa, POPIA compliance is required if the researcher is a student registered at UJ or a staff member or post-doctoral research fellow at UJ.

|  |
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| **Information Sheet /Letter for Studies Collecting Personal Information** |

Incorporate here the POPIA Information Sheet which provides the prospective participants with relevant information to enable them to decide on whether to participate or not.

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**DEPARTMENT OF** Click here to enter your Department name.

**PERSONAL INFORMATION LETTER**

**REC 19.0**

**Good Day**

My name is Click here to enter your first name and surname. **I WOULD LIKE TO INFORM YOU** about personal information of yours that I would like to collect as part of my research study on Click here to enter your research title.

Before you decide on whether to allow me to collect and process (use) your personal information, I would like to explain to you why I would like to do this, and other details related your personal information. You should think about this information together with the information about participating in the research, which you will have just been told about.

Below, I have compiled a set of questions and answers that I believe will assist you in understanding the relevant details of the collection and processing of your personal information for this research. Please read through these. If you have any further questions, I will be happy to answer them for you.

1. **WHAT IS PERSONAL INFORMATION?** Personal information is any information that relates to an identifiable, living person (or an identifiable company or other organisation). Examples include your name, date of birth, ID number, phone number, email address etc. or a wide range of other information that can be linked to these identifiers.
2. **WHY DO YOU NEED TO COLLECT AND PROCESS MY PERSONAL INFORMATION?** I need to collect and process your personal information for the purposes of your participation in the research that has been explained with the title above.
3. **HOW WILL MY PERSONAL INFORMATION BE COLLECTED AND PROCESSED?** Click here to enter a detailed description of how the personal information will be collected, in simple language understandable by a lay person.
4. **HOW AND WHERE WILL MY PERSONAL INFORMATION BE STORED?** Click here to enter a description of how and where the personal information will be stored. Please use language that a lay person will understand.
5. **FOR HOW LONG WILL MY PERSONAL INFORMATION BE STORED?** Your personal information will be stored for as long as it is needed for the research process. I estimate that this will be Click here to enter the estimated duration that personal information will be retained for).
6. **WHO WILL HAVE ACCESS TO MY PERSONAL INFORMATION?** Your personal information will be accessible by Click here to enter a list of people who will have access to the personal information (usually only the researchers).
7. **WHAT MUST I DO IF I WANT ACCESS TO MY OWN PERSONAL INFORMATION?** If you want access to your own personal information, you should contact me using the contact details given below.
8. **WHAT MUST I DO IF I DON’T WANT MY PERSONAL INFORMATION TO BE USED ANYMORE?** If you do not want your personal information to be used in the research anymore you should contact me immediately using the contact details given below and I will explain to you how your personal information will be removed and what happens after that. You can request that your personal information is removed at any time (for as long as the personal information is kept by me) without any consequences.
9. **WHAT HAPPENS IF OTHER PEOPLE POSSIBLY GET ACCESS TO MY PERSONAL INFORMATION?** If this happens, I will first assess the risk of what has happened and how likely it is that your personal information can actually be accessed by other people (precautions are taken as described above to protect your personal information even if someone gets access to where it is stored). If there is a risk that your personal information can be accessed by others, I will contact you and tell you about the details and what I am doing about the situation.

My details, if you need to contact me, are:

Click here to enter your first name and surname.

Click here to enter your contact telephone number.

Click here to enter your email address.

You may also contact my research supervisor:

Click here to enter your supervisor’s title, first name and surname.

Click here to enter our supervisor’s email address.

If you feel that any questions or complaints regarding the collection and processing of your personal information for this study have not been dealt with adequately, you may contact the Chairperson of the Faculty of Humanities Research Ethics Committee at the University of Johannesburg:

Name of Chairperson:

Email: [humanitiesethics@uj.ac.za](mailto:humanitiesethics@uj.ac.za)

|  |
| --- |
| **POPIA Informed Consent Form** |

Incorporate here the POPIA Informed Consent Form which will be signed by the participants.

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**DEPARTMENT OF** Click here to enter your Department name.

**PERSONAL INFORMATION CONSENT FORM**

**REC 19.0**

Click here to enter the title of your research study.

Please initial each box below:

I confirm that I have read and understand the personal information letter dated Click here to enter the date, as is appears on the information sheet. for the above study. I have had the opportunity to consider the information, ask questions and have had my questions answered satisfactorily.

I agree to my personal information being collected and processed for the above research.

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Name of Participant Signature of Participant Date

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Name of Researcher Signature of Researcher Date

1. Engagement in any activities that involve identifiable personal information – from collection to destruction. Personal information refers to any information that relates to an identifiable, living individual or an identifiable, existing juristic person (i.e. company or other organisation). Please see notes about whether research data contains identifiable information at the end of this document for further guidance in answering. [↑](#footnote-ref-1)