

Faculty of Commerce Practice Note: Research Ethics Clearance Exemptions

UCT's Policy for the Responsible Conduct of Research (20/11/2020) includes:

2.7. Research involving secondary de-identified or coded data sets, where the researcher does not have access to identifying information; research on information in the public domain (if legally compliant with applicable privacy legislation) and observational research in public spaces where individuals do not have an expectation of privacy, generally does not require research ethics approval. However, some social media research has ethical implications that requires researchers to act responsibly and seek advice from a REC if necessary.

Given that much research in the Faculty of Commerce relies exclusively on such datasets, a practice note is required that defines research projects that can be considered exempted from both the pre-screening questionnaire (PSQ) as well as any further process of ethical approval in advance of research commencing.

Note generally that ethics review only applies to research involving, or involving data about, human or non-human animal subjects.

Secondary Data

Datasets obtained from the following sources are considered secondary data, and research relying exclusively on these datasets are exempted from ethics approval processes*:

- Any dataset carrying the [Data Seal of Approval](#)
- World Bank
- DataFirst
- SARB
- Bloomberg
- StatsSA
- IMF

(This is not an exhaustive list – please consult with your supervisor, Departmental Ethics Committee representative, or the Chair of the Commerce Ethics in Research Committee if you are unsure about whether your research project is exempt from ethical clearance procedures.)

*Even though formally exempted, researchers are encouraged to nevertheless apply, initially using the Pre-screening Questionnaire for the sake of prudence, and/or if their research or its future publication requires or might foreseeably require an approval number from the Ethics in Research Committee.

POPIA and other considerations

Note that “secondary data”, for the purposes of UCT and Commerce policies on research integrity, does *not* include data that are not publicly available, and/or where primary identifying data might easily be available to researchers, e.g. re-analysis of data provided to researchers by their supervisors. The term secondary data is, in summary, not shorthand for “data not collected by the researcher”.

Similarly, while implementation of POPIA requirements is still under discussion at the EiRC and elsewhere, the provisions of POPIA apply *unless* all data that “can be linked by a reasonably foreseeable method to other information that identifies the data subject” has been deleted.

Jacques Rousseau

Chair: Commerce Ethics in Research Committee
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