PETERBOROUGH CITY COUNCIL

RESEARCH GOVERNANCE FRAMEWORK

Application Pack

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Background

Peterborough City Council is keen to be a learning organisation. One way in which we can further this aim is by encouraging research as a valuable learning tool. However, we also have a duty of care to our service users, their families, carers and our staff who might be the subjects of any research to ensure that research is conducted to a high standard, in line with legal obligations. This is the purpose of the Research Governance Framework (RGF).

If you are thinking of doing research with Peterborough City Council, this framework will outline what you need to consider before you start.

Scope of framework

It is in everyone's interests to ensure that research is carried out to a high standard. All research and related activities should be well designed, well conducted and ethically sound.

Our definition of research and its coverage accords with the UK policy framework for health and social care research definition (2020):

"…the attempt to derive generalisable or transferable, new knowledge to answer or refine relevant questions with scientifically sound methods. This excludes audits of practice and service evaluations. It includes activities that are carried out in preparation for or as a consequence of the interventional part of the research, such as screening potential participants for eligibility, obtaining participants' consent and publishing results. It also includes non-interventional health and social care research (i.e. projects that do not involve any change in standard treatment, care or other services), projects that aim to generate hypotheses, methodological research and descriptive research. Projects whose primary purpose is educational to the researcher, either in obtaining an educational qualification or in otherwise acquiring research skills, but which also fall into the definition of research, are in scope."

Activities that meet the criteria above should not be misrepresented in order to avoid following the RGF process.

This framework covers all directorates within the council.

The RGF process

Before starting your research work, it is expected that you will have engaged with the service that oversees the work with the relevant client group and have gained their agreement to the proposed idea. If your research idea seems suitable and has been developed with the service, then you will need to obtain formal RGF approval and will have to:

- Prepare a Research Proposal, which should cover the areas outlined in the Research Proposal Guide **(see Page 8-11)**
- Complete an Application Form for submission to the RGF Co-ordinator

These must be submitted to the RGF Co-ordinator for the formal process of research approval to begin.

If you are undertaking research through a university or as part of the Diploma in Management Studies, your tutor or supervisor should be able to provide advice and support in preparing your research proposal.

If you decide to submit an application, it will need to go through a research approval process. The decision on whether to approve the application is based on a two-tiered system that is related to the risk involved, the vulnerability of the subject group and the skills, experience and expertise of the researcher **(See Page 6).** Note that you may be asked by the RGF Co-ordinator to provide more information, to help with the application.

Where a request is solely for circulating an opportunity for staff or service users to participate in qualitative research (e.g. a survey or interview), this does not need to go through the RGF process if the lead service contact has deemed it to be low risk. The lead service contact should notify the RGF coordinator where they have done this.

The RGF panel

The RGF panel is made up of:

- Head of BI, Peterborough (Chair)
- Caldicott Guardians for both adults and children
- Data Protection Officers
- Representative from legal services as required
- Lead service contact from the relevant PCC directorate that the research proposal falls under

If your application has addressed all the areas outlined in the research proposal guide and if it does not involve issues of high risk to participants (as set out on page 6 under level 2), it can be fast tracked and processed. In this case, the RGF Co-ordinator aims to provide a written letter of approval within 10 working days. However, if your application is more complex and potentially of higher risk, it will be referred to the RGF Approval Panel and we aim to give a decision within 20 working days.

Only when approval is given either by the RGF Co-ordinator or the RGF Approval Panel will you be able to commence. Arrangements will then be made for you to access participants or data as necessary. Your research will be logged on the Councils' Research Register and will be monitored quarterly by the RGF Co-ordinators or a named contact drawn from the RGF Approval Panel.

If you do not receive approval, you will be given reasons and information about how to re-submit or appeal against the decision. For re-submission, you will be given advice on how you might change your proposal to ensure it complies with the RGF's requirements. For Level 1 Research Proposal resubmission, we aim to give a decision within 10 working days. For Level 2 Research Proposal resubmission, the planned timescale is within 20 working days.

Who to contact to find out more?

Email: researchgovernance@peterborough.gov.uk

The role of Research Governance Framework Co-ordinator will be fulfilled by the Head of BI in Peterborough City Council.

The lead service contact will also be kept updated with research applications in their area.

The Two – Tiered System of Research

In Peterborough, we adopt a two-tiered system to assist us in the screening of research proposals. The allocation of the level is related to the potential risk involved, the vulnerability of the subject group and the skills, experience and expertise of the researcher. If your project meets any of the level 2 criteria then it will automatically be considered a level 2 project.

For **Level 1** Research proposal, the likelihood of harm to participants is considered to be low because:

- Where the research involves direct interaction with human subjects, participants are able to give informed consent and it is fully possible for them to withdraw from study.

- Researcher(s) are well qualified with experience and knowledge of all three of the following factors – topic of investigation, the participants/subjects and the methods to be used, e.g. formal research training and/or qualification and/or experience and knowledge gained from working in an appropriate environment.

- The topic and kinds of information being sought do not focus on personal information at all, e.g. opinions about services received; or the proposed topic is not deemed to be a sensitive one where distress may be caused to participants.

- The methods are fully appropriate to the subject of the proposed study and to the research questions being asked, there is a demonstrable need for the study and the resources to carry out the study are sufficient.

- There is no direct interaction between researchers and vulnerable clients.

- The identities of participants are kept confidential and anonymous.

For **Level 2** research proposal, the likelihood of harm to participants is considered to be high because:

- Informed consent & ability to withdraw from study not possible or unlikely due to age of child or incapacity of adult. There may also be communication issues arising from language or literacy issues, sensory or speech impairments.

- Researcher(s) are not well qualified with little or no experience or knowledge of either the topic of investigation, the participants or the methods to be used. Researcher working directly with service users or with case identifiable data has no DBS clearance.

- The topic and kinds of information being sought are likely to be regarded as highly personal or sensitive by those from whom it is being collected or about whom it is to be obtained, e.g. criminal records, health information etc.

- The methods are neither appropriate to the subject of the proposed study or the research questions being asked, the need for the study is not established nor the project does not have the resources to properly address the research question(s).

- There are high levels of direct contact and/or interaction between researcher and vulnerable clients, e.g. participant observation or observation study.

- The researcher personally knows the subjects/participants, or the researcher may have other duties or responsibilities towards all or some of the research participants, all of which may create potential conflicts of interest.

- The research is being conducted on behalf of a commercial sponsor.

- It is not clear that the research has been through a formal ethical approval process.

Please note, researchers who are employed by PCC should not directly conduct research with clients to whom they have a current professional relationship.

Research Proposal Guide

How you write your proposal is up to you but if you can address the criteria in this guide it will help the RGF Co-ordinator or the RGF Approval Panel to make a judgement about your research proposal. If you can answer as many of the questions as possible, it will simplify and quicken the approval process. If this information is already included in other documentation, such as your ethical approval documentation, please feel free to submit this.

Questions to address in your research proposal are:

1. Background	• What do you want to find out? • What is the main question you wish to answer? • What are the specific questions you will ask to address the main question? • Why is this research important? • What other studies have there been in this area? • How will this research add to knowledge in this area? • For research relating to adult social care, have you approached the Association of Directors of Adult Social Services (ADASS) for their endorsement of your research? https://www.adass.org.uk/research • For research relating to children's services, have you approached the Association of Directors of Children's Services (ADCS) for their endorsement of your research? http://adcs.org.uk/general/research

2. Roles and responsibilities	• Will you be doing this research on your own or with others? • Who is the chief investigator? • Have you provided full details of anyone else in your research team, including fieldworkers, along with their roles and responsibilities? • How is your research being funded? • Who is the research sponsor?
3. How you will do your research?	• Who are you targeting in this research? • How many people or case files do you intend to interview or read through? • Where will the research take place? • Will you need to consent participants for the study? If so, how will you do this? • What will your process be to assess whether participants have capacity to consent to be part of the study, and what will your process be if participants cannot consent for themselves? • Do you have an information sheet and a consent form for participants? • If you are using secondary data, how will this data be accessed? What data sharing arrangements will you need? • Supervisory arrangements - how do you intend your research to be supervised and monitored and by whom?
4. Timetable	• When will your research start and finish? • Are there particular stages to the research - e.g. piloting, then main research? If so, what are they? • Is the timetable realistic?

	• Is it influenced by external constraints or deadlines? • How will you provide regular updates and progress reports and to whom will you provide them?
5. Methodology	• What sort of data will you be collecting - e.g. are you intending to count numbers, talk to people directly or a mixture of the two? • What is the main method you will use to carry out the research - e.g. questionnaire, direct interviews, focus groups, paper reviews etc.? • How will you select your sample? • How will you recruit your sample? • How will you collect your data? • Will you be paying participants?
6. Ethical Issues	• Do you have ethical approval already from another organisation? If not, are you planning to gain approval from another organisation? • Is there any potential risk or harm to participants or yourself? • If so, what are the potential risks and what do you intend to do to reduce them? • How will your research comply with the Equality Act? • How will participants be given the opportunity to complain or raise issues about the service you are conducting the research on? How do you ensure they are being followed up? • Are you insured against professional negligence claims? • How will you deal with complaints made against you by participants? • How will you deal with any sensitive or criminal matters that may be raised in the course of your research? • What follow-up support will be available to participants should they require it? • What will you do if the focus of your research project shifts or changes substantially from the

	proposal? If it goes outside the original remit, how will you notify the council? You may need new approval.
7. Data protection	• Will you need consent? • Have you got a method of recording consent? • Where will the data be stored? • Have you undertaken a Data Protection Impact Assessment? • Will you be using recording or video equipment? • How will you make sense of or analyse the data? • How will the data be stored? • For how long will the data be stored? • How will it be disposed of?
8. Dissemination	• How will you ensure confidentiality and anonymity of data? • Who will have ultimate ownership of the data? • If you are likely to need to contact a participant later, you need to declare this now. • In what form will your findings be presented? - E.g. report, presentation, journal etc. • How will you be disseminating your findings? • To whom will you be disseminating your findings? • How will you ensure anonymity in any publications? • To whom does the research belong and have you thought about intellectual property rights? • It is a condition of approval that the research will be logged on the council's database. The council would also like a summary to be made available for the council's website – would you be willing to provide this?

Data Protection/Freedom of Information Acts and Caldicott Guidance

Everyone involved in carrying out research or related activities needs to be aware of their responsibilities under the following:

- Data Protection Act 2018
- Freedom of Information Act 2000
- Role of Caldicott Guardians

Data Protection Act 2018

The purpose of the Data Protection Act (DPA) is to protect the rights of individuals by ensuring the ways in which data is obtained, stored, processed, shared by others etc. is strictly governed. Failure to comply could result in prosecution.

Personal data includes anything that can help identify a living individual, for example their name, address, car registration, National Insurance number, etc. Special categories of personal data includes information concerning racial/ethnic origin, political or religious beliefs, trade union membership, physical or mental health, details of sexual orientation. Whilst criminal convictions are not considered as such in the legislation, their sensitivity aligns with special category of data.

Although the DPA doesn't apply to the records of deceased individuals, the same level of respect for confidentiality should be afforded to the records of those who are deceased as is given to those who are living.

Any collection or use of personal data must comply with the seven data protection principles which are:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

You should demonstrate in your application how your proposal is compliant.

Freedom of Information Act 2000

The Freedom of Information Act (FoIA) gives a general right of access to all types of recorded information held by public authorities, including the NHS and local authorities. You should be aware that any information held by, or on behalf of, a public authority can be subject to a request and disclosed, subject to the potential application of exemptions set out in the Act in each individual case. This includes copies of email correspondence and any details around research projects.

Role of Caldicott Guardians

Caldicott Guardians are senior staff in the NHS and Social Services appointed to protect the personal information of service users. They were introduced following the Caldicott Review of Patient Identifiable Information (1997), which recommended that 'Guardians' of patient information should be created to safeguard and govern the uses made of confidential patient information within NHS settings. The Caldicott principles were subsequently adopted by local authorities. You should ensure that you show how your proposal fits with these principles.

Arrangements for Monitoring and Supervision

It is the responsibility of the researcher to identify an appropriately qualified and experienced supervisor who is able and willing to provide guidance, support and advice about the research. The researcher is also responsible for securing the supervisor's agreement to undertake this task. If the research is being done through or as part of a university course or Diploma in Management Studies, the research supervisor will probably be a member of the university's academic staff or personal tutor of the program.

If necessary, the RGF Approval Panel will also appoint a named person, usually an experienced manager, who will be the research link for each research project that has been approved. This nominated link manager's role is to facilitate access to research participants or data and to oversee and monitor the progress of the research. They are not responsible for providing support and advice about the research itself.

Once a research supervisor has been chosen by the researcher and approved, the researcher should also ensure that the supervisor is fully aware of their role and in particular of the need to:

- ensure that the researcher adheres to the principles, requirements and standards of good practice as set out in the RGF
- offer regular support and advice throughout the conduct of the study and to monitor progress of the research
- ensure that the researcher maintains regular contact with the nominated link manager responsible for overseeing the research on behalf of the Council
- bring to the RGF Coordinator or nominated link manager attention promptly of:
    a) any matter that affects the ability of the researcher to continue the research or of the supervisor to continue to provide supervision;
    b) any matter that may adversely affect the interests of the participants, their families or carers or of the Council and its staff;
    c) any changes to the research proposal that takes place in the course of conducting the study;
    d) any other matter that the supervisor considers relevant.

Glossary of Terms

Sponsor	An organisation taking primary responsibility for ensuring: ● designs of studies meet applicable standards ● arrangements are in place for appropriate conduct and reporting ● all necessary agreements are in place and documented Sponsors are usually (but do not have to be) main funders. Sponsors can be local authorities, universities, or research foundations
RGF Co-Ordinator	The Council Officer who is the official point of referral for all prospective research applicants.
RGF Approval Panel	The Council body responsible for considering research proposals involving direct or indirect access to service users, their families, friends and carers. Membership of the Panel comprises Principal Social Workers for adults and children's services, the Caldicott Guardian, and head of BI
Main or Principal Researchers	Individuals with overall responsibility for the design, conduct and reporting of research studies

Research Team	Researchers who, with main researchers, comprise the group of individuals conducting research studies – including field workers
Research Supervisor	Person responsible for the management of researchers and research projects
Nominated Link Officer	A named Council officer (usually an experienced manager) appointed to provide the link between the Council and researchers. A Nominated Link Officer's role is to facilitate access to research participants and oversee and monitor progress of research on behalf of the Council. They are not responsible for providing support and advice about research itself
Participants	Service Users, their relatives, carers and Council staff or contractors engaged by the Council who are subjects of research
Research Proposal	The written document that defines the research subject, methodology, timescale and plan showing how the research will be conducted. Proposals accompany application form and should address the criteria set out in the research proposal guide. The proposal must be approved along with the application, before any research can begin.

Intellectual Property Rights	Ownership of research usually resides with principal researchers, or members of research teams. Intellectual Property Rights of commissioned research (i.e. research funded by an external organisation or group) usually resides with the commissioning body, depending on the terms of the contract. Sponsorship of research does not usually confer Intellectual Property Rights on sponsors
Non-negligent harm	Whilst research should not harm participants, it can occasionally do so unintentionally, and decisions may need to be made about how to redress situations where researchers have moral, rather than legal, responsibilities to the consequences of research. 'Non-negligent harm' issues can be dealt with via Council complaints procedures, or other process in place before research starts.
Data Protection Act	Legislation which ensures the protection of confidential, personal, information about service users, their families and carers which local authorities and researchers must comply with.
Informed Consent	Researchers are responsible for ensuring that the interests of research participants are protected and respected. Research must not begin until participants have consented to participating in it. Participants should freely give their consent, in writing, based on a full understanding of the purpose of the research and what is required of them. Copies of consent forms should be provided with applications for approval.
Participant Information	Information sheets/leaflets containing the following minimum information :

Sheets	● what the research is about ● researcher's name and contact details ● how and why participants are selected ● how to withdraw from the research ● how to complain ● what information will be gathered ● what the information will be used for ● what will happen to the information – e.g., interview tapes, questionnaires, etc. – gathered after the research has been completed Information sheets/leaflets should be produced prior to the start of research, and given to all participants before seeking their agreement to take part in the research. Sheets/leaflets must be produced in the participants' own language and in formats accessible to people with disabilities (including Braille versions)