

APPENDIX A:

GUIDANCE DOCUMENT FOR NORTH-WEST UNIVERSITY RESEARCH DATA GATEKEEPER COMMITTEE (NWU-RDGC) AND RESEARCH ETHICS COMMITTEES (RECS) RECEIPT, REVIEW, AND APPROVAL PROCESSES RELATED TO NWU DATA, STAFF, STUDENTS OR SYSTEMS/DEPARTMENTS/LABORATORIES

1. Introductory statement

Irrespective of the scope and responsibilities of the NWU-Research Data Gatekeeper Committee (NWU-RDGC) and the NWU Research Ethics Committees (RECs), to be discussed in the table below, the approved processes for *all internal research* of all academics, students or other parties will be followed as indicated in the NWU Research Ethics Policy, the NWU Research Ethics Committees Terms of Reference, and the Research Ethics Committees Scope document (available on the NWU research ethics webpage):

- 1) First it will be reviewed by a Scientific Committee (SC);
- 2) Followed by a review by the appropriate REC;
- 3) Referred to the NWU-RDGC, in cases identified in the scope and responsibilities indicated in the table below.

All *external research requests* will use the NWU-RDGC office administration, as their first point of contact, from where it will be distributed for the next step in the process:

- 1) The NWU-RDGC; and/or
- 2) the appropriate REC.

2. Scope and responsibilities of the NWU-RDGC and RECs related to research using NWU data (secondary data use); or wanting to involve NWU staff, students, or systems/departments/laboratories in research (primary research); or other parties wanting to involve NWU staff or students for non-research purposes

RDGC	RECs
<p>Purpose:</p> <p>1) To be a gatekeeper by <i>receiving, reviewing, and approving</i> all requests from NWU researchers wanting to use NWU data related to staff, students, or systems/departments/laboratories, originally gathered for other purposes than research, to be used for research purposes (secondary data use). The RDGC takes responsibility for communication with the researcher.</p>	<p>Purpose:</p> <p>1) To <i>receive, review and approve</i> all requests from NWU researchers intending to involve NWU staff, students, or systems/departments/laboratories to collect research data for the first time (primary research). The REC takes responsibility for communication with the researcher.</p> <p><i>*The REC reports on a quarterly basis (template) to NWU-RDGC.</i></p>

<p>2) To be a gatekeeper by <i>receiving and referring</i> requests from external researchers wanting to utilise NWU data related to staff, students or systems/departments/laboratories, originally gathered for other purposes than research, to be used for research purposes (secondary data use) or gathered for research on additional research outcomes, to RECs for <i>ethics review</i> (expedited and context focused), and then to <i>review and approve as a gatekeeper</i>, for secondary data use or for additional research outcomes. The NWU-RDGC takes responsibility for communication with the external researcher.</p>	<p>2) To <i>review</i> the research ethics (through an expedited process) of requests <i>referred to the REC</i> by the NWU-RDGC from internal or external researchers wanting to utilize NWU data related to staff, students, or systems/departments/laboratories, originally gathered for other purposes than research, to be used for research purposes (secondary data use) or gathered for research for additional outcomes. The response is sent back to the NWU-RDGC to take responsibility to communicate with the external researcher.</p> <p><i>*Should an REC receive a direct request from an external researcher, they should refer the researcher to the NWU-RDGC office administration as their first step.</i></p>
<p>3) To <i>receive and refer</i> all requests from external researchers who want to do research that will involve NWU staff, students, or systems/departments/laboratories, in order to collect research data for the first time (primary research) to an appropriate REC for ethics review and approval (expedited). The REC takes responsibility for communication with the external researcher.</p> <p>All external SoTL requests must also first be sent to the NWU-RDGC office administration.</p>	<p>3) To <i>receive, review and approve</i> (through an expedited process) requests <i>referred to the REC</i> by the NWU-RDGC from external researchers wanting to use NWU staff, students, or systems/departments/laboratories to collect research data for the first time (primary research). The REC takes responsibility for communication with the external researcher.</p> <p><i>*Should an REC receive a direct request from an external researcher, they should refer the researcher to the RDGC office administration as their first step.</i></p> <p><i>*The REC reports on a quarterly basis (template) to NWU-RDGC.</i></p>
<p>4) To <i>receive, review and approve</i> requests from parties (internal or external) for non-research purposes e.g., quality improvement, climate survey, other surveys, etc. The NWU-RDGC communicates with the parties involved.</p>	<p>4) To <i>receive, review and approve</i> all SoTL-related research from internal researchers, after it has served at a Scientific Committee. The REC is responsible for communication with the external researcher.</p> <p>To <i>receive, review and approve</i> all SoTL-related research from external researchers, referred to them by the NWU-RDGC. The REC is responsible for communication with the external researcher.</p> <p><i>*Should an REC receive a direct request from an external researcher, they should refer the researcher to the NWU-RDGC office administration as their first step.</i></p> <p><i>*The REC reports on a quarterly basis (template) to NWU-RDGC.</i></p>
<p>5) To be a final arbitrator on all matters related to gatekeeper issues, that could not be solved by existing processes for either internal or external researchers for research with existing NWU data related to staff, students, or systems/departments/laboratories (secondary data use), or</p>	

research involving NWU staff, students, or systems/departments/laboratories for the first time (primary research).	
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Note: Refer to flow diagrams of processes to be followed and the applicable reporting template.

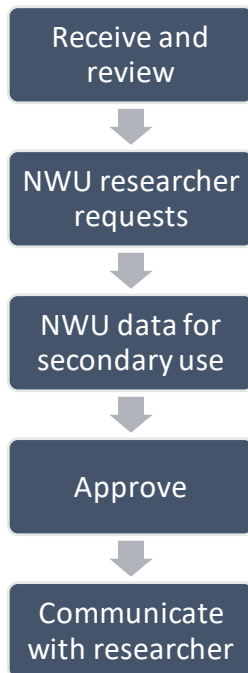
2.1 Definitions of related concepts

Concept	Description
Secondary data use	The use of NWU data (staff, students, or systems/departments/laboratories) originally gathered for other purposes than research, to be used for research purposes.
Additional research outcomes	Research over and above that of the originally planned outcome(s) of the research.
Primary research	Research involving NWU staff, students, or systems/departments/laboratories, from which research data is collected for the first time.
SoTL research	Research related to the Scholarship of Teaching and Learning.
Laboratory-related research	Research related to laboratory practices or data gathered from laboratories, for non-research purposes, to be used as research.
Non-research purposes	Requests related to the gathering of data for quality improvement, climate surveys, other surveys, etc.
NWU Data	Existing NWU data (staff, students, or systems/departments/laboratories) collected for purposes other than research.
External researchers	Researchers from outside institutions wanting to conduct research using NWU data for secondary data use or staff, students, or systems\departments\laboratories for primary research.
NWU researchers	Refers to staff and students of the North-West University
NWU-RDGC	North-West University Research Data Gatekeeper Committee.
NWU-RECs	North-West University Research Ethics Committees.

2.2 Flow diagrams for RDGC and RECs receiving, reviewing, and approving of research requests

2.2.1 RDGC related processes

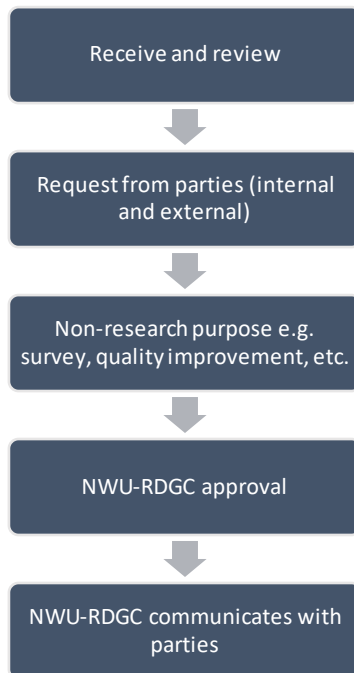
1) **NWU data for secondary data use by NWU researchers (after SC and REC review)**



2) **Research requests from external researchers for use of NWU data or research involving NWU staff/students/systems/departments/laboratories**

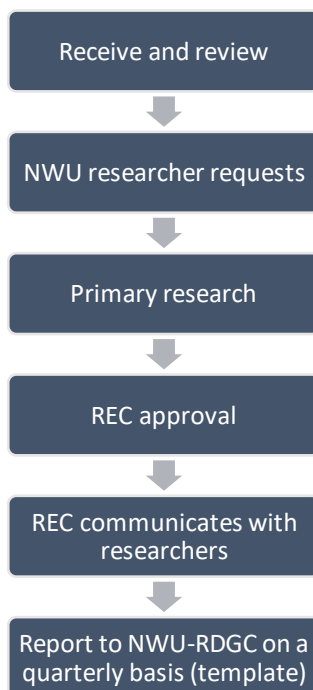
NWU data for secondary data use	NWU primary research
<p style="text-align: center;">Receive</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">External researcher requests</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">NWU data for secondary data use</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Refer to REC for research ethics review (expedited)</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">NWU-RDGC review as the gatekeeper</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">NWU-RDGC approval</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">NWU-RDGC communication with the researcher</p>	<p style="text-align: center;">Receive</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">External researcher requests</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">NWU primary research</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Refer to REC for research ethics review and approval (expedited)</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">REC approval</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">REC communication with researcher</p>

3) ***Request from other parties for non-research purposes***

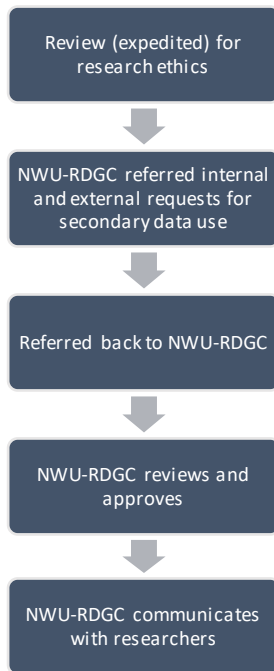


2.2.2 REC processes

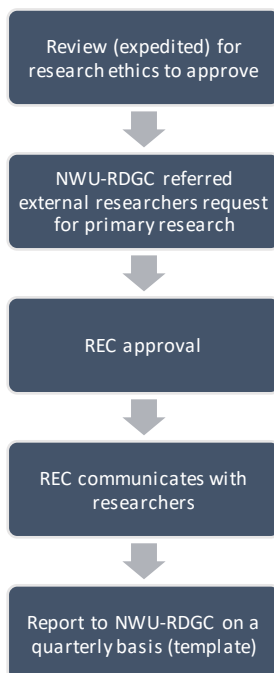
1) ***Requests for primary research by NWU researchers for research with NWU students, academics, or systems/departments/laboratories***



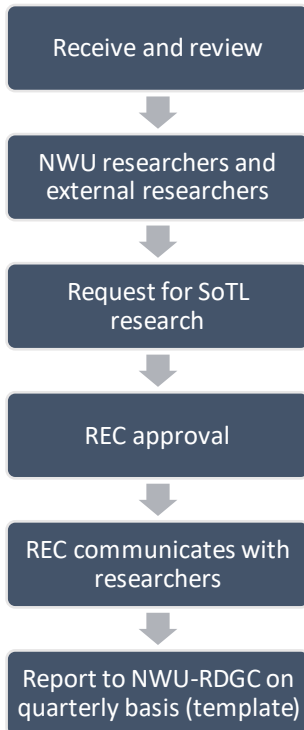
- 2) **Research referred by NWU-RDGC for research ethics review of internal researcher (already reviewed by a SC and REC, but still with questionable practices) or external requests received for secondary data use**



- 3) **Research referred by NWU-RDGC for research ethics review of external requests for primary research involving NWU students, academics, or systems/departments/laboratories**



4) Requests for SoTL research by NWU researchers (after SC review) or external researchers referred by the NWU-RDGC



3. RDGC-related context

3.1 Examples of NWU data requests

NWU staff data	NWU student data	NWU systems etc. data
Specific data on staff (not including identifying information).	Student assessment results: <ul style="list-style-type: none"> • Tests. • Examinations. • Assignments. • Portfolios. • Presentations. Student enrolment and registration figures. Academic records. Specific data on students (not including identifying information).	Data on the PDFs NWU has hosted. TTIS file information: <ul style="list-style-type: none"> • Seed fund applications. • Project quarterly reports. • Project close-out reports. Data as per the InfoEd system of the NWU: <ul style="list-style-type: none"> • Subsidy claims. • Research outputs to DHET. NWU social media data e.g., Facebook. Data in the Alumni office. NWU systems: <ul style="list-style-type: none"> • eFundi. • InfoEd.

		<ul style="list-style-type: none"> The VSS system (mark capturing) etc.
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3.2 Parameters for use by NWU-RDGC for the review of requests for NWU data of staff, students, or systems/departments/laboratories

3.2.1 Data for which access will not be granted:

- 1) Direct access to e-mails (however, in studies of national interest, a process of facilitation could be negotiated).
- 2) Any personal information of students, academics and/or support staff.
- 3) Staff performance agreements, employee assistance program (EAP) or other private People and Culture processes.
- 4) Any detail on student, academic or support staff disciplinary processes.
- 5) Any detail on undergraduate students, postgraduate students, or academic's teaching-learning or research integrity processes.
- 6) Any detail on research ethics approval processes.
- 7) Any detail regarding promotional processes.

3.2.2 Anonymization of data

All data provided will be in an anonymized format (de-identified as per POPIA requirements).

3.3 Risk level descriptors of NWU data

Minimal risk	Medium risk	High risk
<p>Definition: All NWU data comparable to data that would be gathered during activities of "daily academic life", with only minimal foreseeable risk in the use thereof.</p>	<p>Definition: All NWU data where there is some form of evaluation or private information that if appropriate steps are taken to mitigate or reduce the overall risk, e.g. de-identification, it will only lead to a potential medium foreseeable risk in the use thereof. Remedial interventions could be undertaken should harm occur.</p>	<p>Definition: All NWU data that where there is some form of evaluation or private information, that if de-identified and mitigating factors are clearly identified. could still lead to a potential risk in the use thereof. Should remedial interventions be undertaken it would not reduce the harm that could occur.</p>
<p>Examples:</p> <ul style="list-style-type: none"> Student numbers per qualification. Student enrolment and registration figures. Student throughput rates. eFundi usage statistics. Any NWU data available to the public. 	<p>Examples:</p> <ul style="list-style-type: none"> Anonymized student academic records. Anonymized student assessment data. Internal evaluation processes of quality improvement. Surveys on university climate studies etc. eFundi content related to evaluation or assessment 	<p>Examples:</p> <ul style="list-style-type: none"> Data allowing comparison between universities where the outcome of the data analysis is linked to a specific department/faculty/university, etc. Any data where the university per se will be identified as institution. TTIS file information.

	<p>e.g., lecturer evaluations, outcomes of online tests or assignments etc.</p> <ul style="list-style-type: none"> • Data as per InfoEd system of the NWU. • NWU social media data. 	
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4. REC-related context

4.1 Examples of NWU staff, student, systems requests

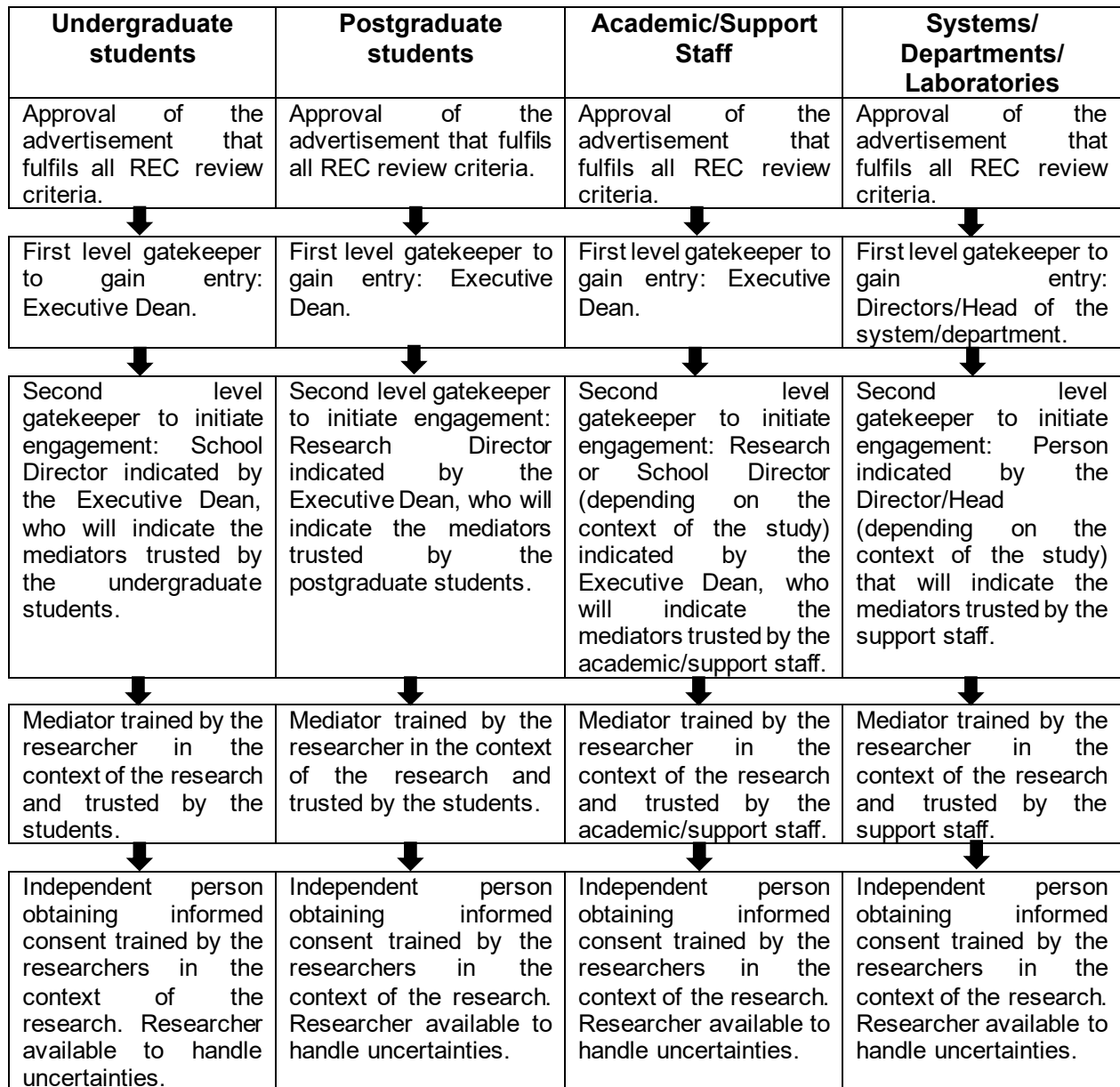
NWU staff	NWU students	NWU systems etc.
<p>Human Resources policies and procedure documents:</p> <ul style="list-style-type: none"> • Recruitment and selection process. • Performance management. • Remuneration and benefits. • Leave. 	<p>Student course materials:</p> <ul style="list-style-type: none"> • Syllabus. • Study guide. • Prescribed resource material. • Textbooks. • Online materials. • Tests. • Examination papers. <p>Strategic plans and annual reports related to students.</p> <p>Curriculum content of specific groups.</p> <p>Selection processes of specific students.</p>	<p>NWU employment equity plan.</p> <p>NWU strategic plan.</p> <p>Policies on Human Resources.</p>

4.2 Guidelines for protecting the potential vulnerability when involving NWU students in research

- 1) The opportunity for power relationships should always be prevented.
- 2) No student is to be used due to them being conveniently accessible i.e., convenience sampling.
- 3) At no stage may any student be exposed to the potential of victimization, power relationships, coercion and/or undue influence.
- 4) The purpose of studying students should always be due to the potential benefit of being a student, e.g. to improve teaching-learning outcomes, etc.
- 5) Under no circumstances is the use of remuneration or potential benefit, e.g. mark increase, to be used to recruit students for research participation.
- 6) When working with data in the lecturer's possession, all scientific committee and research ethics committee processes for approval should be followed.
- 7) Students, more so than usual, should always be fully informed of the purpose and nature of the study and have the ability to make a choice without running the risk of being exploited.

- 8) At no point should the lecturer be the person obtaining informed consent from their own students, in their own studies.
- 9) In no way is the nature of the data gathered from the students allowed to expose the student to any potential harm.
- 10) At no stage, may data be gathered through a process, where students are exposed to being a “captured audience”.
- 11) At no point should the lecturers be the person to gather data from their own students, for their own studies, i.e. they should always have a second party gathering the data.
- 12) No data gathering should at any time impose on teaching-learning activities.

4.3 Flow diagram for RECS on the process to be followed by researchers in gaining entry, engaging with the specific research communities, and obtaining informed consent from participants



4.4 REC review criteria for NWU advertisements

Criteria	Comments
Clear, visually appealing presentation.	
Only the approved NWU logo (no other logos unless with approved collaborative research).	
Details of research entity/School under which the study is being conducted.	
Only to use brief and clear statements, i.e. not cluttered content.	
Clear description of: a. The purpose of the research. b. The targeted population. c. The method(s) to be used for data gathering. d. The time required to collect the required data. e. Where data will be collected.	
Clear indication of the timeframe of study.	
Details of the contact person to approach, to become a participant.	
Contact details of the researcher.	
The REC that approved the study and the REC approval number.	

3.5 Template for RDGC quarterly reporting by RECs



Template for RDGC
Quarterly reporting b:

Approved at: The Senate Committee for Research Ethics (SCRE)

Date:

11 March 2024