

HREC (NON-MEDICAL) STATEMENT ON RETROSPECTIVE APPLICATIONS

February 2025

This memorandum serves to notify the Wits University Community that **the Human Research Ethics Committee (HREC) (Non-Medical) will no longer review any retrospective applications from staff members.**

As per the new NDoH NHREC 2024 Guidelines, the HREC (Non-Medical) may not grant retrospective ethics clearance for studies where researchers have already collected data from human participants without ethics clearance first being in place. This means that any project should be planned well in advance and ethics applications submitted timeously to avoid these issues. Collecting data from human participants without ethics clearance is highly unethical and directly contravenes University policies and the NDoH NHREC 2024 Guidelines. It also has implications for academic integrity. Such actions may lead to rejection of research papers by journals, impact on registration with professional bodies, affect funding or rating applications, delays in graduation, result in unintended consequences for participants, and damage the reputation of both the researcher and the University.

It is recommended that staff members think carefully about future academic and research activities and to have a plan in place for any future unexpected research outcomes. For example, if you think that certain teaching and learning activities may give rise to publishable data, please submit an ethics application in advance to cover this eventuality. If you are convening a workshop or discussing strategies with colleagues, think about how this discussion can be used to leverage research ideas and applications.

On a case-by-case basis, the HREC (Non-Medical) *may* consider retrospective applications from **students with compelling reason**, bearing in mind that in such instances the HREC (Non-Medical) is only able to provide retrospective *acknowledgment* and not full ethics clearance. If a student has intentionally collected data without ethics clearance, such a situation may warrant disciplinary action. Any retrospective applications by students must be submitted online to the main University HREC (Non-Medical) and cannot be considered by School-level Ethics Committees. The application must be accompanied by a cover letter from the student *and* the supervisor to provide a strong motivation for the retrospective application. Any retrospective acknowledgement that the HREC (Non-Medical) may issue only applies to past data collection and no further data may be collected after receipt of such an acknowledgement. If an applicant intends to collect new data after such an acknowledgement has been issued by the HREC (Non-Medical), a new full ethics application must be made.

If you find yourself in any of the above situations, please speak with the HREC (Non-Medical) so that a way forward can be found.

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