Gloucestershire County Council

Research Governance Framework

Gloucestershire COUNTY COUNCIL

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DOCUMENT INFORMATION

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Sources of good practice	NIHR SCPH Local Authority Research Governance Repository Cumberland County Council's Research Governance Framework Havering Council's Research Governance Framework North Yorkshire Council's Research Governance Framework
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SUMMARY

What is the purpose of this framework?

This framework sets out how GCC ensures that any research involving council resources (e.g., data, staff, settings, service providers, people drawing on GCC services) is carried out safely, ethically and legally and in line with council priorities. It explains:

The standards and requirements that all research must meet	The process for requesting and gaining approval to use council resources for research	Researchers and council's responsibilities during, and after research

Why is it important?

Local authorities are investing in research to inform decision-making, improve services, and attract external funding. To do this they need a consistent approach to governing and monitoring research to ensure that research activity is coordinated, any risks are managed, and benefits are fully and comprehensively realised.

This Research Governance Framework:

- **Delivers strategic value** by enabling staff to conduct and support research aligned with council priorities and attracts funding; positioning the council as a trusted research partner for universities and external organisations.
- **Provides legal and ethical assurance** by ensuring research involving council resources complies with data protection requirements, safeguarding responsibilities, and recognised ethical standards.
- **Supports workforce development** by building staff confidence, skills, and opportunities to engage in high-quality research and collaborations with academics and external organisations.

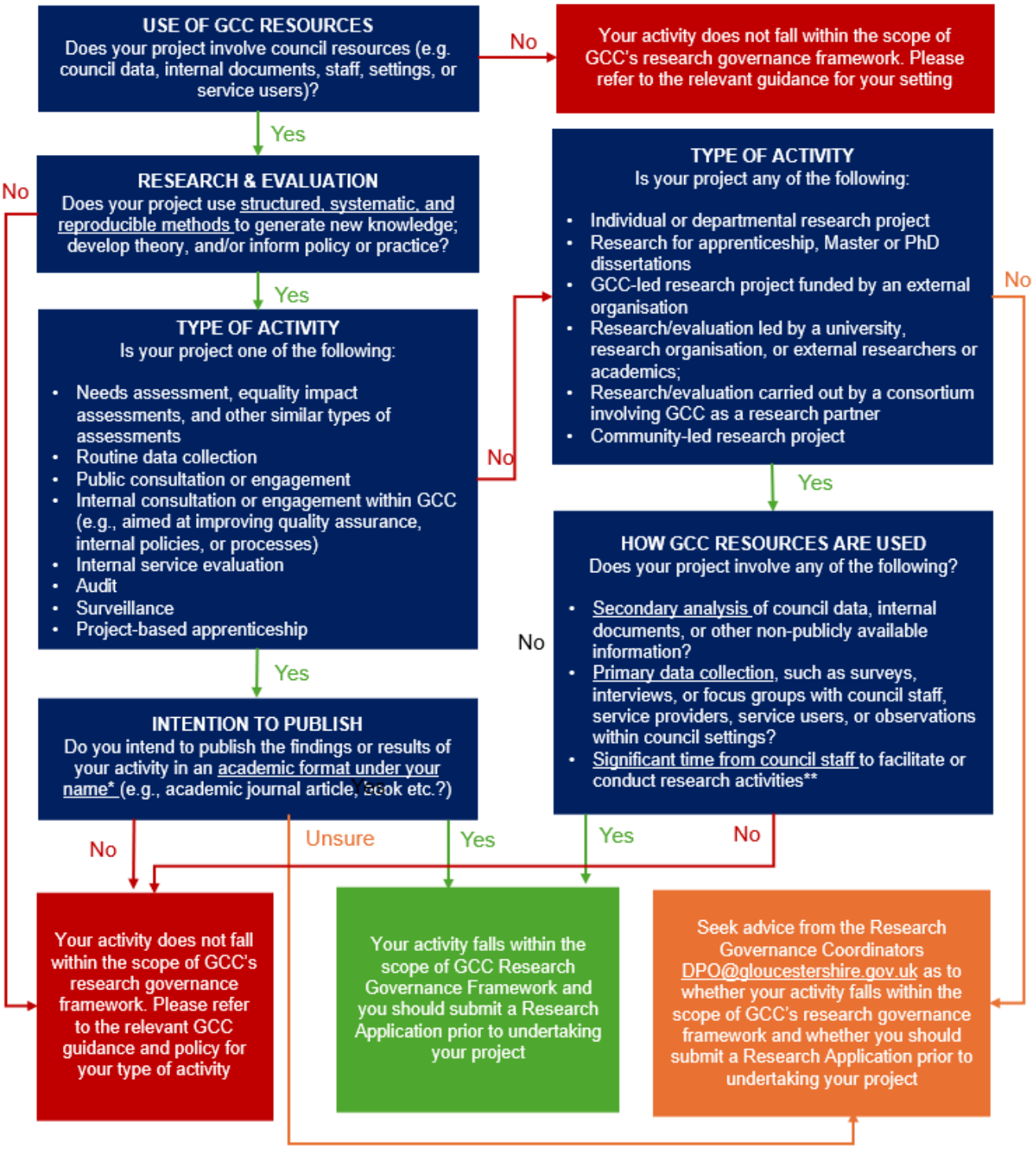
What does it cover?

Research with a big 'R'. This refers to research and evaluation projects that **use structured, organised and reproducible methods** to produce **generalisable knowledge** and/or **support decision-making**, that use **GCC resources and** are intended for **publication.**

What does it not cover?

Research with a small 'r', that is: 'everyday activities staff already do that involve gathering information, exploring questions, and learning from people and practice'[1]. This framework does not cover **activities that are conducted internally to GCC as part of business as usual and which are already covered by existing policies and frameworks,** including: needs assessments; equality impact assessments and other 'assessments'; routine data collection; public consultations; internal consultations aimed at improving quality assurance, internal policies, or processes; internal service evaluations; audits; and surveillance.

[1] Crocker, S. (2026). 'Big R – small r': developing a more inclusive way to talk about research. ADASS. https://www.adass.org.uk/big-r-small-r-developing-a-more-inclusive-way-to-talk-about-research/



* If you intend to publish findings and results from your research projects in an academic format under your name, you must ensure that appropriate research ethics are followed and that the council is sighted and given the opportunity to assess risks related to publication. Academic publishers require that participants are fully informed and have given consent for their data to be used for research and publication purposes. They also often expect that the study has received ethical clearance from the appropriate body. Please refer to the GCC's Research Governance Framework.

** This excludes staff who have been released from their usual duties to undertake part-time apprenticeships, master's, or PhD research.

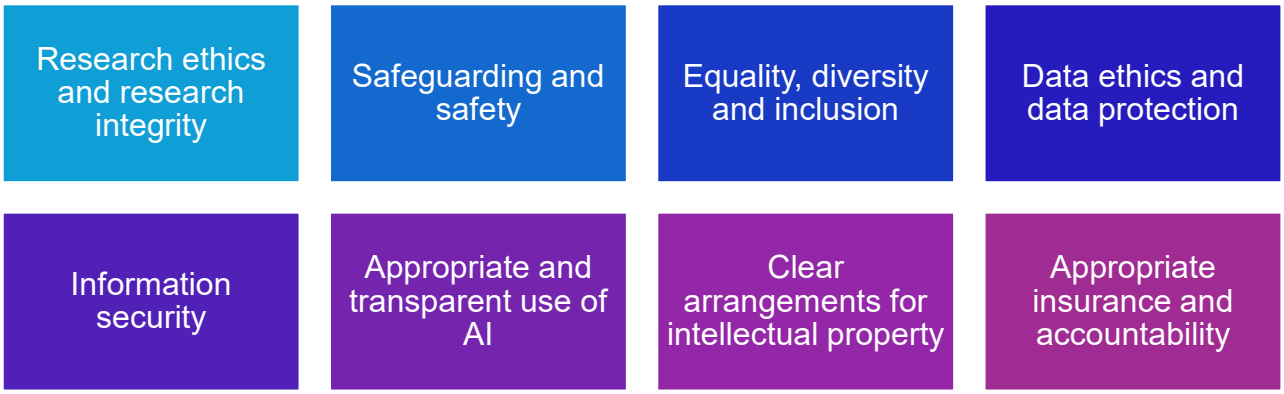
Who is it for?

This framework applies to anyone seeking to access or use council resources for research:

- **Internal to the council**: For example, council staff conducting research as part of their part-time Master's or PhD studies or as part of an externally funded research project.
- **External to the council**: For example, academics, research fellows, visiting scholars; university students; researchers funded by government departments; charities conducting research; or commercial research companies.

The **screening tool** above helps determine if a project falls into the scope of this framework.

What standards must research meet?



How does the process work?

Those who want to use council resources for research should follow the following process:

STEP 1: BEFORE APPLYING	• Review the research governance framework • Take five minutes to check whether the project is in scope by using the 'Screening Tool' (Appendix A). • Contact the Research Governance Coordinators for advice if needed DPO@gloucestershire.gov.uk
STEP 2: APPLICATION	• Complete the Research Application Form (Appendix C) • Fill out the Self-Assessment Risk Tool (Appendix D) • Submit them alongside relevant supporting documents to the Research Governance Coordinators at DPO@gloucestershire.gov.uk
STEP 3: REVIEW	The application will be reviewed using the Research Review Form (Appendix E) based on its level of risk: • **Low risk:** reviewed by Research Governance Coordinators • **Medium risk**: reviewed by members of the Research Advisory Group and relevant teams depending on the subject area • **High risk:** reviewed by members of the Research Advisory Group and relevant teams depending on the subject area, with

	final decision made by the relevant directorate leadership
STEP 3: DECISION	The review can result in the following outcomes: • Approved (with or without conditions) • Request for clarification or amendments • Declined
STEP 4: AFTER APPROVAL	• Follow the agreed conditions and standards • Keep GCC informed of progress • Share findings and outputs with the council

What roles and responsibilities does it outline?

The framework outlines the following roles and responsibilities:

- **Applicants** are responsible for designing ethical, compliant research; submitting complete applications; following agreed standards and conditions; managing risks; and sharing progress and findings with GCC
- **GCC's Research Governance Coordinators,** who sit in Information Management Service, act as the central point of contact. They provide advice, manage and log applications in the central GCC Research Register, and coordinate the review process for low-risk studies.
- **GCC's Research Advisory Group** maintains oversight of research requests through GCC's Research Register, coordinates the review of medium-risk studies, supports risk assessment and escalation, promotes good practice across the organisation, and ensures learning from research is shared.
- **GCC's Senior Leadership Teams** review and make decisions on high-risk or high-impact research relevant to their directorates, ensuring appropriate oversight where there are significant risks or opportunities for learning.

ABBREVIATIONS

ADASS	Association of Directors of Adult Social Services
ADCS	Association of Directors of Children's Service
AI	Artificial Intelligence
DBS	Disclosure and Barring Service
DPA	Data Protection Act
DPIA	Data Protection Impact Assessment
DSA	Data Sharing Agreement
EDI	Equality, Diversity, and Inclusion
GCC	Gloucestershire County Council
HRA	Health Research Authority
IP	Intellectual Property
IPR	Intellectual Property Rights
NIHR SCPH	National Institute for Health and Care Research Specialist Centre for Public Health
ODI	Open Data Institute
UK GDPR	UK General Data Protection Regulation
UKRI	UK Research Innovation

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1. INTRODUCTION

At Gloucestershire County Council (GCC), evidence informs decision making. To understand the needs of residents and design effective and efficient services and policies, staff draw on data, insights, independent research, and recognised best practice.

GCC values research that supports decision making and welcomes requests from staff, students, partners, external organisations, and researchers to **use council resources** (e.g., data, staff, settings, service providers, people drawing on GCC services) **for research** that aligns with council priorities, generates local insights, supports practice development, and fosters inclusive services and innovation**.**

GCC's research governance framework (hereafter 'the framework') exists to define:

- The standards and procedures that must be followed before any research involving council resources takes place.
- How staff, individuals, and organisations can request to use council resources for research purposes, and how such requests will be assessed.
- The responsibilities of researchers and the council during the approval process, delivery, and after completion of the research.

This framework has been created with **internal advice** from GCC Information Board, Human Resources, Insurance Team, Legal Corporate Division as well as **external advice**, including Gloucestershire Integrated Care Board, Gloucestershire Hospital NHS Foundation Trust, Research4Gloucestershire, NIHR Specialist Centre for Public Health, and the Local Authority Research Practitioners Network.

This framework **aligns with national and local policy frameworks for research**, including the UK Policy Framework for Health and Social Care Research and the UK Research Integrity Office's Code of Practice for Research. It also **draws from good practices** from the research governance approaches implemented in other local authorities, including Cumberland County Council, Havering Council, and North Yorkshire Council.

This document is structured as followed:

- **Section 1** introduces the framework.
- **Section 2** defines the framework's purpose.
- **Section 3** describes how the framework adds value to the council.
- **Section 4** outlines the framework's scope and who it applies to.
- **Section 5** specifies the standards any research involving council resources must meet.
- **Section 6** describes the process for submitting, assessing and responding to requests to use council resources for research purposes
- **Section 7** clarifies how research-related complaints and misconducts are managed.
- **Section 8** sets out the responsibilities of researchers and the council during the approval process, the delivery of the research, and following its completion.
- **Section 9** provides key contacts for queries and questions.
- **The appendix** presents research governance forms and templates.

2. PURPOSE

The purpose of the framework is to **ensure that research involving council resources is conducted safely, ethically, legally, and in alignment with council priorities**. It aims to:

- Ensure that council resources support research that aligns with council resources.
- Protect people, data, and GCC by ensuring research using council resources complies with relevant laws, ethical principles, accessibility and inclusion standards.
- Provide a consistent approach for processing research requests from staff and external organisations and individuals, ensuring all research requests approved meet the same standards.
- Empower staff to make informed decisions about research requests, while fostering accountability and integrity through clear documentation and monitoring.
- Promote excellence, co-production, collaboration, and learning from research.

3. WHY IT IS IMPORTANT?

Local authorities are increasingly investing in research and strengthening their use of evidence to inform decision-making. Research is essential as it attracts external funding and supports the delivery of council priorities more effectively. It improves services by identifying what works, for whom, and why, and enables innovation and collaboration.

Without a formalised approach to governing and overseeing research activity, a number of challenges can arise. Staff may feel uncertain about ethical, legal, and reputational risks; research activity can become fragmented; and valuable insights may not be captured or shared, limiting organisational learning and opportunities for collaboration.

This framework addresses these challenges and adds value to the council:

- **Strategic value**: It enables GCC to use research to inform priorities, attract funding, and support effective decision-making, while positioning the council as a trusted partner for universities, funders, and external organisations.
- **Legal and ethical assurance**: It provides legal and ethical assurance by ensuring research is conducted in line with data protection requirements, safeguarding responsibilities, and recognised ethical standards.
- **Workforce development**: It supports workforce development by building staff confidence, skills, and opportunities to engage in high-quality research and collaborations with academic and external partners.

4. SCOPE

4.1 What does the framework cover?

Research with a big 'R'[2].

[2] Crocker, S. (2026). 'Big R – small r': developing a more inclusive way to talk about research. ADASS.

This framework applies to**:**

- **Research that involves council resources.**

  Broadly speaking, research is the systematic process of collecting, analysing, and interpreting information to deepen our understanding of a topic or issue and generate new knowledge for publication and dissemination. GCC adopts the consensus definition of **local authority research** produced by the National Institute for Heath and Care Research (NIHR) Specialist Centre for Public Health (SCPH) (Box 1) after consulting over 60 local authority staff across the country.

- **Evaluations involving council resources that are intended for publication** and that seek to produce generalisable knowledge.

Box 1. NIHR SCPH's (2025) local authority research consensus definition

Local authority research:

- Supports decision making about practice, policies and interventions at a local, regional or national level.
- Helps us to understand how people are impacted by the context in which they live, work, and go about their daily lives.

Research uses structured, organised and reproducible methods to:

- Produce new information or knowledge, which may include testing an idea, theory or new intervention.
- Provide a new interpretation of existing information. This may include routinely collected data being used for a new purpose, as well as publicly available data.

Individuals and organisations may request to use council resources (for examples, see Table 1) to conduct **primary** research (i.e. the researcher collects new data) or **secondary** research (i.e. the researcher analyses and synthetises existing data). Studies can adopt a variety of methodologies (e.g., **quantitative, qualitative, mixed methods, participatory**).

Table 1. Examples of council resources applicants can request to use for research purposes.

Example	Description
Pupils Wellbeing Survey	Undertaken biennially by GCC, this survey collects data from 25,000+ pupils from Gloucestershire schools, colleges and education settings, covering a diverse range of topics relating to health and wellbeing.
Annual Adult Social Care Survey	Undertaken annually by GCC, this survey collects quantitative and qualitative data on the experiences of those who use adult social care services.
Unpaid Carers Survey	Undertaken biennially by GCC, this survey collects data on carers' experiences and outcomes.
Service providers data	Where GCC is the data controller and service providers are data processors, prospective applicants may apply to access service providers' data.

Partnership Boards	GCC's Partnership Boards include people with lived experience, families, carers, and representatives from a wide range of organisations to understand local needs and shape policies and services. GCC has five key partnership boards covering 1) Autism & Neurodivergence; 2) Carers; 3) Learning Disability; 4) Mental Health & Wellbeing; 5). Physical Disability & Sensory Impairment. Prospective applicants may request to, for example, get access to members of the partnership boards for qualitative research.
Staff	Prospective applicants may want to apply to conduct research with GCC staff on a variety of topics e.g. service delivery, social work etc.
Children and adults in care	Research involving children and/or adults in the care of GCC is subject to council research governance. Prospective applicants are required to seek formal approval from GCC before accessing participants or data.

4.2 What does it not cover?

Research with a small 'r', that is: 'everyday activities staff already do that involve gathering information, exploring questions, and learning from people and practice'[3].

This framework does not cover **activities that are conducted internally to GCC as part of business as usual and which are already covered by existing policies and frameworks,** including:

- **Needs assessments—**the systematic process by which councils, in collaboration with partners, gather information about the needs of populations or groups in communities to inform commissioning, service planning, and decision-making.
- **Routine collection of data** carried out as part of everyday council delivery.
- **Internal consultations and/or engagement** aimed at improving quality assurance, internal policies, processes, or practice.
- **Public consultation and/or engagement —**the process by which the council gathers residents' views, feedback, and opinion on a specific proposal or policy.
- **Internal service evaluations** that are 'designed and conducted solely to define or judge current care or service, or to deliver and measure improvements in quality of the current service' (Health Research Authority [HRA], 2022) and which are not meant for publication and that do not aim to produce generalisable knowledge.
- **Audits**, which are designed to assess whether a service meets predefined standards or guidelines (HRA, 2022).
- **Surveillance and intelligence activity** conducted to assess priorities, and detect and manage threats, risks, and inequalities (HRA, 2022).

4.3 Who does it apply to?

This framework applies to anyone seeking to access or use council data for research both:

- **Internal to the council**: For example, council staff conducting research as part of their part-time Master's or PhD studies or as part of an externally funded research project.

[3] Crocker, S. (2026). 'Big R – small r': developing a more inclusive way to talk about research. ADASS.

- **External to the council**: For example, academics, research fellows, visiting scholars; university students; researchers funded by government departments; charities conducting research; or commercial research companies.

The screening tool in Appendix A can help prospective applicants determine if their project falls into the scope of this framework and whether they should submit a research application.

5. STANDARDS & REQUIREMENTS

This section outlines the standards and requirements research involving council resources must comply with. In defining these, we drew from national frameworks for research, guidance from NIHR SCPH, and the requirements set out in research governance frameworks implemented in other local authorities, including Cumberland County Council and North Yorkshire Council, adapting them these to GCC.

5.1 Research Ethics

Any research involving council resources must be conducted ethically. Ethical research protects the rights, dignity, and wellbeing of participants, researchers, and the wider public. Key ethical principles that include respect for participants; voluntary participation; informed consent; anonymity and confidentiality; right to withdraw; maximise benefit and minimise harm; safety and safeguarding; data protection (UKRI, 2025).

There are several ethical guidelines that support responsible research practice. Most research studies undergo independent ethical review to ensure they meet recognised ethical standards:

- Universities typically have their own research ethics committees and researchers and students must follow their institution's internal policies.
- For research involving NHS patients, service users, carers, staff, volunteers, data, tissue or facilities, an application must be made to an NHS Research Ethics Committee. The HRA decision tool can help determine whether approval from NHS Research Ethics Committee is required.
- For adult social care research involving four or more local authorities, approval from the Association of Directors of Adult Social Services (ADASS) is required.
- For children social care research involving four or more local authorities, approval from the Association of Directors of Children's Service (ADCS) is required.

Those conducting research using council resources are expected to:

- Identify and apply the most appropriate ethical standards for their project.
- Seek ethics approval from the relevant body OR explain why ethics clearance was not sought. This may apply to research projects led by GCC that do not involve universities or vulnerable groups (e.g., NHS patients or individuals lacking capacity to consent) and therefore do not require the ethical review processes outlined above. In such cases, applicants are expected to explain why ethics clearance was not sought and to demonstrate how appropriate ethical standards are being applied to the project.

5.2 Research integrity

Individuals and organisations conducting research using council resources are expected to act with integrity. Research integrity applies both at the individual and organisational level. As stated in the UK Concordat to Support Research Integrity (2019), research should be guided by **honesty** in presenting research aims, data, methods, and findings; **rigour** by using appropriate methods and maintaining high standards; **transparency** by openly sharing methods, data, results, and any conflicts of interest; **care and respect** for all those involved; **accountability** by ensuring all parties are responsible for their conduct. This also includes ensuring all research has financial probity and is compliant with the law as well as consideration of how to deal with negligence claims if such things occur.

5.3 Research with vulnerable people

Research involving vulnerable individuals requires heightened ethical consideration and enhanced protections. UK Research Innovation (UKRI) identifies vulnerability as arising in a range of circumstances, including (but not limited to): experiences of abuse; age-related vulnerability; disability; mental ill-health; cognitive impairment; refugee, asylum, or insecure immigration status; or disadvantageous power relationships.

Researchers must take all reasonable steps to protect the rights, dignity, welfare, and safety of vulnerable participants. A key part of this is ensuring **informed consent**. Consent processes must therefore be tailored to participants' needs, using clear and accessible communication and checking understanding throughout.

If a person aged 16 or over may lack capacity to consent, the **Mental Capacity Act 2005** provides safeguards for those who lack the capacity to consent to participate in research. In these cases, **researchers must seek approval from the Social Care Research Ethics Committee or an NHS Research Ethics Committee.**

5.4 Safeguarding and safety

Individuals and organisations conducting research using council resources are expected to:

- **Take appropriate steps to minimise safeguarding risks and respond promptly and effectively to any concerns**. Safeguarding refers to protecting a person's health, wellbeing, and right to live safely, free from harm, abuse, and neglect. Researchers must adhere to GCC safeguarding policies when involving GCC staff, residents, service providers and people drawing on services in research (see: GCC Safeguarding Children Procedure; GCC's policy and procedure for safeguarding adults)
- **Ensure the safety and wellbeing of researchers**. Appropriate measures must be taken to protect researchers from physical, emotional, psychological, and legal harm, particularly when working in sensitive settings, with vulnerable groups, or on emotionally demanding topics.

Please note that Disclosure and Barring Service (DBS) check is required for projects involving direct interactions for children and young people and adults in social care.

5.5 Equality, Diversity and Inclusion (EDI)

EDI is fundamental to high-quality research. UKRI guidance emphasises exploring EDI

considerations throughout the entire lifecycle of a project, from design, recruitment, delivery, and dissemination. **Researchers are expected to consider**, for example:

- **Representation.** Researchers should reflect critically on which groups are being involved and which are being overlooked. Research does not always take place where it is most needed, and some communities are persistently under-represented.
- **Accessibility**. Information provided to participants must be clear, easy to understand, and available in accessible formats where required. Researchers must also consider reasonable adjustments that may support equitable participation. These same principles apply when sharing research findings.
- **Co-production and public involvement**. Researchers should seek, where possible and appropriate, to involve people with lived experience, communities, and relevant stakeholders in shaping the research. Co-production can strengthen research relevance, quality, and impact. GCC's principles for co-production are outlined in the 2025 Collaborative Partnership Board's Co-Production Charter.

These considerations:

- **Help researchers comply with the Equality Act 2010**, which consolidates previous anti-discrimination laws and protects individuals from unfair treatment based on protected characteristics (age, disability, race, sex, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership).
- **Support compliance with the Public Sector Equality Duty (Section 149 of the Equality Act 2010),** which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups.

5.6 Information security

Research must comply with a set of information security standards, including:

- **Data handling and security**: All research data must be recorded, handled, stored, and protected in ways that ensure accuracy, reliability, and verifiability while safeguarding participant confidentiality and privacy. Once transferred to the researcher, the data must be protected from unauthorised access, disclosure, loss, or corruption using approved security measures.
- **Data storage and use**: Raw data must be held under secure and approved conditions and may not be reused for any other non-agreed purpose. All data must remain confidential and must not be used to make decisions about, or cause detriment to, any individual.
- **Retention and disposal**: Prior to the research starting, the researcher must agree with GCC an acceptable retention period for raw data. Raw data and any transferred research data must be securely deleted or destroyed in line with GCC retention schedules or within an agreed period.
- **Reporting and publication**: Published findings must be anonymised and must not allow individuals (data subjects) to be identified, directly or indirectly.

GCC has its own suite of Data Protection and Information Security policies. The researcher

must ensure they have read and understood the requirements set out in these policies.

5.7 Data ethics

The Open Data Institute (ODI) defines data ethics as the branch of ethics that considers the impact of data practices on people, society, and the environment. Data ethics involves making responsible, fair, and transparent choices when collecting, using, storing, sharing, and deleting data—asking not only "can we?" but "should we?". **Data ethics** is essential in research to protect participants' rights and privacy, prevent harm, ensure the fair and responsible use of data, and maintain public trust. These principles **should be embedded throughout the research process**. GCC has endorsed an Ethical Data Stewardship commitment and the use of the ODI Data Ethics Canvas. **Researchers are encouraged use ODI's Data Ethics Assessment Form** to record how data ethics issues will be measured, monitored, discussed, and acted upon. GCC staff can access further guidance on data ethics here.

5.8 UK GDPR & Data Protection Act 2018

Data protection legislation controls how personal data is used by individuals and organisations.

- **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** include 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.

In the UK, data protection is governed by the UK GDPR and the Data Protection Act 2018, which include specific provisions for processing personal data for research-related purposes. These provisions aim to balance data protection with the societal benefits of research. The Information Commissioner's Office provides substantial guidance on the relationship between data protection and research.

Researchers are expected to:

- Ensure that any collection or use of personal data complies with the seven data protection principles: Lawfulness, fairness and transparency; Purpose limitation; Data minimisation; Accuracy; Storage limitation; Integrity and confidentiality; Accountability.
- Establish that the purposes for which data will be used are legitimate, lawful and only data relevant to those purposes will be collected.
- Be clear about how they are going to obtain consent from participants to collect and store their data in ways that maintain confidentiality and anonymity.
- Make participants aware of the possibility that their data may be used for a variety of purposes.
- State how long they intend to keep data after the study has been completed before they are destroyed. Sometimes, data can be passed to data archives, researchers need to state if this is their intention and obtain explicit consent.
- Ensure participants have good, clear and sufficient information about the reasons for the research and consequences of taking part by providing accessible information

about the nature and purpose of the research, what taking part involves, the level of anonymity or confidentiality possible, their entitlement to refuse to take part at any stage without giving a reason, and to withdraw any supplied data.

GCC has its own suite of Data Protection and Information Security policies. **The researcher must ensure they have read and understood the requirements set out in these policies**.

5.9 Data Protection Impact Assessments

The research lead should assess their project requires conducting a Data Protection Impact Assessment (DPIA). DPIAs:

- Help organisations analyse, identify, and reduce the data protection risks of a project. It is particularly important where processing is likely to result in a high risk to individuals' rights and freedoms, which is often the case in research involving sensitive data or vulnerable groups.
- Require researchers to outline what personal data will be processed, why it is needed, the lawful basis for processing, and how the data will be stored securely. It must also set out the safeguards in place, explain how data will be anonymised or pseudonymised, and how any reidentification risks will be managed.

Those seeking to use council resources for research that involves high risk, are expected to complete a DPIA.

The Self-Assessment Risk Tool[4] in Appendix D can be used to assess the level of risk of the research project. The DPIA template in Appendix F can be used but GCC will also accept external DPIA templates if these are already complete.

5.10 Data Sharing Agreements

Individuals and organisations that seek direct access to personal or confidential data held by GCC must:

- **Complete a DPIA** where the risk score obtained from the Self-Assessment Risk Tool (Appendix D) is high **AND**
- **Establish** a **formal Data Sharing Agreement (DSA)** between GCC and the researcher or their host organisation (see Appendix G for a DSA template that can be used and adapted to the research project).

GCC will grant access to personal and/or confidential data only following approval of the DPIA and once the DSA has been signed by all relevant Parties.

5.11 Artificial Intelligence

Artificial intelligence (AI) must not be used to process council data as part of a research project. AI tools may lack appropriate security assurances and may reuse or disclose content for secondary purposes, which raises ethical and data protection concerns for research and evidence gathering. Where a researcher believes there is a justified reason to use AI within

[4] This self-assessment risk tool was originally developed by North Yorkshire Council and later adapted by Havering Council. It has since been incorporated into our research governance framework and further adapted to the GCC context through the addition of a risk scoring component.

their project, this must be clearly declared and researchers must seek advice from the Research Governance Coordinators (DPO@gloucestershire.gov.uk). **Where the use of AI would be intended to process personal data, a DPIA must be completed and approved** prior to the use of any AI system.

5.12 Intellectual Property

Within this Research Governance Framework, Intellectual Property (IP) refers to the ownership of outputs generated through research and evaluation activities. These outputs may include reports, presentations, journal articles, data summaries, narratives, or more creative forms of dissemination.

Although the legal position can be complex, the following principles apply:

- **For studies led and conducted by GCC employees**: In these cases, GCC would normally own IP of the outputs created by its employees as part of research and evaluation studies. If the study conducted by GCC employees is funded by an external organisation, GCC staff must review the funder's terms and conditions and agree on IP ownership for any outputs before the project begins.
- **For studies commissioned by GCC**: In these cases, IP ownership is determined on a case-by-case basis. All partners must agree IP arrangements in advance. Typically, academic institutions retain IP rights for research findings to allow publication. All agreements should be negotiated and reviewed by the legal teams of the organisations involved.
- **For studies conducted by research consortia involving GCC as a partner:** As with other collaborative projects, IP ownership is agreed on a case-by-case basis and must be established before work begins. Legal teams for all partners should review and approve the final arrangements.
- **For studies involving council resources conducted by researchers in residence, students, or external researchers**: In these cases, IP would typically remain with the university or organisation employing the external researchers, unless a different arrangement is explicitly agreed.

For advice or guidance, prospective applicants may contact GCC's Legal Corporate Division at legalcorporatedivision@gloucestershire.gov.uk

5.13 Research liability insurance

Liability insurance is essential for protecting researchers from potential legal claims arising from their work. Anyone conducting research using council resources must have appropriate liability insurance in place. The following requirements apply:

- **GCC staff**: Research undertaken by GCC employees as part of their role is covered under the Council's Employee Code of Conduct and existing insurance, provided they have applied for and been granted research approval. This will confirm that the activity is part of the Council business activities which is a requirement of the existing insurance arrangements.
- **External researchers**: External researchers must be covered by their own organisational insurance (e.g., university or employer), ensuring it is valid for the research activities proposed.

- **Students:** Students must be covered by their university's insurance. It is their responsibility to check coverage with their university or academic supervisor.
- **Research consortia**: For projects involving multiple organisations, each organisation must have its own liability insurance covering the activities of staff involved in the research.

All individuals or organisations applying to use council resources must provide proof of liability insurance that covers their project and proposed activities.

6. PROCESS

This section outlines how individuals and organisations can request to use council resources for research purposes and how such requests will be assessed and monitored. The process flowchart can be found in Appendix B.

6.1 Application

- **Prior to submission:** Applicants should familiarise with GCC's Research Governance Framework and use the screening tool in Appendix A to assess whether their proposal falls within the scope of the process. Internal applicants (i.e. GCC staff) must discuss their intention to apply with their line manager and obtain approval. External applicants are expected to discuss their plans with their research lead before applying. Both internal and external applicants may seek advice from GCC's Research Governance Coordinators (contact: DPO@gloucestershire.gov.uk).
- **Preparing the application:** For each proposed project, applicants must complete the Research Application Form[5] (Appendix C) and fill out the Self-Assessment Risk Tool (Appendix D).
    - *Additional requirement for high-risk research projects*: If the Self-Assessment Risk Tool indicates high risk and the research involves processing personal data, the applicant is expected to complete a Data Protection Impact Assessment (DPIA) and submit it alongside the application. The DPIA template in Appendix F can be used but GCC will also accept external DPIAs.
    - *Additional requirements for those seeking direct access to personal or confidential data held by GCC:* Applicants are expected to complete a DPIA (the DPIA template in Appendix F can be used) and establish a formal Data Sharing Agreement (DSA) between GCC and the researcher or their host organisation (see Appendix G for a DSA template that can be used and adapted to the research project).
- **Submission:** Completed applications should be submitted to the GCC Research

[5] This form was developed by adapting and combining early version designed within GCC's Information Management System and Children's Services, alongside templates developed and implemented by Havering Council and North Yorkshire Council.

Governance Coordinators at DPO@gloucestershire.gov.uk . Applicants must attach all relevant supporting documents.

6.2 Review

The process applies a proportionate review system to minimise barriers to research that could benefit GCC while effectively managing risk. Research applications are assessed through a tiered system:

- **Stage 1:** Low-risk applications are reviewed by GCC's Research Governance Coordinators who hold specialist knowledge in data protection and data ethics.
- **Stage 2:** Medium-risk applications are reviewed by members of GCC's Research Advisory Group with relevant subject-matter expertise. Members bring expertise in research and evaluation, responsibilities for training and quality improvement, and knowledge in data protection and ethics. With representation across directorates, the group is well positioned to assess requests and identify relevant colleagues to contribute to the review when specialist advice is needed.
- **Stage 3:** High-risk applications with significant potential benefits or learning for GCC are first reviewed by members of GCC's Research Advisory Group with relevant subject-matter expertise. The group makes a recommendation, and the application is then escalated to the relevant leadership for a final decision.

Risk is assessed using the Self-Assessment Risk Tool (Appendix D) completed by the applicant and submitted as part of their application. The review is expected to take a total of 6 weeks and to be conducted using the **Research Review Form**[6] (Appendix E).

6.3 Decision

Following the review, the GCC Research Governance Coordinators will communicate the decision to applicants. Possible outcomes include **Approve, Reject, or Amend**. Before a final decision is made, GCC may request clarification or additional information from the applicant. **Approval may be granted on a conditional basis**, meaning certain requirements must be met—such as sharing research findings with GCC in an accessible way or acknowledging GCC's contribution. In some circumstances, where a project offers significant potential benefits but carries high reputational risk, **GCC may issue a Right to Review and Reply**. In these cases, approval is granted only on the condition that GCC may check the factual accuracy of research reports prior to publication.

6.4 Monitoring and learning

For approved projects, applicants are expected to share progress updates and final outputs as they become available. GCC's Research Governance Coordinators and members of the GCC's Research Advisory Group may request progress updates in line with the timelines provided in the application. For projects approved with a **Right to Review and Reply**, researchers must share their final report and findings with GCC **before publication** to allow time for factual accuracy checks. Once the research is completed and outputs have been received, GCC's Research Governance Coordinators will update the **GCC Research**

[6] This form was developed by adapting templates originally designed and implemented by Havering Council and North Yorkshire Council.

Register and share the outputs with the **GCC Research Advisory Group**, who are responsible for supporting learning from the research across relevant staff and stakeholders.

7. COMPLAINTS & MISCONDUCT

GCC is committed to using transparent, timely, robust and fair processes to deal with complaints and allegations of research misconduct should they arise.

7.1 Making a complaint

Complaints from individuals who are not employed by GCC should be submitted following the Corporate Complaints Procedure available on the GCC website. These complaints are reviewed by the Corporate Complaints Team, who assess the issue and determine the appropriate action. If the concern relates to the conduct of a GCC employee, it will be passed to the relevant manager and may be considered under the appropriate GCC HR procedures. All complaints are assessed on a case-by-case basis.

For concerns raised by GCC employees, the first step is to try to resolve the matter informally by speaking directly with the individual involved or the responsible manager. If the issue cannot be resolved through informal discussion, **the employee may escalate it through the formal GCC Grievance Resolution Process**.

7.2 Reporting misconduct

As outlined in the UK Concordat to Support Research Integrity (2025), research misconduct can take many forms and include fabrication, falsification and plagiarism, as well as failure to meet legal ethical and professional obligations such as:

- Not observing legal, ethical, and other requirements for human research participants, animal subjects, or human organs or tissue used in research, or for the protection of the environment.
- Breach of duty of care for humans involved in research whether deliberately, recklessly, or by gross negligence, including failure to obtain appropriate informed consent.
- Misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality.
- Improper conduct in peer review of research proposals, results, or manuscripts submitted for publication.

Researchers must notify GCC of any fabrication, falsification, plagiarism, and failure to meet legal or professional obligations, misrepresentation, improper dealing with allegations of misconduct. They can use the same complaints procedures outlined in section 6.1. Any breaches will be dealt with under the appropriate GCC policy.

8. RESPONSIBILITIES

This section sets out the responsibilities of all those involved in the approval process, the delivery of the research, and following its completion.

Applicants

- Familiarise with GCC's Research Governance Framework.
- Check whether the proposed project is in scope using the Screening Tool.
- Prepare a complete and accurate application, including the Research Application Form, Self-Assessment Risk Tool, and any other relevant documentation.
- Provide honest, truthful, and transparent information about the project.
- Respond promptly to requests for clarification or amendments during the review.
- Comply with all standards, policies, and ethical expectations throughout the project.
- Flag any emerging risks, delays, or issues to GCC as soon as they arise.
- Keep GCC updated on research progress, share findings and outputs, and collaborate with GCC where applicable to foster learning from the research.
- For projects with a Right to Review and Reply, submit final reports before publication to allow time for factual accuracy checks.

GCC Research Governance Coordinators

- Address queries from prospective applicants.
- Receive, log, and record research requests in GCC's Research Register.
- Check for conflicting or overlapping historic or current research requests using GCC's Research Register
- Check applications for completeness and that decisions are made within expected timeframes.
- Coordinate the review process for low-risk applications using the Research Review Form and ensuring members of the GCC's Research Advisory Group with relevant subject-matter expertise are sighted on the review.
- Communicate decisions to applicants.
- Update GCC'S Research Register when projects are approved, amended, or completed.
- When the project is complete, gain confirmation from researchers that data has been archived and/or deleted in line with expectations.
- Flag concerns and risks as they emerge to GCC's Research Advisory Group.
- Contribute to continuous improvement of GCC's research governance.

GCC Research Advisory Group

- Contribute to raising awareness about GCC's Research Governance Framework.
- Coordinate the review process for medium-risk research applications using the Research Review Form, involving relevant specialists when additional expertise is required and ensuring Caldicott Guardians are sighted on applications requesting direct access to personal information.
- Support the escalation of high-risk applications to the relevant directorate leadership.
- Address concerns and risks to approved research projects as they arise, including by escalating them to Caldicott Guardians and the relevant directorate leadership.
- Assign a GCC staff member from the appropriate directorate or team to each project to seek updates and to promote organisational learning from the findings.
- Regularly review GCC's Research Register to maintain oversight of research activity.
- Review final outputs for projects approved with the Right to Review and Reply.
- Annual review of research governance summary reporting

- Contribute to continuous improvement of GCC's research governance processes
- Promote a culture of ethical, high-quality research across the organisation.
- Through membership to other groups e.g. Research4Gloucestershire share, as appropriate, GCC's research position

GCC Senior Leadership Teams

- Review and make decisions on high-risk, high rewards research applications, ensuring Caldicot Guardians are sighted and/or involved when assessing high risk research requests that ask for direct access to personal information.
- Support the Right to Review and Reply process when high-risk or sensitive projects require senior oversight of factual accuracy before publication.
- Support continuous improvement of GCC's research governance.

9. CONTACTS

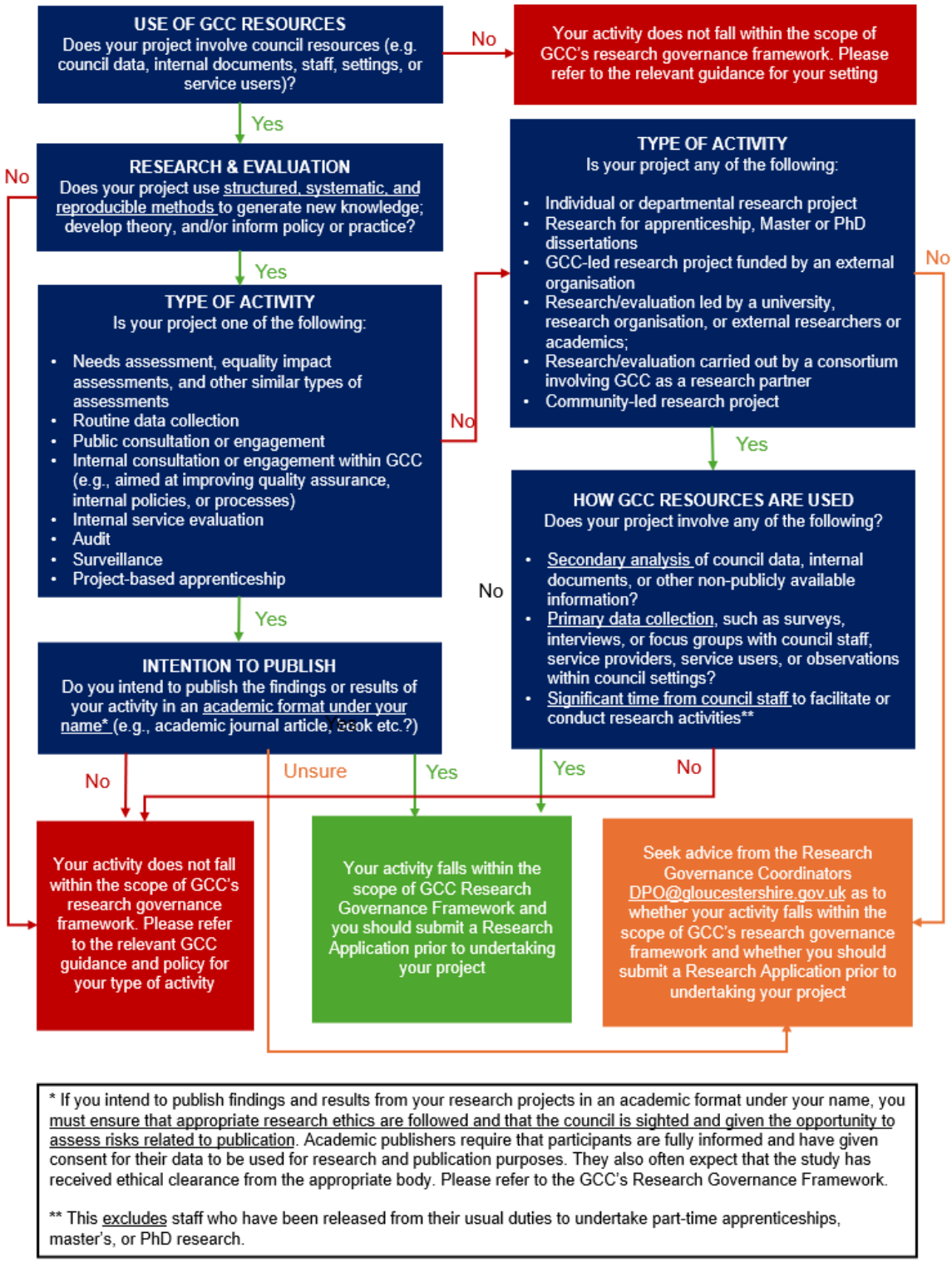
GCC's Research Governance Coordinators: DPO@gloucestershire.gov.uk

GCC's Research Advisory Group: publichealth@gloucestershire.gov.uk

APPENDIX

A. Screening tool

The screening tool below can be used to determine whether an activity or project falls within the scope of the research governance framework.

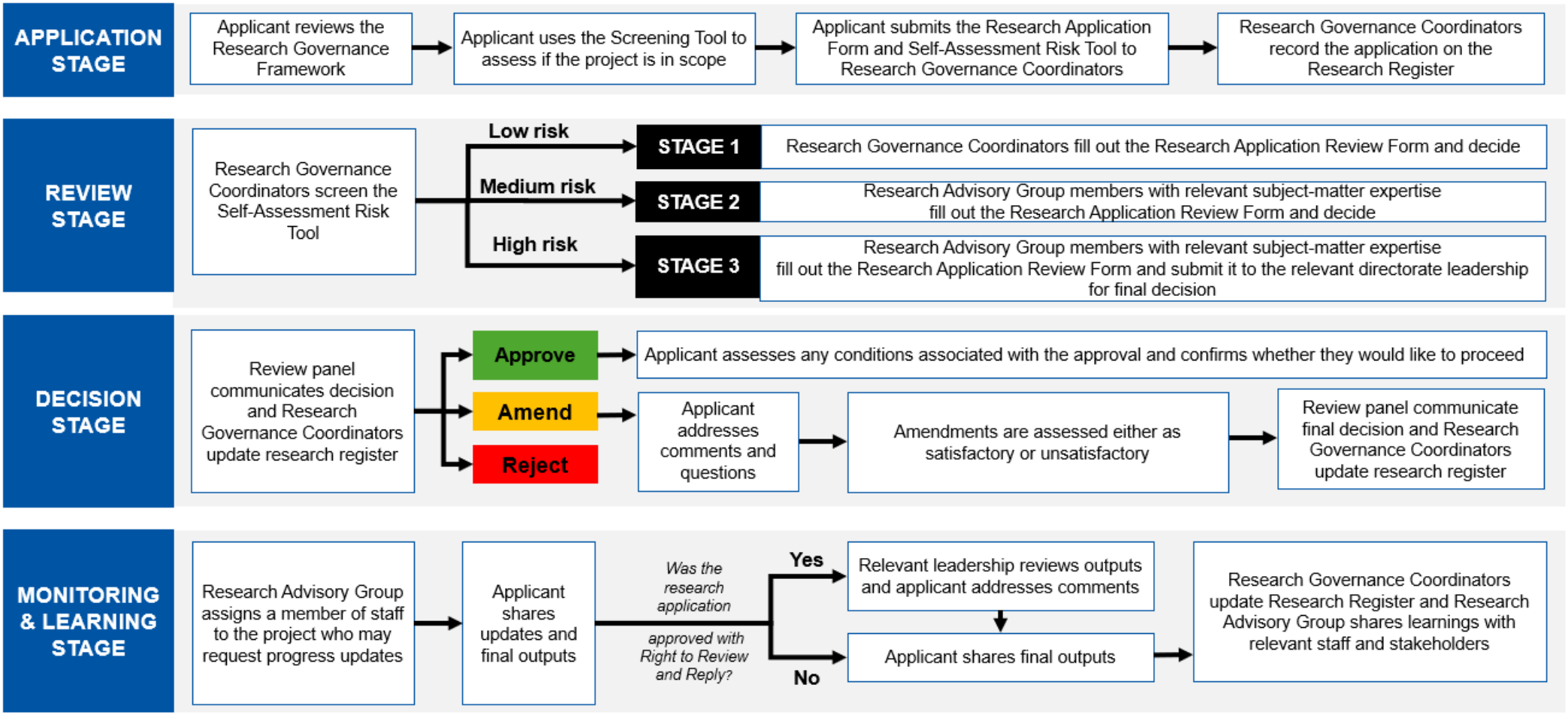


* If you intend to publish findings and results from your research projects in an academic format under your name, you must ensure that appropriate research ethics are followed and that the council is sighted and given the opportunity to assess risks related to publication. Academic publishers require that participants are fully informed and have given consent for their data to be used for research and publication purposes. They also often expect that the study has received ethical clearance from the appropriate body. Please refer to the GCC's Research Governance Framework.

** This excludes staff who have been released from their usual duties to undertake part-time apprenticeships, master's, or PhD research.

B. Process flowchart

All forms can be downloaded from the research governance page **on the Research & Evaluation intranet site** and the **dedicated** research page on GCC's public facing website .



C. Research Application Form[7]

Please complete the Research Application Form in conjunction with the Self-Assessment Risk Form and submit these alongside supporting documents to GCC's Research Governance Coordinators at DPO@gloucestershire.gov.uk

Both forms can be downloaded from the **research governance page on the Research & Evaluation intranet site** and the **dedicated research page on GCC's public facing website** .

1. APPICANT DETAILS

Name	
Email	
Type of applicant. Select all that apply. If you are both a student and a GCC employee, select both options.	☐ Student (Apprenticeship, Master, PhD) ☐ Internal applicant (i.e. GCC employee) ☐ External applicant (i.e. non-GCC employee)
Title / Role	
Organisation & Department	
Supervisor or line manager's details. Please include name, title, contact. If you are both a student and a GCC employee, or undertaking a placement at GCC, please provide details of your academic supervisor *and* your GCC line manager or mentor.	

2. PROJECT OVERVIEW

Title	
Type. Note that internal service evaluations not intended for publication fall outside the Research Governance Process	☐ Research ☐ Evaluation
Where will the research take place? Does your research involve other local authorities? If yes, please name them.	
Level of risk. This needs to be calculated using the Self-Assessment Risk Tool.	☐ Low ☐ Medium ☐ High
Start date & end date	
Short description. Please provide an overview of your project (200 words)	

[7] This form was developed by adapting and combining early templates originally designed within GCC's Information Management System and Children's Services, alongside templates developed and implemented by Havering Council and North Yorkshire Council.

3. ASK OF GCC

3.1 Benefit to GCC. How does your project align with council priorities and benefit GCC?
3.2 Ask. Explain what council resources (e.g., data, staff, people drawing on services) you need and why
3.3 Funding. Provide details regarding funding GCC will receive as part of this work (if any).

4. SPONSOR, FUNDING, TEAM

4.1 Research sponsor. The organisation funding the research or holding the funding award will normally act as the sponsor. For students, the university usually acts as the sponsor. For research led by GCC staff a sponsor must be identified within the directorate, typically a line manager or senior manager.
4.2 Research funding. Please indicate the funding allocated to this study (if any).
4.3 Research team and roles. Who will be conducting the research and what are their roles in the project? What is their experience? Have they completed ethics and data protection training?
4.4 Conflict of interests. Please disclose any conflict of interest the research team or its members may have.

5. APPROVALS, DPIA, DSA

This section asks you to indicate whether your study requires ethical approval, DBS checks, liability insurance, a Data Protection Impact Assessment, a Data Ethics Assessment, or Data Sharing Agreements. For guidance, please refer to Section 5, Standards and Requirements, of GCC's Research Governance Framework.

5.1 Does your study need approval from the NHS Ethics Committee or from the Social Care Research Ethics Committee? For research involving NHS patients, carers, staff, volunteers, data, tissue, or NHS facilities, an application must be made to an NHS Research Ethics Committee. If research participants aged 16 or over may lack capacity to consent, researchers must seek approval from the Social Care Research Ethics Committee or an NHS Research Ethics Committee.	☐Yes ☐No ☐NA (not applicable)
5.2 Does your study require approval from ADCS or ADAD? For adult social care research which involves four or more local authorities, approval from the Association of Directors of Adult Social Services (ADASS) is required. For children social care research which involves four or more local authorities, approval from the Association of Directors of Children's Service (ADCS) is required.	☐Yes ☐No ☐NA
5.3 Do you require a DBS check to conduct the study? This is required for projects involving interactions with children, young people, and	☐Yes ☐No ☐NA

adults in social care.	
5.4 Have you been granted ethical approval from the relevant body?	☐Yes ☐No ☐NA
5.5 Have you conducted a data ethics assessment? Researchers are encouraged to use ODI's Data Ethics Assessment Form to record how data ethics issues will be measured, monitored, discussed, and acted upon.	☐Yes ☐No ☐NA
5.6 Will you require a Data Sharing Agreement with GCC? If you are requesting direct access to personal or confidential data held by GCC for research purposes, you are expected to establish a formal Data Sharing Agreement (DSA) between GCC and the researcher or their host organisation. The DSA template available in Appendix G of GCC Research Governance Framework can be used and adapted to the research project.	☐Yes ☐No ☐NA
5.7 Have you conducted a DPIA or will you need to conduct one? If the Self-Assessment Risk Tool indicates high risk and/or you are seeking direct access to personal and/or confidential data held by GCC, you are expected to complete a Data Protection Impact Assessment (DPIA) and submit it alongside the application. The DPIA template available in Appendix F of GCC Research Governance Framework can be used but GCC will also accept external DPIAs.	☐Yes ☐No ☐NA
5.8 Does the research team hold liability insurance? All individuals or organisations applying to use council resources for research purposes must provide proof of liability insurance that covers their project and proposed activities. Research undertaken by GCC employees as part of their role is covered under the Council's Employee Code of Conduct and existing insurance, provided they have applied for and been granted research approval.	☐Yes ☐No ☐NA

5.9 If you have not sought ethical approval, explain why below and indicate which ethical guidelines you will comply with.
5.10 If you have not conducted a DPIA or you don't need to conduct one, explain why below.

6. AIMS & METHODOLOGY

This section asks you to provide an overview of your study's aims and methodology. If you are submitting the research or evaluation proposal/protocol as part of your supporting documents, you may provide a brief summary here and refer to the full details by citing the relevant page numbers or section headings.

6.1 Research question and aims.
6.2 Rationale. Why are you conducting this research?
6.3 Methods. If accessing existing data, what data and from what sources? If you are collecting new data, what methods will be used?

6.4 Participants. Please provide details about the participants for your research or evaluation. Who will be involved? Are they vulnerable? How will they be recruited, how will you obtain informed consent, and how will they be able to withdraw? Will participation be incentivised in any way?
6.5 Analysis. How will you analyse the data? (e.g. thematic analysis; statistical analysis etc).

7. SAFEGUARDING & INCLUSION

This section asks you to provide information about ethics. If you have completed an ethics application and you are submitting it as part of your supporting documents, you may provide a summary here and refer to the full details by citing the relevant page numbers or section headings.

7.1 Risks and mitigations. Outline any key risks to participants (including safeguarding risks), researchers, and to GCC (e.g., reputational risks) and how they will be mitigated
7.2 EDI. How have you considered equality issues (e.g., representation, accessibility, etc.) in your project, including the potential impacts on participants with protected characteristics?
7.3 Co production and public and community involvement. Please indicate whether your project involves co-production or any other public involvement and provide an overview

8. GDPR & DATA PROTECTION

This section asks you to provide information about data protection. If you have completed an ethics application and/or a DPIA and are submitting it as part of your supporting documents, you may provide a summary here and refer to the full details by citing the relevant page numbers or section headings.

8.1 What type of data will be collected (e.g., personal, special category, criminal conviction data), who will have access, and how long will it be kept?
8.2 How will the data be stored, protected, and managed during and after the project?
8.3 Will personal and special category data be shared between organisations? How will data be shared securely?
8.4 What anonymisation and pseudonymisation technique will you be using?

9. DISSEMINATION

9.1 Outputs. What outputs are expected from this project, how will they be disseminated, and who will they be shared with? Will they be shared with participants and GCC?

9.2 Risks. How have you considered equality issues in your research's potential findings, including the potential positive and negative impacts your project may have on individuals with protected characteristics and on the council (e.g. reputational risk)? How will you mitigate these risks?

10. SUPPORTING DOCUMENTS

Please indicate which documents you are submitting alongside this Research Application form. Tick N.A (not applicable) for those documents that are not required for your study.

Document	Attached	Comments (if any)
Self-Assessment Risk Tool (required for all) The level of risk will determine for route needed for approval. Completion of the self-assessment risk tool is required for all submissions.	☐Yes ☐No ☐NA	
Data Protection Impact Assessment (DPIA) Required for high-risk research projects and for projects that seek direct access to personal/confidential information held by GCC	☐Yes ☐No ☐NA	
Study proposal / protocol	☐Yes ☐No ☐NA	
Ethical application and approval	☐Yes ☐No ☐NA	
ODI's Data Ethics Assessment Form	☐Yes ☐No ☐NA	
ADCS or ADAS application/approval	☐Yes ☐No ☐NA	
Data Sharing Agreement	☐Yes ☐No ☐NA	
DBS approval	☐Yes ☐No ☐NA	
Consent forms / assent forms for participants	☐Yes ☐No ☐NA	
Participation information sheet	☐Yes ☐No ☐NA	
Privacy notices	☐Yes ☐No ☐NA	
Copies of any questionnaires/surveys	☐Yes ☐No ☐NA	
Interview/focus group questions	☐Yes ☐No ☐NA	
Researcher(s) liability insurance	☐Yes ☐No ☐NA	

SIGNATURE & DATE

APPLICANT		
Name:	**Signature:**	**Date:**
SUPERVISOR / LINE MANAGER / RESEARCH LEAD		
Name:	**Signature:**	**Date:**

D. Self-Assessment Risk Tool[8]

Please complete the following Self-Assessment Risk Tool and submit alongside your Research Application Form and supporting document to GCC Research Governance Coordinators at DPO@gloucestershire.gov.uk . Both forms can be downloaded from the research governance page on the Research & Evaluation intranet site and the dedicated research page on GCC's public facing website .

Project title:					
Applicant name:		**Email:**		**Date:**	

For each area, assess the level of risk by ticking the relevant box and assigning a corresponding score of 1 for low risk, 2 for medium risk, or 3 for high risk.

#	Risk area	Low risk (Score: 1)		Medium risk (Score: 2)		High risk (Score: 3)		Score
1	**Research participants' vulnerability**	Informed consent and ability to withdraw from study fully possible.	☐	Informed consent and ability to withdraw from the study is possible with support (e.g. from advocates, translators / interpreters, signers or technology).	☐	Participants are unable to consent or withdraw from the study due to age or incapacity, language issues, literacy issues, sensory or speech impairments.	☐	
2	**Researcher(s) experience**	Researcher(s) are well qualified with experience and knowledge of the topic of investigation, the participants, and research methods to be used.	☐	Researcher(s) reasonably well qualified with some experience and knowledge of two of the following three factors: topic of investigation, the participants or research methods to be used.	☐	Researcher(s) not well qualified with little or no experience of topic under investigation, the participants or the methods to be used e.g. undergraduate researcher, student project.	☐	
3	**Nature of information being sought and/or collected**	The information being sought or collected is not personal or special category data and instead focuses on, for example, opinions about a received service	☐	The information being sought or collected includes personal data (e.g., names, contact details) and items likely to be considered sensitive by some people, e.g. ethnicity, religion, income, age.	☐	The information being sought is 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, social service history, mental health history.	☐	

[8] This self-assessment risk tool was originally developed by North Yorkshire Council and later adapted by Havering Council. It has since been incorporated into our research governance framework and further adapted to the GCC context through the addition of a risk scoring component.

4	**Information security**	The topic and kinds of information being sought do not focus on personal information at all, no data subject can be identified and therefore GCC would not be at risk if data was disclosed or accessed.	☐	Secondary data is used but may include a limited amount of contact with people drawing on services, their family or carers, or staff to collect primary data. Data subjects could be identified and face personal detriment, and GCC could face adverse publicity if information was disclosed or access without appropriate permissions.	☐	Highly personal and/or sensitive information could be disclosed/accessed if appropriate information security measures are not in place. Data subjects could be identified and face personal detriment, and GCC could face adverse publicity, as well as lawsuits from data subjects affected.	☐	
5	**Methods / nature of data collection**	No face-to-face interaction between researcher and participant	☐	Some face-to-face contact and interaction for limited amounts of time (e.g., a one-off interview)	☐	High level of face-to-face interaction between investigator and participant e.g. extended fieldwork, observations.	☐	
6	**Quality of research design**	The methods are appropriate as they have been used successfully on similar, or the same, project previously and/or advice has been sought with regards to methods. The necessary resources are available to undertake the research.	☐	It is believed that the methods are the most appropriate for the study, although it is not known whether they have been used successfully in a similar project. Advice has been sought and resource implications considered.	☐	It is not known whether the methods are appropriate for the study and no advice has been sought concerning the methods. No additional resources have been made available to undertake the research.	☐	
7	**Relationship between researcher and participants**	The participants are unknown to the researcher.	☐	Limited information about the participants will be available to the researcher.	☐	Participants are personally known to the researcher and the researcher may have other duties or responsibilities towards all or some of the participants which may create a potential conflict of interest.	☐	
8	**Level of privacy for participants**	Participants are anonymous and no identifiable information will be used or collected as part of the study, or participants have the	☐	All the information collected will remain confidential, although identifiable information will be collected as part of the study.	☐	Details of the information collected and participants involved will not remain confidential.	☐	

		option to remain anonymous if they so wish.						
9	**Sensitivity of topic**	The study is not considered to be sensitive.	☐	Parts of the study may be sensitive.	☐	Study is likely to be extremely sensitive	☐	
10	**Reputational Risk to the council**	The study poses little reputational risk to GCC, as the council is unlikely to be identified and the research covers non-sensitive topics that are unlikely to generate public complaints, criticism, or negative media interest.	☐	The study presents a moderate reputational risk to the council, as the council may be indirectly identifiable and the research involves topics that could raise some concern or questions from the public or other stakeholders. While widespread complaints or media interest are unlikely, there is a reasonable possibility of limited negative feedback or scrutiny if the findings are misunderstood or not well-communicated. .	☐	The study presents a high reputational risk to the council, as the council is likely to be identifiable and the research involves sensitive or potentially contentious topics. There is a significant possibility that the findings could attract public concern, complaints, or negative media interest, and any misinterpretation or criticism may lead to reputational harm or undermine trust in the council.	☐	
						TOTAL SCORE		

OVERALL RISK LEVEL	**LOW (Score: 10-15)**	☐	**MEDIUM (Score 16-24)**	☐	**High Score (25-30)**	☐
APPLICANTS' COMMENTS						

If the Self-Assessment Risk Tool indicates high risk and/or you are seeking direct access to personal and/or confidential data held by GCC, you are expected to complete a Data Protection Impact Assessment (DPIA) and submit it alongside your research application. The DPIA template available in Appendix F of GCC Research Governance framework but GCC will also accept external DPIAs.

SIGNED & DATED		
Name:	**Signature:**	**Date:**

E. Research Review Form[9]

GCC staff involved in reviewing applications to use council resources for research or evaluation purposes are expected to complete this form and return it to GCC's Research Governance Coordinators at DPO@gloucestershire.gov.uk .

The Research Review Form can be downloaded from the research governance page on the Research & Evaluation intranet site and the dedicated research page on GCC's public facing website .

Applicant name	
Applicant organisation	
Title of Study	
Risk level (as indicated in the self-assessment risk tool submitted by the applicant)	
Date of Request	
Date of Review	
Reviewing Panel (names & roles)	
Statement of Conflict of Interest	

1. GENERAL

1.1 Does the proposal include the name and contact details of the lead, the name and contact details of the person overseeing the work, and information about the funder?	**☐Yes ☐No**
Comments, if any:	
1.2 Is the purpose of the study clearly stated?	**☐Yes ☐No**
Comments, if any:	
1.3 Does the proposal demonstrate an appropriate use of resources?	**☐Yes ☐No**
Comments, if any:	
1.4 Do the methods align with the research questions/objectives?	**☐Yes ☐No**
Comments, if any:	
1.5 Are the necessary supporting documents accompanying the application?	**☐Yes ☐No**
Comments, if any:	

2. BENEFITS

2.1 Does the proposed project align with the ambitions/priorities of the Council?	**☐Yes ☐No**
Comments, if any:	
2.2 Is GCC already involved in research on this topic? You can refer to GCC's	**☐Yes ☐No**

[9] This form was developed by adapting templates originally designed and implemented by Havering Council and North Yorkshire Council.

Research Register or ask GCC's Research Governance Coordinators at DPO@gloucestershire.gov.uk)	
Comments, if any:	
2.3 Will this project benefit GCC?	**☐Yes ☐No**
Comments, if any:	
2.4 Will this project benefit communities or other stakeholders?	**☐Yes ☐No**
Comments, if any:	
2.5 Will the proposed project add value to the knowledge/evidence base, either academically or locally?	**☐Yes ☐No**
Comments:	

3. ASK AND CAPACITY

3.1 What is the request being made of GCC?
3.2 Which staff members need to be involved in the project in order to meet the request? If any
3.3 What would their role be? (e.g., supporting research activity, participating in the research, assisting with data collection, assisting with recruitment)
3.4 Is this request proportionate, and can it be reasonably accommodated?

5. RISKS

5.1 Does the applicant and/or the reviewing panel identify any concerns regarding:	
a. Risks to participants	☐Yes ☐No
b. Researcher(s) competence	☐Yes ☐No
c. Research funder	☐Yes ☐No
d. Conflict of interest (both for researchers and GCC, should GCC be involved)	☐Yes ☐No
e. Reputational risk for GCC	☐Yes ☐No
f. Data management and data protection	☐Yes ☐No
g. Research ethics	☐Yes ☐No
h. Consideration of equality issues (e.g., representation, accessibility, diversity)	☐Yes ☐No
Comments, if any:	
5.2 Have appropriate measures been put in place to mitigate the risks and are these satisfactory?	

6. RECOMMENDATION FOR DIRECTORATE LEADERSHIP

*Complete this section only where the project has been assessed as **high risk and high benefit**. First, identify the appropriate directorate leadership responsible for making the final decision. Then state your recommendation and the reasons supporting it. Once the recommendation has been added, send the completed section to the identified directorate leadership.*

Directorate leadership	

RECOMMENDATION	**RATIONALE**
☐ **Approve without conditions**	
☐ **Approve with conditions**	
☐ **Amend**	
☐ **Reject**	

7. OUTCOME

Please tick the relevant box and delete the outcomes that do not apply.

APPROVE ☐	
Rationale	
Is approval conditional on any specific requirements or provisions?	
GCC staff matched to the project (name, role, team, email)	
Next step	A member of the review panel will communicate the outcome to the applicant and the GCC Research Governance Coordinators will update GCC's Research Register

AMEND ☐	
Rationale (e.g., specify any elements of the application that require amendment or any specific questions that must be addressed before the application can be fully assessed)	
Next step	A member of the review panel will communicate the outcome to the applicant, asking for the amendments or clarification outlined above.

REJECT ☐	
Rationale	
Next step	A member of the review panel will inform the applicant, and the Research Governance Coordinators will update GCC's Research Register

8. REVIEW PANEL SIGNATURES

Name	Date

To be completed if amendments or further information were requested

Please tick the relevant box and delete the outcomes that do not apply.

APPROVE ☐	
Rationale	
Is approval conditional on any specific requirements or provisions?	
GCC staff matched to the project (name, role, team, email)	
Next step	A member of the review panel will communicate the outcome to the applicant and the GCC Research Governance Coordinators will update GCC's Research Register

REJECT ☐	
Rationale	
Next step	A member of the review panel will inform the applicant, and the Research Governance Coordinators will update GCC's Research Register

SIGNED AND DATED:

Name	Date

F. DPIA form for research

The DPIA template for research can be downloaded from the research governance page on the Research & Evaluation intranet site and the dedicated research page on GCC's public facing website .

Data Protection Impact Assessment (DPIA)
[Insert Project Title]

Research Applicant Name	[please detail]
Date	[please detail]

1. Information Gathering

1.1 Reason for completing the DPIA

Self-Assessment Risk Score	[please detail]

Using the tick boxes below, indicate which risk areas scored high risk on your self-assessment risk tool.

☐Research participants' vulnerability
☐Quality of research design
☐Researchers experience
☐Relationship between researcher and participants
☐Nature of information being sought
☐Level of privacy for participants
☐Information Security
☐Sensitivity of topic
☐Methods/nature of data collection
☐Reputational risk to the council

1.2 Summary of Research Project

What does the processing of personal data aim to achieve? Include aims of the research and any benefits to the individuals and GCC as well as how you intend to mitigate any of the high risks.

1.3 Whose personal data is being processed?

Please describe the individuals you will be processing information about (e.g. staff, members of the public, people drawing on services etc)

1.4 Personal data

Please tick any of the below boxes to indicate the type(s) of personal data that is processed.

☐Title
☐Online identifier
☐Name
☐IP address
☐Address
☐Geolocation or tracking data

☐Contact information *(e.g. telephone number, email address etc.)*
☐District (council) of residence
☐Date of birth (or age)
☐Gender
☐Photograph
☐Case identifier *(such as case ref)*
☐National insurance number
☐NHS number
☐GP practice
☐Passport details
☐Driving licence details
☐Number plate
☐Recruitment information *(e.g. CV, work history, job references, etc.)*
☐Employee/payroll number
☐Occupation
☐Banking information
☐Eligibility or receipt of a benefit
☐Family, lifestyle and social circumstances
☐Experience of bullying
☐Relating to domestic abuse
☐Support network
☐Housing needs
☐Behavioural data *(i.e. diet, sleep, school attendance, physical activity, hygiene,)*
☐ Other: [please detail]

1.5 Special Category Data
Please select the relevant box(es) below:
☐None
☐Health and/or social care data
☐Racial or ethnic origin
☐Religious or philosophical beliefs
☐Person's sex life or sexual orientation
☐Political opinions
☐Trade union membership
☐Genetic data
☐Biometric data

1.6 Criminal Conviction/Offence Data
Will any criminal conviction or offence data be processed?
☐ Yes, criminal conviction data will be processed

[state number of individuals concerned, type of criminal conviction data and reasons/purpose for processing]

☐ No, criminal conviction data will not be processed

1.7 Personal Data Processing
Please describe in the table below, in detail, how the personal data will be processed. This will allow you to identify the data flow and help you understand all the processing involved.

How many people's data will be collected/used?	☐ 0 ☐ 100 individuals or less ☐ 101 to 1,000 individuals ☐ 1,001 to 10,000 individuals ☐ 10,001 individuals or more

Describe how you will collect/receive the personal data	[please state]
How and where will the data be stored?	[please state]
How will the data be kept up to date and accurate?	[please state]
How will the data be kept safe and secure?	[please state]
Who will the data be shared with and how will you share it?	[please state]
How will the data be destroyed or deleted at the end of the project?	[please state]
Will the data be processed in any additional way(s)?	[please state]
How long will you keep the data for?	[please state]

1.8 Compliance Mechanisms

Please indicate how you will compliance is ensured such as privacy information/leaflets, any additional data protection documentation such as legitimate interests' assessment etc.

[please detail]

2. Data Protection Compliance

2.1 Lawful Basis for Processing Personal Data (GDPR Article 6)

☐ **Article 6 1(a)** Data subject has given consent for processing

☐ **Article 6 1(b)** Processing is necessary for performance of a contract

☐ **Article 6 1(c)** Processing is necessary for compliance with a legal obligation.
This legal obligation is

[state applicable legislation that gives you this obligation]

☐ **Article 6 1(d)** Processing is necessary in order to protect vital interests

☐ **Article 6 1(e)** Processing is necessary for the performance of task carried out in the public interest.
The legislation mandating this Public Task is

[state applicable legislation]

Article 6 1(f) Processing is necessary for the purposes of legitimate interests. The following applies to this processing

☐ Disclosure to Public Bodies

☐ Safeguarding Vulnerable Individuals

☐ Crime prevention

☐ National security and public safety

☐ Other *(Legitimate Interests Assessment required)*

[Please include the date LIA was completed]

2.2 Conditions for Processing Special Category Data

a. UK GDPR condition(s) for processing special category data

☐ **Article 9 2(a)** Data subject has given explicit consent for processing

☐ **Article 9 2(b)** Processing is necessary in the field of employment and social security and social protection law

☐ **Article 9 2(c)** Processing is necessary in order to protect vital interests

☐ **Article 9 2(e)** Processing relates to personal data which are manifestly made public by the data subject

☐ **Article 9 2(f)** Processing is necessary for legal claims

☐ **Article 9 2(g)** Processing is necessary for reasons of substantial public interest

☐ **Article 9 2(h)** Processing is necessary for the provision and/or management of health and/or social care systems

☐ **Article 9 2(i)** Processing is necessary for reasons of public interest in the area of public health

☐ **Article 9 2(j)** Processing is necessary for archiving purposes in the public interest

b. DPA 2018 Schedule 1 condition(s) for processing special category data

☐ We meet the following condition of Schedule 1 of the Data Protection Act 2018. We process special category data as is necessary for:

[State relevant DPA 2018 condition]

2.3 Conditions for Processing Criminal Conviction Data (GDPR Article 10)

☐ We have identified an appropriate DPA 2018 Schedule 1 condition

2.4 Rights of Individuals (GDPR Articles 13 - 22)

☐ All relevant council staff, provider staff or contractors (i.e. those involved in the processing) are aware of the correct procedures for responding to data subject rights requests.

☐ Right to be **informed**

[State how you have met this right. For example, “a privacy notice has been created and is readily available and/or provided to data subjects”, and/or “there is a process for notifying the data subject when there is a fundamental change to the privacy of the individual, such as international transfer where that did not

exist before, or if you suffer a Data Breach such as the irreversible loss or corruption of their information."]

☐ Right to **withdraw consent** *(only applicable if consent is the lawful basis)*

[State how individuals are able to withdraw their consent.]

☐ Right to **access**

[State how data subjects can access the data held about them.]

☐ Right to **rectification**

[State how individuals can correct inaccuracies in information stored about them.]

☐ Right to **erasure** *(not applicable if processing under Public Task or Legal Obligation)*

[State how data subjects can request that their personal data is erased.]

☐ Right to **object**

[State how data subjects can object to the processing of their personal data.]

☐ Right to **restrict processing** *(If invoked, personal data can be stored, but not further processed)*

[State how you will ensure that any personal data held on an individual can be prevented from being used for further processing.]

☐ Right to **data portability** *(Only applicable if processing under Consent or Contract.)*

[State how data subjects can request to transmit data to a new Controller.]

☐ Rights in relation to **automated decision making and profiling**

[State if there is automated decision making or profiling and explain how you have considered the applicable extra considerations]

2.5 Compliance and Proportionality Measures.

a. Lawfulness, Fairness and Transparency

☐ The processing is lawful in that we have identified a lawful basis for processing the personal data (see above) and any other relevant conditions required for Special Category and Criminal Conviction Data

☐ We have ensured that the processing is fair in that we have considered all other rights and freedoms of data subjects.

☐ We have ensured that the processing is transparent by having a privacy notice in place which is provided to data subjects.

b. Purpose Limitation

☐ We have ensured that the data will only be processed for the purposes outlined in the research application.

c. Data Minimisation

☐ We have considered whether there are other possible ways to achieve the same outcome using less personal data

☐ Where possible, we used anonymised or pseudonymised data.

d. Accuracy

☐ The personal data can be assumed to be accurate as it is collected directly from the data subject.

☐ We have a process in place to ensure accuracy of the personal data

e. Storage Limitation

☐ We will ensure that the data is only held for as long as reasonably necessary before being securely destroyed.

f. Integrity and Confidentiality (Security)

☐ All individuals with access to the personal data have received appropriate training in handling personal and sensitive data

☐ Access to the personal data is restricted to only those who need it

2.6 Potential Privacy Impact of Processing

a. Collection of New Information

Will the project involve the collection of new information about people?

☐ The project **will** involve the collection of new information about people

☐ The project **will not** involve the collection of new information about people

b. Combining Anonymised Data Sources

☐ The project **will** involve combining anonymised data sources so individuals may be identifiable

[Outline what datasets will be combined and how individuals might be identifiable]

☐ The project **will not** involve combining anonymised data sources

c. Combining Datasets

Will the project combine datasets from different projects?

☐ The project **will** involve combining datasets from different projects

[Explain what the original projects are and whether individuals have been informed that this combining of datasets will take place]

☐ The project **will not** involve combining datasets from different projects

d. Disclosing Information to Others

Will information about individuals be disclosed to organisations/people who have not previously had access to this information?

☐ The project **will** involve disclosing information about individuals to other organisations/people who have not previously had access to this information

[Outline who the information will be shared with and why]

☐ The project **will not** involve disclosing information about individuals to other organisations/people who have not previously had access to this information

3. Third Parties

3.1 Stakeholder Consultation

Please indicate which stakeholders you have already consulted with

a. Business areas within the council

[Please state]

b. External stakeholders

[Please state]

3.2 Sharing Data

☐ Personal data will only be processed by the researcher and employees of the council

☐ Personal data will be shared with **local public bodies**

[Give details]

☐ Personal data will be shared with **public bodies on a national scale**
e.g. central government departments or bodies

[Give details]

☐ Personal data will be shared with **other external organisations** not listed above

[Give details]

4. Identify and Assess Risk

4.1 High Risk Processing

Please tick any of the below that apply and/or provide further information as indicated.

☐ Risk of identity theft, fraud or financial loss

☐ Risk of damage to reputation

☐ Risk of discrimination to any individuals

☐ Personal aspects are evaluated in order to create or use personal profiles, in particular analysing or predicting aspects concerning performance at work, economic situation, health, personal preferences, interests, reliability or behaviour.

☐ Risk of other physical, material or non-material damage, including any significant social or economic disadvantage

[please elaborate]

☐ Risk of loss of confidentiality of personal data protected by professional secrecy *(i.e. social care information)*

☐ Risk of unauthorised reversal of pseudonymisation

☐ Processing of personal data relating to a vulnerable natural person or child.

☐ Processing of special category personal data.

☐ Processing involves a large amount of personal data and/or affects a large number of data subjects.

☐ Risk of inability to honour individuals' data protection rights

[please elaborate]

☐ Special category data is inferred, due to the type of service, e.g. provision of services for those with disabilities.

☐ Other risk to an individuals' rights and freedoms

[please elaborate]

5. Certification

I confirm, to the best of my knowledge:

- this DPIA is accurate and complete and the intended processing has been fully described.
- The risks to individuals have been appropriately identified, assessed and controlled.
- I understand my ongoing responsibly to ensure that the processing complies with data protection legislation and that this DPIA needs to be updated and reviewed where there are material changes.

Name	[add]
Position	[add]
Date	[add]

G. Research DSA template agreement

The DSA template for research can be downloaded from the research governance page on the Research & Evaluation intranet site and the dedicated research page on GCC's public facing website.

More info **gloucestershire.gov.uk**

Gloucestershire