

**POPIA SELF-ASSESSMENT**

Document type: Template

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# Introduction to the POPIA self-assessment

If your research data contains identifiable personal information of living individuals or existing organisations you must tread carefully, because you are subject to the Protection of Personal Information Act 4 of 2013 or other privacy regulations. Non-compliance comes with serious fines and can damage your reputation as well as the reputation of the University.

Personal information means any information relating to an identifiable living individual (not deceased) or an existing organisation (a company, public body, university, etc.). This includes the personal information of research participants, members of the public, or other individuals or organisations.

You should answer 'Yes':

* even if the personal information you collect will be anonymised later;
* whether you are collecting the personal information directly from the research participant; or
* whether you are collecting the personal information indirectly about the research participant (e.g., analysing their social media or medical records or reusing personal information which was collected as part of a previous research project)

You will be asked to upload this self-assessment on the [PeopleSoft Ethics Application and Approval System](https://upnet.up.ac.za/ethics/).

Access the POPIA Self-Assessment online tool [**here**](https://docs.google.com/forms/d/e/1FAIpQLSd7wFzPvB3aaz_2sBaqjiQcsNRvyvN15K3rItDRPB4vEoZT_A/viewform?usp=sf_link).

**Want to access the full Research Proposal and Approval Guideline?**

Access the Guideline online tool [**here**](https://www.up.ac.za/research-resources/article/3181860/research-proposal-and-approval-guideline).

**You need to complete Data Management Plan**

If you are collecting identifiable personal information in your research, you must also submit a data management plan.

Access the DMP online tool [**here**](https://docs.google.com/forms/d/e/1FAIpQLSfxoI1MHC4m3WkhxfNjWZFNepckLt6EvDdhaFT8kYSeVkJPvQ/viewform?usp=sf_link).

Access the MS Word DMP template **here**.

# Information that must appear on the cover page of your POPIA Self-Assessment

## Full name

## The name of your project or title of your thesis

## Your EMPLID

If you do not have an EMPLID you must obtain a sponsored guest ID from the Market Research Office by [insert procedure].

## The faculty or professional services department you are in

## The type of project

Select only one.

* Research as part of an academic programme at UP (If you selected this option, please go to question 5.1.)
* Research as part of an academic programme at another higher education institution (If you selected this option, please to go question 5.2.)
* Research for non-academic purposes at UP (e.g., academic article, conference paper, book) (If you selected this option, please go to question 5.3.)
* Research for non-academic purposes at another higher education institution (e.g., academic article, conference paper, book) (If you selected this option, please go to question 5.4.)
* Commercial research (i.e., research that has clear commercial intent and focus and that is funded or commissioned by an outside organisation or researcher) (If you selected this option, please go to question 5.5.)

### Your academic programme:

(After you have answered this question, please skip to question 6.)

### Your academic programme and name of other higher education institutions:

(After you have answered this question, please skip to question 6.)

### Your faculty or department:

(After you have answered this question, please skip to question 6.)

### Name of other higher education institution:

(After you have answered this question, please skip to question 6.)

### Name of funder:

(After you have answered this question, please skip to question 6.)

# Identify your team

## Identify your supervisor

Select only one.

* I am doing research as part of an academic programme and my faculty will appoint a supervisor.
* I am not doing my research as part of an academic programme.

## Identify the principal investigator

Select only one.

* I am the principal investigator. (If you selected this option, please go to question 7.2.)
* I am not the principle investigator. (If you selected this option, please go to question 7.1.)

### The principal investigator is:

**Important:** The principal investigator will be asked to make the following declaration [insert]

### Are other researchers working on your project?

Important: We will ask for the following information from each member of your research team:

* Title, initials and surname
* EMPLIDs
* Cell number and email address
* Relevant experience
* Academic qualifications
* Yes
* No

# What you are collecting

## Are you collecting the personal information of any individual or organisation?

**How to answer:** Personal information means any information relating to an identifiable living individual (not deceased) or an existing organisation (a company, public body, university, etc.). This includes the personal information of research participants, members of the public, or other individuals or organisations. You should answer 'Yes':

* even if the personal information you collect will be anonymised later;
* whether you are collecting the personal information directly from the research participant; or
* whether you are collecting the personal information indirectly about the research participant (e.g., analysing their social media or medical records or reusing personal information which was collected as part of a previous research project)

* Yes (If you selected this option, please read the “What to expect” block below.)
* No (If you selected this option, please read the “Important” block below.)

**What to expect:** If you are collecting the personal information of individuals or organisations you must complete this self-assessment and have a data management plan. This is a legal requirement of the Protection of Personal Information Act (POPIA) 4 of 2013 which came into force on 1 July 2020. This self-assessment is also designed to ensure that researchers comply with the draft POPIA Code of Conduct for Research.

You must also still apply for ethics approval on the [PeopleSoft Ethics Application and Approval System](https://upnet.up.ac.za/ethics/).

(After you have read the “What to expect”-block above, please skip to question 9.)

**Important:** Are you sure you are not using personal information? If you are using personal information, you must complete the self-assessment in the rest of this section to ensure that you and the University comply with the legal requirements of the Protection of Personal Information Act 4 of 2013 which came into force on 1 July 2020. This self-assessment is also designed to ensure that researchers comply with the draft POPIA Code of Conduct for Research. For more information on privacy in the research context, see the Research@UP Manual.

Here is the full definition of personal information in the University's Research Compliance Regulation:

"Personal information means any information relating to an identifiable individual (living or deceased) or an existing organisation (a company, public body, university, etc.). This includes the personal information of research participants, members of the public, or other individuals or organisations.

Examples include:

* identifiers such as a name, identity number, student number, staff number, account number, customer number, company registration number, tax number, photos, videos, or any other unique information that can be used to identify a person;
* demographic information such as race, gender, sex, pregnancy, marital status, national or ethnic or social origin, colour, sexual orientation, age, religion, conscience, belief, culture, language and birth;
* information relating to physical or mental health, well-being or disability;
* background information such as education, financial, employment, medical, criminal or credit history;
* contact details such as a physical and postal address, an email address, a telephone number, an online identifier (e.g., a person's Twitter handle) or location information;
* biometric information: this refers to techniques of identification that are based on physical, physiological, or behavioural characterisation such as blood-typing, fingerprinting, DNA analysis, retinal scanning, and voice recognition;
* someone's opinions, views, and preferences;
* private or confidential correspondence and any further correspondence that would reveal the contents of the original correspondence;
* views or opinions about a person, such as interview notes and trade references; and
* the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence, or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings."

## Is it possible to collect the information anonymously instead?

**How to answer:** The only way to avoid having to comply with POPIA is to collect anonymous information. Anonymous means that you cannot identify who the individuals or organisations are. If you are only going to anonymise the personal information later or if you are going to mask the identity of participants, you should answer 'No' to this question and your research will be subject to POPIA.

* Yes (If you selected this option, please read the “Important” block below.)
* No (If you selected this option, please go to question 9.1.)

**Important:** Are you sure you are collecting the personal information anonymously? The legal term for this is 'de-identified' personal information. It means that you must not have any personal information that directly or indirectly identifies the participant, that can be manipulated to identify the participant, or that can be linked with other information that will identify the participant. If you are unsure, it is better to assume that the information is identifiable and that you must comply with POPIA.

Biometric information (including genetic data) is considered identifiable if it is linked through specific technical processing to other personal information that can directly or indirectly identify a living individual.

**Important:** Are you sure you need to know who the research data belongs to? This is the first question that the Information Regulator is going to ask if something goes wrong. If you can collect the personal information anonymously, you don't have to worry about POPIA at all.

(After you have read the “Important”-block above, please skip to question 10.)

### Explain why you cannot collect the information anonymously

# Complete the inherent privacy-risk assessment

**Define it:** If you answer 'Yes' to any of these questions your research carries a high privacy risk.

**What to expect if your research is high risk**: If your research carries a high privacy risk, you have an increased ethical and legal responsibility to ensure the privacy of the individuals or organisations whose personal information you are collecting and using. The research ethics committee reviewing your application will pay special attention to whether you have minimised the privacy risk to your data subject.

The Research Data Management Committee may ask to perform a spot check to ensure that you have performed this self-assessment, and that you have implemented your data management plan (as approved).

## Will the research participants include children?

**Define it:** For purposes of this question, a child is anybody under the age of 18.

* Yes
* No

## Will you be collecting any of the following types of special personal information?

**Define it:** POPIA created the concept of special personal information. Special personal information is considered sensitive from a privacy perspective. Any personal information concerning (directly or indirectly) the following types of personal information carry a high privacy risk.

* Religious and philosophical beliefs.

**Define it:** Information relating to membership of a specific religion, holding a belief central to a religion, or holding a belief about a weighty and substantial aspect of human life or behaviour. Examples of this type of information include beliefs such as ethical veganism, the use of cannabis (as a central tenet of Rastafarianism), dietary or dress requirements that are central to religious practice, views on climate change, or views on vaccinations. (If you selected this option, please go to question 12.)

* Race or ethnic origin.

**Define it:** Information about race or ethnic origin can be about a person's skin colour or other physical, social and biological attributes, shared cultural practices, perspectives and distinctions that set one group of people apart from another. It includes characteristics such as ancestry, territorial possession, language, forms of dress, sense of history, or religion. (If you selected this option, please go to question 12.)

* Trade union membership (If you selected this option, please go to question 12.)
* Political persuasion.

**Define it:** A belief or set of beliefs in relation to government or public affairs. In other words, a political opinion. This would include a person's membership to a political party, a person's voting record, whether they have ever had an interaction with a political party, and political views expressed on social media. (If you selected this option, please go to question 12.)

* Health or sex life.

**Define it:** Health information includes personal information relating to the past, current, or future physical or mental health of a person, including the provision of healthcare service or information which reveals information about a person's health status. It would include any information on 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 fitness trackers, information collected from the individual when they register for health services or access treatment, any appointment details, reminders, and invoices which tell you something about the health status of the person. Information about a person's sex life includes information about sexual activity, relationships, sexual orientation, or sexual proclivities.

**Important:** The definition of health research adopted by the Faculty of Health Sciences Research Ethics Committee to determine which research they have to approve is narrower than the definition of health-related personal information in POPIA. In other words, your research may have a high privacy risk because you are making use of health information, but you do not need approval by the Faculty of Health Sciences Research Ethics Committee. (If you selected this option, please go to question 12.)

* Biometric information.

**Define it:** Biometrics is the technique of identifying a person based on physical, physiological, or behavioural characteristics, including blood typing, fingerprinting, DNA/RNA analysis, retinal scanning, and voice recognition. Biometric information is 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 and genetic data when it is linked with other personal information to identify a data subject. (If you selected this option, please go to question 12.)

* Criminal behaviour.

**Define it:** Criminal behaviour means the behaviour of a research participant relating to the alleged commission of an offence or proceedings relating to an alleged offence. Criminal convictions are not special personal information. (If you selected this option, please go to question 12.)

* I am not collecting special personal information. (If you selected this option, please read the “Important” block below.)

**Important:** Are you sure that you are not collecting special personal information? It is important that the University accurately identifies research that carries a high privacy risk, to ensure that you and the University meet your ethical and legal obligations. When in doubt, rather assume that you are using special personal information.

## Are you processing personal information on a large scale?

**How to answer:** The University considers processing to be on a large scale if:

* more than 100 research participants are involved;
* more than 50% of a certain group is involved;
* a large volume of personal information about an individual will be collected (even if there are less than 100 research participants); and
* the collection of personal information will take place over a period longer than 5 years.
* Yes
* No

## Are you making automated decisions that will have a significant effect on the research participants?

**How to answer:** This includes research that uses profiling and predictive analysis (e.g., cardiovascular disease risk calculators) to make an automated decision about the research participant that will have a significant effect on the research participant. A decision is automated if there is no human involvement in the decision. A significant effect is when the automated decision will affect the research participant's circumstances, behaviour, or choices. The automated decision might affect the participant's financial status, health, reputation, access to services or other economic or social opportunities. If the automated decision is trivial or hypothetical and has no real effect, the answer to the question should be 'No'.

* Yes
* No

## Are you collecting personal information from sources other than the research participants themselves?

**How to answer:** We asked a similar question in the data management plan section about research data in general. Here we are interested in whether you are collecting identifiable personal information from sources other than the individual or organisation themselves.

**Important:** If you are collecting personal information from sources other than the research participant themselves, a public record or a record that the research participant made public themselves, you must either:

* obtain informed consent (including consent to collect the personal information from another source); or
* notify the research participant and give them an opportunity to object.

Also remember that when you are collecting research data from another source, you may need permission from the curator of that source. For instance, if you are collecting (or scraping) personal information from the internet or social media you need to check whether you are allowed to do it under the terms & conditions of the website or social media platform.

Select only one.

* Yes, I am collecting personal information from a public record administrated by a public body. (If you selected this option, please go to question 15.)
* Yes, but the research participant deliberately made this personal information public. (If you selected this option, please go to question 15.)
* Yes, I am collecting the personal information from another source. (If you selected this option, please go to question 14.1.)
* No, I am only collecting personal information directly from the research participant. (If you selected this option, please go to question 15.)

### Describe the source

**Important:** If you are collecting personal information from sources other than the research participant themselves, a public record, or a record that the research participant made public themselves, you must either:

* obtain informed consent (including consent to collect the personal information from another source); or
* notify the research participant and give them an opportunity to object to the collection of personal information from other sources.

Also remember that when you are collecting research data from another source, you may need permission from the curator of that source. For instance, if you are collecting (or scraping) personal information from the internet or social media you must check whether you are allowed to do it under the terms and conditions of the particular websites or social media platforms.

## Will identifiable personal information be disclosed to third parties?

**How to answer:** We asked a similar question in the data management plan section about research data in general. Here we are interested in whether you are sharing identifiable personal information with individuals or organisations outside the University (third parties).

**What to expect:** If you are sharing identifiable personal information with third parties, the University must make sure that the appropriate contracts are in place, because it is a legal requirement.

* Yes (If you selected this option, please read the “If you are sharing identifiable personal information…” block below.)
* No (If you selected this option, please read the “Important” block below.)

**Important:** Are you sure you are not sharing identifiable personal information with third parties? For instance, if you are using a cloud storage provider to store your research data, you are sharing personal information. This is not a problem, as long as the University has an agreement in place with that cloud storage provider and the Unit for Academic IT has conducted a security risk assessment.

(After you have read the “Important”-block above, please skip to question 16.)

If you are sharing identifiable personal information with third parties, the University has to make sure that the appropriate contracts are in place, because it is a legal requirement. The Unit for Academic IT also has to conduct a security risk assessment.

For assistance with the security risk assessment, contact the Unit for Academic IT at eresearchstorage@up.ac.za. To find out if the University has an agreement with the third party, contact the Innovation and Contracts Management Office at icm@up.ac.za.

## Are any people or organisations that will have access to the personal information located in another country?

**How to answer:** Answer 'Yes' if the personal information will be transmitted to people or organisations that are in another country, or if they are given remote access to the personal information.

* Yes (If you selected this option, please read the “What to expect” block below.)
* No (If you selected this option, please go to question 17.)

**What to expect:** If you are sharing identifiable personal information with third parties, the University must make sure that the appropriate laws, contracts, or other binding rules are in place, because it is a legal requirement. Contact the Innovation and Contracts Management Office for assistance at icm@up.ac.za.

## Will unique identifiers be used to link, combine, compare, or match personal information from multiple sources?

**How to answer:** Different sets of personal information held by other organisations or persons are linked by using unique identifiers to form a new dataset. A unique identifier is a code or number that an organisation uses to identify a research participant. This would include an ID number, participant identification number, sample code, requisition number, or another reference number that identifies a research participant.

* Yes (If you selected this option, please read the “What to expect” block below.)
* No (If you selected this option, please go to question 18.)

**What to expect:** The reuse of identifiable research data should be approved by a research ethics committee to ensure that the appropriate consents are obtained from research participants. You must also conclude a data sharing agreement and a material transfer agreement. Contact the Innovation and Contracts Management Office for assistance at icm@up.ac.za.

## Does the research involve the use of new technology that is, or might be, perceived by individuals as intrusive on their privacy?

**How to answer:** Examples include artificial intelligence, machine learning, deep learning, smart or wearable technology, neuro-measurement (emotional response analysis and brain activity measurement), tracking technology, or the use of biometric information.

* Yes (If you selected this option, please read the “What to expect” block below.)
* No (If you selected this option, please go to question 19.)

**What to expect:** If the use of this technology also involves sharing personal information with third parties, the Unit for Academic IT must do a risk assessment and the University must have a contract with that third party. Contact the Unit for Academic IT at eresearchstorage@up.ac.za for assistance with the risk assessment and contact the Innovation and Contracts Management Office at for assistance about a contract with the third party.

## Would the processing of personal information contemplated by the researchers be outside of the reasonable expectations of individuals?

**How to answer:** Will research participants be surprised or find it invasive to learn what their personal information will be used for, or how it will be used? This is typically the case where the research participant was disclosing the personal information for a different purpose and was unaware that it will also be used for research.

* Yes
* No

## Will the research involve contacting or interacting with individuals in ways that they might find intrusive?

**How to answer:** Examples of this will include where personal information is collected by systematically monitoring the research participants in publicly accessible places without their knowledge.

* Yes
* No

## Will you be pseudonymising the personal information?

**Define it:** Pseudonymisation means that personal information is used in such a way that the personal information can no longer be attributed to a specific individual or organisation without the use of additional information, provided that the additional information is kept separately, confidential, and secure from unauthorised access.

**Important:** All high-risk research must be pseudonymised as soon as possible after collection. If you cannot pseudonymise the personal information, you must contact the Research Data Management Committee at resdatacom@up.ac.za for advice on how to ensure that your research is legal.

* Yes (If you selected this option, please go to question 22.)
* No (If you selected this option, please go to question 22.)
* I don't know how to pseudonymise personal information. (If you selected this option, please read the “How to pseudonymise personal information” block below.)

**How to pseudonymise personal information:** You can pseudonymise personal information by encrypting identifiers or by creating a pseudonym (e.g., an identifying number or code) for research participants so only researchers with the decryption key can re-identify the information. The decryption key or list of pseudonyms is kept secret and secure. For technical advice contact the Research Data Management Committee at resdatacom@up.ac.za.

## **Are you sure that it is necessary to collect all of the personal information?**

**Important:** You must collect the least amount of personal information possible to achieve the purpose of your research. You should justify why you needed each piece of personal information you collected in your research proposal.

* Yes
* No

## Is there a less intrusive way to conduct your research?

**Important:** You must always consider whether there is a less intrusive way to conduct your research. For instance, is it possible to collect the research data anonymously or to mask the identify of research participants? This is why pseudonymisation is required when your research is high risk from a privacy perspective.

* Yes
* No

# Determine whether your research is legal

## Will you be asking for informed consent?

**Define it:** Most research involving identifiable personal information will require informed consent from the research participants. This is an ethical requirement that pre-dates POPIA. Consent is not required in terms of POPIA, but if it is possible to also obtain consent to use personal information, you should. If you cannot obtain consent, there are other ways to ensure that your research is legal from a POPIA perspective.

* Yes (If you selected this option, please read the “Important” block below.)
* No (If you selected this option, please go to question 25.)

**Important:** You must use the template prescribed by the relevant research ethics committee. In addition, you must ensure that the consent describes what personal information will be collected, how it will be collected (including the source), how it will be processed, whom it will be shared with in an identifiable form, and whether it will be published in an identifiable form. A blanket consent to 'Use your personal information for research' is not sufficient.

Consent should never be bundled with other activities. It must be possible to say no, but to still continue with the other activities. For instance, participating in research cannot be one of the conditions to enter into a competition or to receive medical treatment.

## Is it impossible, or would it require a disproportionate effort, to get informed consent? Explain why.

**Important:** Are you sure you cannot ask for consent? Note that different ethics committees have different requirements for consent waivers. You will also have to meet the additional requirements in terms of POPIA.

If you answer 'No' to the questions in the rest of this section, it will mean that you do not meet the necessary requirements and that your research is illegal!

## Will research participants have an opportunity to object to their personal information being used in your research?

**Important:** If you are not in a position to ask for consent, you should try to notify research participants that their personal information will be used in research and allow them an opportunity to object. Where it is not possible to communicate with the research participants personally, you should explore alternative options, such as putting a notification on social media.

* Yes (If you selected this option, please go to question 27.)
* No (If you selected this option, please go to question 26.1.)

### Is it impossible, or would it require a disproportionate effort, to give research participants an opportunity to object?

**Important:** If you are not in a position to provide researchers with an opportunity to object to the use of their personal information, you should approach the Research Data Management Committee for advice on whether your research is legal.

## Are you using any special personal information?

**How to answer this question:** You have already answered this question in the privacy-risk assessment. If you are processing special personal information, additional requirements apply for your research to be legal if you do not have an informed consent.

* Yes (If you selected this option, please go to question 27.1.)
* No (If you selected this option, please go to question 28.)

### Has the special personal information in question been deliberately made public by the research participant?

**How to answer this question:** Examples are where a research participant deliberately made personal information public on social media (as long at their profile is set up that everybody can view the personal information) or a personal website. For instance, for the answer to be 'Yes', it has to be the research participant who published the personal information and not their employer.

* Yes (If you selected this option, please go to question 28.)
* No (If you selected this option, please go to question 27.2.)

### Is the research for which the personal information will be reused in the public interest?

**How to answer this question:** Research is in the 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). To answer this question, consider the following questions:

* Why do you want to process the personal information?
* What benefit do you expect to get? What benefit will others get?
* How important are those benefits?
* What will the impact be if you cannot go ahead?

* Yes (If you selected this option, please go to question 28.)
* No (If you selected this option, please read the “Important” block below.)

**Important:** If research using special personal information is not in the public interest, you may have to ask for specific consent from the research participant or you will have to anonymise the personal information fully and permanently. Please approach the Research Data Management Committee for further legal advice at resdatacom@up.ac.za.

## Are you using any of the following techniques to protect the privacy of research participants

Select only one.

* Pseudonymisation (If you selected this option, please go to question 29.)
* Encryption (If you selected this option, please go to question 29.)
* Other strict access controls (If you selected this option, please go to question 29.)
* None of the above (If you selected this option, please read the “Important” block below.)
* Other: (If you selected this option, please go to question 29.)

**Important:** If your research is inherently high risk from a privacy perspective and you cannot pseudonymise, encrypt, or strictly control access to the personal information, you should contact the Research Data Management Committee at resdatacom@up.ac.za for advice on how to ensure that your research is legal.

## Are you reusing identifiable personal information for your research?

**How to answer:** Answer 'Yes' if you are making identifiable personal information available to other researchers for further research. If you are only making de-identified (fully and permanently anonymised) personal information available, you should answer 'No'.

* Yes (If you selected this option, please read the “Important” block below.)
* No (If you selected this option, please go to question 30.)

**Important:** The reuse of identifiable research data should be approved by a research ethics committee to ensure that the appropriate consents are obtained from research participants. You must also conclude a data sharing agreement and a material transfer agreement with the research participants. For assistance with these agreements, contact the Innovation and Contracts Management Office at icm@up.ac.za.

### Did the research participant give you informed consent for the reuse of their personal information?

**How to answer this question:** If you are relying on broad consent you should answer 'No' even if the research ethics committee approved the use of broad consent. This is not necessarily a problem, there are other ways to justify the reuse of identifiable personal information in terms of POPIA.

* Yes
* No

## Will you publish the research data in an identifiable format?

* Yes (If you selected this option, please go to question 30.1.)
* No (If you selected this option, please go to question 31.)

### Explain why you must publish the research data in an identifiable format:

## Is it possible to ask for informed consent for the specific research that the personal information will be reused for?

* Yes (If you selected this option, please read the “Important” block below.)
* No (If you selected this option, please go to question 32.)

## State why the answer is 'No'.

**Important:** If you can ask for specific consent for the reuse of personal information in a particular research project, you should.

## Is the research for which the personal information will be re-used in the public interest?

**How to answer this question:** Research is in the public interest if the research process or outcome would widely and generally benefit the public at large or a group, community, or specific population (as opposed to a few individuals or a single entity). To answer this question, think about the following questions:

* Why do you want to process the personal information?
* What benefit do you expect to get? What benefit will others get?
* How important are those benefits?
* What will the impact be if you cannot go ahead with your research?
* Yes (If you selected this option, you have finished completing the template.)
* No (If you selected this option, please read the “Important” block below.)

**Important:** If the research for which the personal information will be re-used is not in the public interest, you may have to ask for specific consent from the research participant or you will have to anonymise the personal information fully and permanently. Please approach the Research Data Management Committee for further advice at resdatacom@up.ac.za.