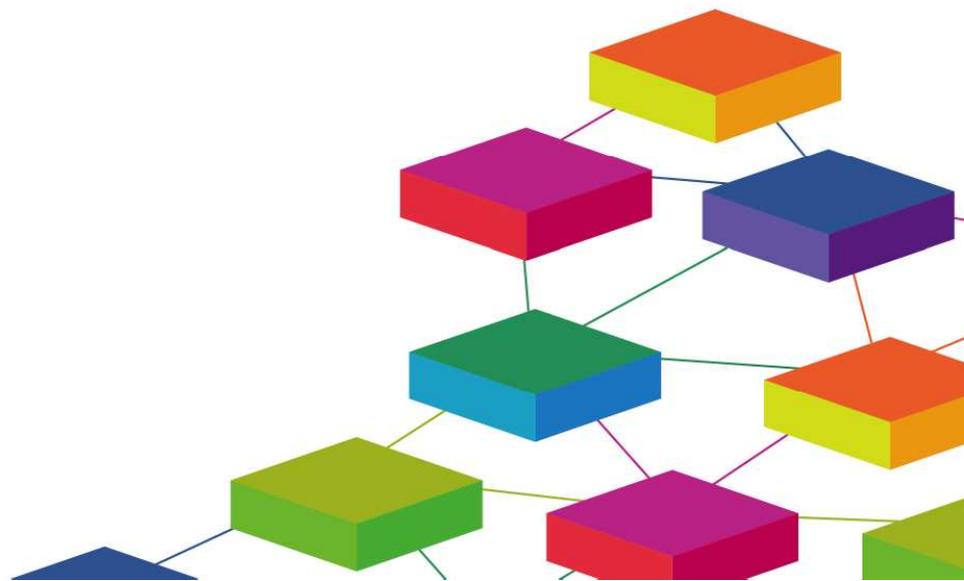


CONSUMER DATA RESEARCH CENTRE

RESEARCH APPROVALS PROCESS GUIDELINES Including Research Approvals Group Terms of Reference

Version 8.0



CDRC RESEARCH APPROVALS GUIDELINES (including RAG ToR)

1. Scope

The aim of this document is to define the role and remit of the Consumer Data Research Centre's Research Approvals Group (RAG or Group) within the Centre's research approvals process. This includes describing where the RAG sits within the Centre's governance structure and detailing the operational procedures for the Group.

2. Description

The Universities of Leeds and University College London with the Universities of Liverpool and Oxford have been funded under the ESRC Big Data Network: Phase 2 initiative to create the Consumer Data Research Centre (CDRC or Centre). The Centre aims to produce a three-tier data service with a safe and secure data infrastructure to collect, collate and analyse consumer data for public benefit, whilst protecting privacy. The Centre will: provide services to enable research access to business data to academics and industrial stakeholders; act as a centre of expertise in consumer data; conduct an innovative programme of research; and stimulate a programme of knowledge exchange and training in data analytics.

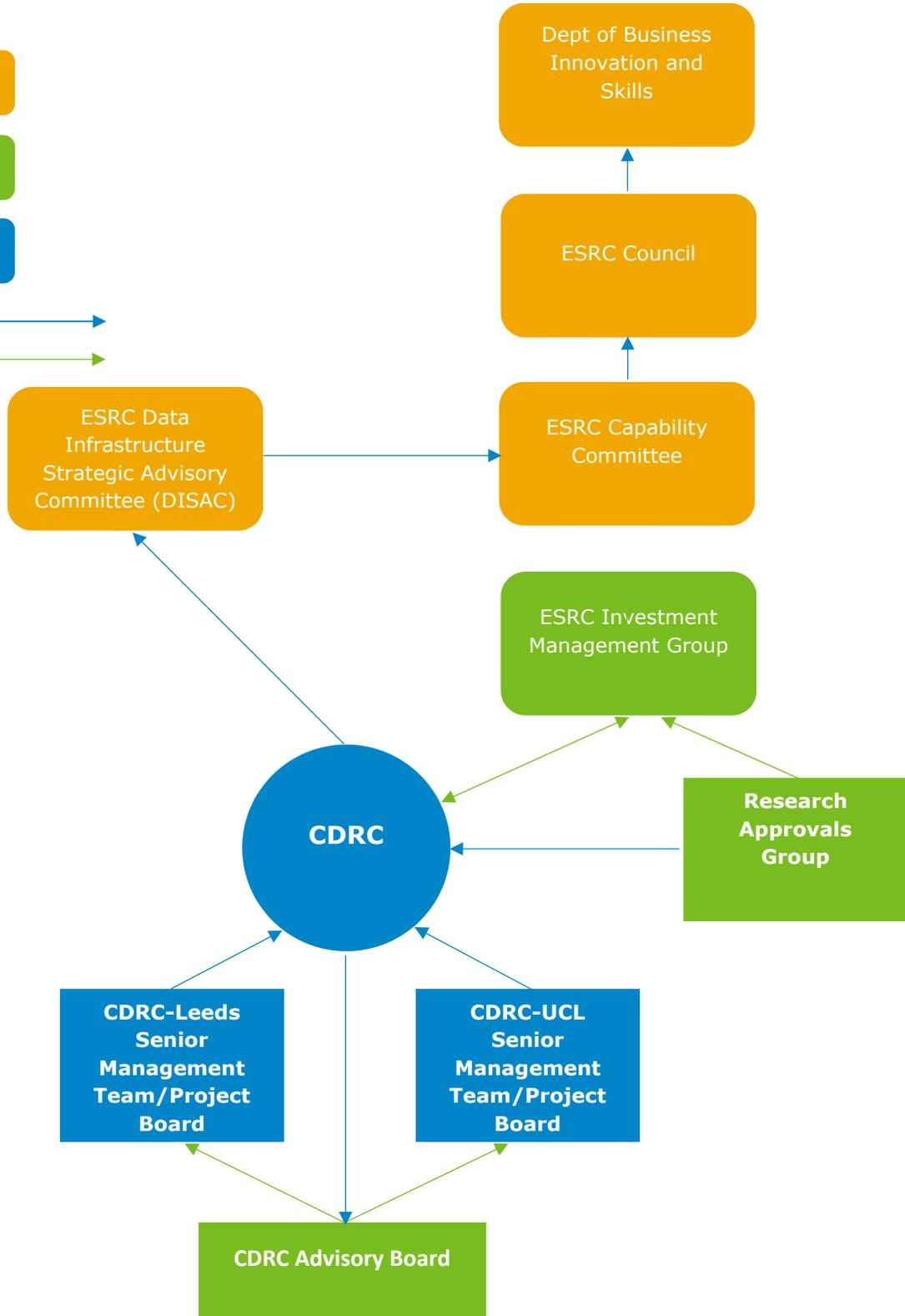
The RAG will play a key role in ensuring the quality, public benefit and/or scientific merit of research being conducted through the Centre. It will typically consider applications remotely. The process has been designed to be lightweight but robust, enabling timely decisions on user applications.

3. Governance

It is an ESRC requirement that the use of the CDRC Safeguarded and CDRC Secure services be permitted independently of the Centre Senior Management Teams¹ (SMT). The RAG will fulfil this role with membership comprising the Chair of the CDRC Advisory Board, independent academics in the research field, and a CDRC Data Scientist (DS) in an ex-officio capacity. The Data Partner(s) (DP) involved in the project will be invited to join the RAG as co-opted members, but will review proposals in advance of other RAG members in order that permission for the use of data is determined at the earliest possible stage. The RAG's composition will ensure that it has expertise in research design and analysis, and in research ethics, as well as having representatives of policy interests. The RAG will report back on decisions made to the CDRC who will communicate these to each prospective user.

¹ CDRC-UCL Senior Management Team and CDRC-Leeds Senior Management Team

KEY



4. The Role of RAG within CDRC's Research Approvals Process

The role of the RAG within the research approvals process is to provide independent and transparent assessments of applications by researchers for access to data through both the CDRC Safeguarded and CDRC Secure services.

Applications for use of Safeguarded and Controlled Data

Applicants will submit an initial project proposal to the CDRC who will assess whether the project fits the Centre's remit and whether the DP(s) are likely to approve the use of their data for this purpose. The DP is notified if a Non-Disclosure Agreement is required or if there is a specific query. The applicant will then be invited to submit a full proposal and be allocated a Centre Data Scientist (DS) to act as an advocate for the project. Once completed, the proposal documentation will be reviewed by the SMT and DP. The former will be required to comment on the resource implications and the practical feasibility of the proposed project, while the latter will be asked to approve use of the data and supply any stipulations they may have. A DP can reject an application where they do not consent to the use of the data for a particular research purpose.

Safeguarded Data

Once approved by the DP, a proposal is then forwarded to the RAG Chair, or their nominee, to review in order to monitor use and guard against misuse or misinterpretation of the data. Permission to use this data will not normally be withheld.

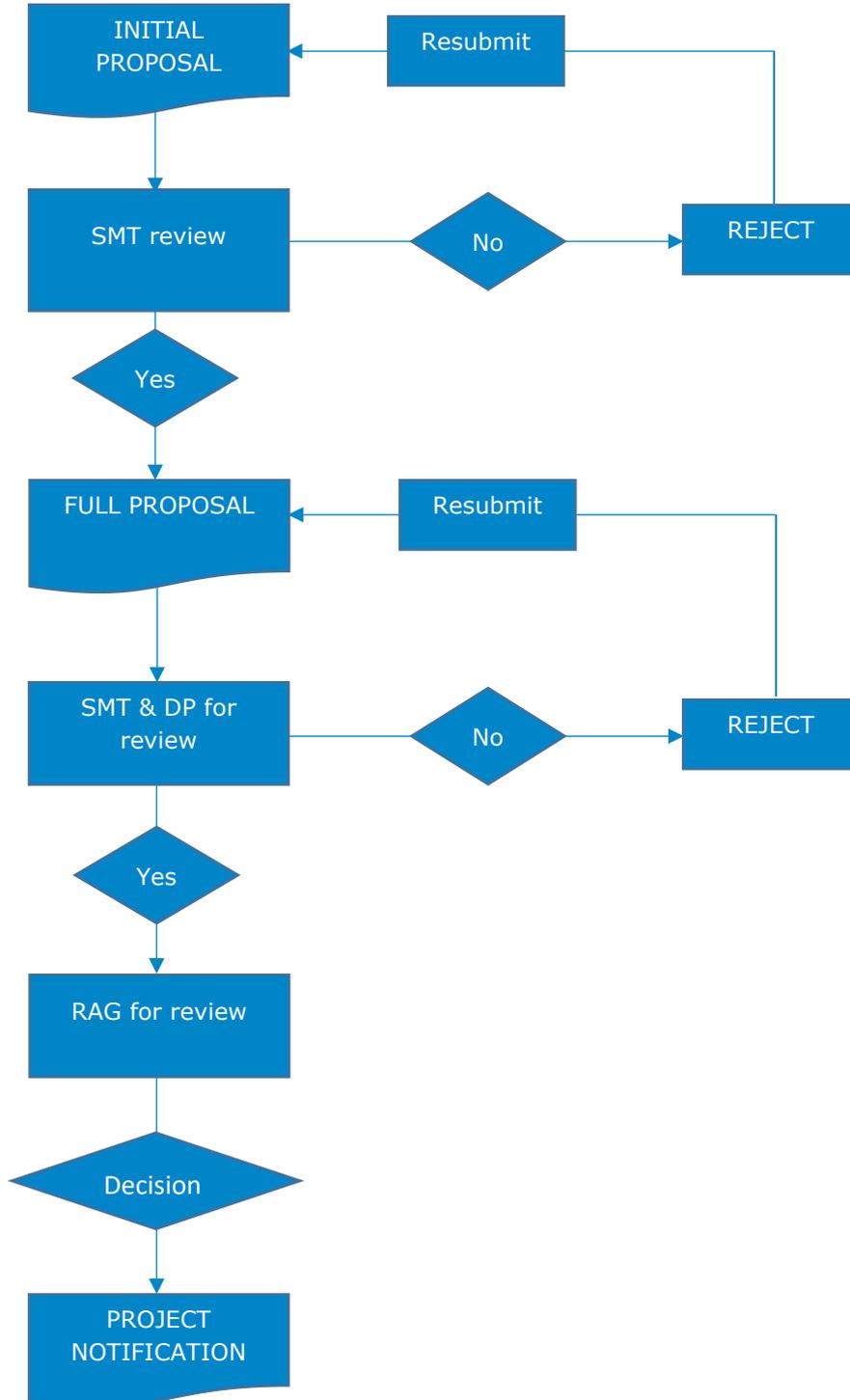
Data Partner stipulations for some safeguarded data may require full review as for controlled data. Where this is the case, this will be stated in the terms of use on the data listing.

Controlled Data

If use of the data is approved by the DP, the proposal will then be forwarded to two independent social science academic reviewers who will review the proposal based on a set of standard evaluation criteria (listed below). The RAG Chair will be responsible for overseeing the review process and make the final decision. If required, they will co-ordinate any follow up online discussion along with the CDRC. The assigned DS will be available to the Group to address any queries or concerns, but will take no part in the decision making process.

All RAG members must keep all details of Project Proposals and Data Partner details confidential.

Research Approvals Process



Criteria for Approval

To receive RAG approval, project proposals must demonstrate:

- **Scientific advancement** – how the project has the potential to advance scientific knowledge, understanding and/or methods using consumer data;
- **Public good** – how the project has the potential to provide insight and/or solutions that could benefit society;
- **Privacy and ethics** – the potential privacy impacts or risks, and wider ethical considerations relating to the project
- **Project Design and Methods** – how the project will be conducted and who will be involved with a focus on demonstrating project feasibility.
- **Cost and resources issues** – what impact the project is likely to have on CDRC resources, including CDRC staff time and use of infrastructure, as well as any data acquisition costs. Resource requirements should be justified.

Approval will not be granted without evidence that the applicant has obtained or is seeking ethical approval for the research through their institution, or has supplied justification that these are not applicable. For non-academic projects, these requirements will be assessed by the CDRC institution at which the data will be accessed and analysed.

4. RAG Terms of Reference

The RAG will:

- Provide an independent and transparent assessment of applications by researchers for access to data through both the CDRC Safeguarded and CDRC Secure services. It will:
 - Assess proposals based on the CDRC Criteria for Approval
 - Provide referee comments to RAG Chair using RAG Review document
 - Carry out online discussion between its members (if required)
 - Assign each proposal to one of the following categories
 - Recommended for data service
 - Recommended for data service subject to minor changes or minor additional conditions
 - Not recommended for data service in current form but invited to resubmit a revised application
 - Not recommended for data service
 - Referred to other Centres in the Big Data Network or other ESRC data investments
 - List any required stipulations to project proposal with explanation
 - Provide justifications of its decisions, which may include guidance to researchers on revisions to aid re-submission
 - Chair to report Group's decisions to CDRC for onward communication to applicants using Project Notification document

- Make decisions within 15 working days of the date of submission. If a RAG member is unable to complete the review in this period they will notify the CDRC's data scientist within 5 days. A quorum of 2 members for safeguarded data applications and 3 members for controlled data applications, which must include the data partner, will be required to make a decision. A majority decision will be accepted with the Chair to have a casting vote in the case of a tied decision.
- Offer independence in judgements and declare any potential conflicts of interest. In making assessments, data providers should remain cognisant of the CDRC's mission to broaden the user base for all legitimate research applications.

CDRC staff will provide RAG with:

- The applicant's research proposal application, including ethics approval or justification as to why these are not required
- SMT comments on the feasibility of the study and implications for CDRC infrastructure and existing resources
- The DP(s) decision on use of their data for project
- The contact details of the assigned data scientist and member of CDRC SMT who will be available to provide any further information or guidance but will not be involved in the decision making process
- A project proposal review document for submission to the RAG Chair
- A Project Notification document for completion by the RAG Chair to convey RAG's decision to the CDRC and applicant including any stipulations from RAG and/or DP(s)
- A continuously updated log of all RAG's decisions. RAG decisions will be reported to the ESRC's DISAC as part of the tri-annual reporting process and to the Advisory Board as part of the End Stage reports.

5. Membership

Name	Organisation	Role	Background	Role on RAG
Kim Cassidy	Nottingham Trent University, College of Business Law & Social Sciences, Nottingham Business School	Professor of Services Marketing	Academic: Services marketing and consumer behaviour	Member (Chair)
David Ashby	Doctor Ashby Limited	Director	Health information (Lay Member, Ealing CCG)	Member
Vincent Muller	University of Leeds, Inter-Disciplinary Ethics Applied Centre	Academic	Ethics	Member

Academics	A pool of UK social science academics		From relevant academic background/experience in research methodology	Member
Data Provider(s) (DP)		Supply of primary or value added dataset	Dependent upon dataset (business, value added reseller, etc.)	Co-opted member(s)
Senior Management Team (SMT)	CDRC	To provide information on project feasibility and resource implications	Academic/professional	Advisory Role
Data Scientist (DS)	CDRC	Technical advice on application, not involved in decision making process	Academic/professional	Advisory Role