UNIVERSITY OF CAPE TOWN
IYUNIVESITHI YASEKAPA • UNIVERSITEIT VAN KAAPSTAD

ETHICS CLEARANCE AND PERMISSION TO ENGAGE UCT STAFF AND/OR STUDENTS OR IDENTIFYING INDIVIDUAL DATA THEREOF IN RESEARCH

Standard Operating Procedure

[Last updated February 2014]

1. STATEMENT OF PURPOSE: Whereas the UCT Department of Human Resources and the UCT Department of Student Affairs, respectively, are responsible for well-being of staff and students and supporting the capacity of staff and students to contribute to the university and its intellectual life; whereas the research interests of investigators at UCT at all levels from students to senior faculty may relate to staff and students as subjects and/or participants in vital research questions; and whereas the ability for staff and students to participate in research is to be both used and conserved as a valuable, collective resource, this Standard Operating Procedure is established.

   The intention of this Standard Operating Procedure is to create a collaborative milieu seeking best practice in all research into the UCT community, to promote generation of knowledge, to protect the University and the participants from foreseeable harm, and to spread the burden of impacts upon researched persons, all in a transparent and publicly accountable manner.

2. APPLICABILITY: This Standard Operating Procedure applies to any proposed research into the UCT community, in whole or part, including research conducted or led by departments, divisions or units using staff and student cohorts of their own or collaborating UCT structures, whether the research is of a developmental nature or otherwise. This Standard Operating Procedure applies both to requests for data and for requests that contemplate interactions or interventions involving students or staff as research participants.

   Requests to access to UCT staff and/or students for other non-research purposes including but not limited to class projects, training exercises, and creative works shall be reviewed in a parallel process, as appropriate, by the Executive Director: Human Resource for staff and the Executive Director: Student Affairs for students.

   Requests for data about and/or access to UCT alumni must be separately addressed to Deputy Director and the Senior Manager for Research and Information System, Department of Alumni and Development.

3. DEFINITION OF RESEARCH: Research is defined as "a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge." For purposes of providing access to students, staff, and/or individual-level data about students and staff, the University adopts this definition of research as codified in United States Health and Human Services regulations at 45 CFR 46, consistent with the usage of this definition among various faculty-level Research Ethics Committees at UCT.

4. PERMISSION: Permission to access UCT staff and/or students as research participants or subjects may be granted by the Executive Director: Human Resource for staff and the Executive Director: Student Affairs for students. Permission to recruit UCT staff and/or students for research does not obligate the University to prepare and provide sorted data. E.g. some researchers may request specific data elements (year of birth, immigration status, affiliations by race, ethnicity, religion, etc.), the production of which in the form of a data set that may be released from the institution to the researcher may require significant effort in preparation. Researchers who anticipate special data preparation needs must confer with the appropriate data custodians as early as possible to establish whether the data will be available, and if so to ensure the timely availability and preparation of the data required for a given research study. Fees may apply; there may be a cost that the researcher will have to be prepared to meet. Approval and permission under this Standard Operating Procedure does not guarantee the feasibility of production of data by a UCT custodian.

5. APPLICATION: To apply for permission to access UCT staff and/or students for research, the researcher must submit the following information:
   - A statement that requests permission to recruit UCT staff and/or students, or data about UCT staff and/or students, and a description of any interactions or interventions planned in the course of the research. The statement must address the domains of University and staff or student profile vulnerability to possible outcomes or findings of the research, and how the design of the research provides a favourable balance of possible risks of harm and potential benefits for participants as well as for the University.
   - A copy of the research protocol. This may be a copy of the submission provided to the REC of oversight.
   - A copy of planned communications with UCT staff and/or student research participants including, for example, consent forms, information sheets, study brochures, login screenshots, or other instruments that mediate the relationship between researcher and participant.

   Please note that requests cannot be processed in the absence of the above mentioned information; incomplete applications will not be processed.

6. EVALUATION: In accordance with this Standard Operating Procedure the Execturive Director, Human Resources and/or Executive Director, Department of Students Affairs will determine:
   - Whether and to what extent to permit access to staff (ED: HR) and/or students (ED: DSA), and/or data about staff and students in support of the proposed research.
   - Who will provide access to staff or student populations and, in particular, access to names and contact details of the target population(s); and
   - Any limitations and/or conditions associated with the access such as, for example, reporting requirements, procedures to address participant complaints, and any restrictions on redisclosure of data or requirements for return or destruction of primary data upon completion of the research.

7. APPROVAL REQUIREMENTS: No research into a UCT staff or student target population may be conducted by parties within or beyond UCT, without prior ethics review and approval or clearance for the study proposal.

- For researchers affiliated with UCT, ethics clearance must be obtained from the Research Ethics Committee of the appropriate Faculty, usually that of the researcher. In addition to the requirements of the reviewing REC, researchers must comply with UCT processes for permission to access the targeted study population. Researchers must also familiarise themselves with UCT policies and procedures for research ethics: http://www.uct.ac.za/about/policies/
- External researchers working with one or more UCT researchers and engaging in research with UCT student and/or staff participants must obtain clearance from the appropriate UCT REC, be named in the research protocol, and be identified with specific research activities.
- External researchers working independently and for whom UCT is a research site (engaging UCT in human subjects research) will need REC approval for research with UCT student and/or staff participants. Approval must be obtained from the REC of closest scholarly, disciplinary, or methodologic connection to the proposed research.

8. EVALUATION PROCESS:

8.1 The University has assigned authority to

- The **Executive Director: Human Resource** (currently Ms Miriam Hoosain) to grant or withhold permission to access a **staff population** for research purposes, after necessary consultation, which should include consultation with the staff representative body (or bodies) or trade union(s) concerned, if appropriate. The Executive Director may also grant permission to access **data** about a staff population. In each case, such permission to access is subject to ethics approval being granted by the REC of oversight, to feasibility and other applicable restrictions if any; and
- The **Executive Director: Student Affairs** (currently Dr Moonira Khan) to grant or withhold permission to access a **student population** for research purposes, in consultation, as appropriate, which may include consultation with the Student Representative Council. The Executive Director may also grant permission to access **data** about a student population. In each case, such permission to access is subject to ethics approval being granted by the REC of oversight, to feasibility and other applicable restrictions if any.

8.2 The person(s) considering granting permission to access must consider, *inter alia*

- The disruption and burden, if any, to the participants;
- The costs of access and how these costs will be met; and
- The benefits to UCT or to society in general that might be realistically attributable to the research or to its prospective findings.
- The volume and frequency of research requests to access the same or substantially similar participants for similar research purposes.

8.3 The review of a request to access UCT staff and/or students for research purposes will be handled as promptly as can be practically accommodated relative to the other duties and assignments for which the Executive directors of Human Resource and Students Affairs are responsible. When developing their research plans, researchers should allocate at least 10 business days for the review process.

9. COORDINATION WITH RESEARCH ETHICS COMMITTEE APPROVAL:

As the ethics clearance process necessarily involves rigorous consideration of the entirety of the research proposal, ethics clearance from the REC of oversight must ordinarily be resolved first, and documented in a written memorandum. Researchers are advised that the university has distinct interests in care for its staff, students, and data about its staff and students. There may be occasions under this policy in which the responsible Executive Director(s) may ask or require modifications to an approved protocol before finalising a matter of access, and it is the responsibility of the researcher to attend to such modifications. In the event of a conflict between an REC approved protocol and the required standards or criteria of the Department of Human Resources or Department of Student Affairs, the researcher may seek the engagement of the Office of Research Integrity (Research Office) to assist in finding an acceptable accommodation of interests.

10. Executive Directors of Human Resource and Student Affairs must, in writing, communicate their respective decision(s) about a request to the REC of research oversight so as to ensure clarity about the status of research proposals.

Original version: 29 October 2009
Revised version: 14 February 2013; 21 February 2014

ORIGINAL VERSION:
Destination: Research Handbook; Research Portal; Faculty RECs and Faculty Research Committees; URC and SEC/Senate for formal approval.
Note: the document has been circulated to Faculty RECs and Faculty Research Committees to ensure standardised approaches

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