

1. Introduction

1.1. The purpose of the Research Governance Framework is to ensure that research or studies involving Parole Board members or data is conducted ethically and is of benefit to the Parole Board, the victims, and prisoners with whom we work, and the wider parole system. We define 'research involving the Parole Board' as including any work that involves collecting information for research and/or evaluation purposes (as opposed to the routine collection of information for management, monitoring, or audit purposes) from or about individuals who may be prisoners that have been considered by the Board, victims of crime, or those who work for the Parole Board. This may, in some cases, also involve staff from within Her Majesty's Prison and Probation Service (HMPPS) and/or Prison Law Practitioners. This framework applies to all such research.

1.2. The Parole Board "Research Governance Group" ("the RGG") considers applications to undertake research involving the Parole Board. The RGG is made up of a Parole Board member with an academic background, representatives from the Senior Leadership Team and the Management Committee, an independent expert academic adviser, and is managed and supported by the Parole Board Policy Hub. As well as assessing research applications, the RGG will provide an important role in reviewing outcomes of approved research and how it can be used to shape future policy and identify priority areas for future research.

1.3. The formal basis on which The Parole Board is able to lawfully carry out its own research, allow interviews with its members, and share information relating to prisoners and victims, will be under-pinned by this framework and a publicly available Privacy Notice, which alerts relevant individuals on how we may use their data.

1.4. The Parole Board is not required to secure consent from individuals to process their data as the lawful basis is "legitimate Interest". The Information Commissioner's Office (ICO)¹ sets out that:

Legitimate interests: you can process personal data without consent if you need to do so for a genuine and legitimate reason (including commercial benefit) unless this is outweighed by the individual's rights and interests.

1.5. Where data sharing is required for the purposes of research, a Data Sharing Agreement (DSA) will need to be drawn up and agreed by both parties.

¹ [Legitimate interests | ICO](#)



2. The application process

2.1. Any person thinking of undertaking research within the Parole Board (considered an internal application), including members will, on making contact with the Parole Board, be offered the opportunity informally to discuss their idea or proposal with a member of the RGG. If they are then wishing to proceed with their application they should discuss the proposal with the Chief Operating Officer, in terms of formal support, and taking into account any ethical or resource implications.

2.2. Before making an application to the Parole Board's RGG, prospective applicants (internal and external) should first ensure that their proposal is approved by the institution or organisation at which they are based, where relevant, unless they are seeking an "in principle" approval (see 2.4 below). Applicants will also need to provide proposals on securing required ethical scrutiny, as appropriate, should the application receive approval.

2.3 Once these actions have been undertaken, prospective applicants should complete the Research Governance application form, available on the Parole Board website or, for internal applicants, on the members digital resource.

2.4. There may be instances where an applicant wishes to seek an agreement in principle, subject to the approvals set out in 2.2 above, or where the support of the Parole Board is being requested in submitting an application to a third party. The RGG will consider these on their individual merits, but this must be clearly indicated in the application.

2.5. The application form, research proposal (where appropriate) and any other supporting documents (for example, interview schedules, university ethics approval) should then be submitted to the Policy Hub who may, if necessary, seek clarification from the applicant.

2.6. The Policy Hub will then submit this application, with any views, to the RGG.

2.7. The RGG will decide, within a maximum of six weeks of receiving the request, to (a) approve the application, which may be "in principle" (b) refuse it, (c) ask for revisions, or (d) request further information. They may also make comments and suggestions to improve the research design.

2.8. The Policy Hub will inform the applicant in writing of the RGG's decision and any comments. If the application is approved, the applicant will be required to agree to certain conditions before commencing the research, which will include the following:

- The researcher must sign a Confidentiality and Information Assurance declaration, if approved;
- Timescales are agreed in advance of commencing the research or study;
- That the Parole Board is kept up to date on progress and findings of the research, and is given sight of the findings in advance of submission for publication;
- That the Parole Board is acknowledged in the final research report and any publications arising from it;

- That a full copy of the final report and any subsequent publications arising from it are provided to the Parole Board for consideration by the RGG for placement on the Parole Board website, subject to any restrictions;
- That, if requested, the researcher will write a short summary of the research for inclusion in a member newsletter within the Parole Board, or present findings at an event or conference;
- That the Policy Hub will be advised of any major changes to the research design or plan, for consideration as to whether re-approval from the RGG is required, that may require further ethical scrutiny.

2.9. No fieldwork, such as interviews with members or access to Parole Board data, may take place until approval has been received from the RGG.

2.10 If the application is unsuccessful or further information is required, the Policy Hub will contact the applicant to discuss how to take this forward.

3. Approval criteria

3.1 Internal applications (from members and staff) for interviews with Parole Board members will usually be supported; however, internal applications for contact with prisoners, victims, or access to case related data for research purposes from students at undergraduate or post-graduate level will require the applicant to contact the Policy Hub in the first instance for an informal discussion.

3.2. Applications from external undergraduate or masters students will not normally be supported. This is because such research is unlikely to be published externally and, consequently, unlikely to be of sufficient benefit to the Parole Board, and the prisoners and victims with whom we work, to justify our participation. However, such students may be considered appropriate to undertake small-scale studies that fit with Parole Board priorities, and students are welcome to seek clarification from the Parole Board if they have a specific study in mind.

3.3. To be approved by the RGG, research proposals must meet the following criteria:

- The proposed research is judged by the RGG to be robust and methodologically sound;
- The nature of the proposal makes Parole Board involvement necessary, within its resource capacity;
- The proposed research is relevant to the Parole Board's statutory functions and the findings are likely to be of benefit to the Parole Board and the prisoners and victims we work with. The application should explicitly set out what is being considered and how it will be of benefit to the Parole Board. Research may not be supported where the Parole Board considers it would duplicate existing or ongoing similar research;
- Parole Board participation in the research must be proportionate to the likely benefit derived from, and expected significance of, the research; applications may be declined because of the opportunity costs or other cost implications for the Parole Board that would arise from supporting

them. Any external projects should identify costs to the Parole Board of supporting the work, and these should be built into the initial funding bid;

- Ethical issues involved must be satisfied, and confidentiality and anonymity must be guaranteed; researchers must ensure that no Parole Board staff, prison and probation staff, prisoners, victims, or cases are identifiable in any research report. Where applicable, approval from the relevant university or other institution's ethics panel should be sought before an application is made to the Parole Board;
- If researchers wish to speak to prisoners, victims, and/or practitioners within HMPPS, or access prison establishments or probation service premises to undertake research, then they will need to have obtained any other necessary approvals for the research (see 3.4 below);
- Appropriate data security measures, which may require encrypted data storage, must be put in place by the researchers during the process and following completion of the research, which must be legally compliant (taking account of GDPR requirements), and comply with the Confidentiality and Information Assurance declaration.

3.4. Where research involves contact with parole eligible prisoners, victims involved in parole, or access to HMPPS personnel or data, the research should have national significance contributing to the evidence base of best practice. Such research will need to be approved by the Ministry of Justice National Research Committee (NRC) before being considered by the RGG. In some circumstances, RGG support may be sought ahead of approaching the NRC.

3.5. Where research involves the analysis of data owned by the Parole Board, a Data Sharing Agreement, as set out in 1.5 above, will need to be put in place.

3.5. All researchers proposing to work with research participants who lack, or may lack, capacity need to be aware of the need to comply with the Mental Capacity Act 2005 and its underlying principles, and the provisions relating to research. Any research with individuals (adults) who lack the capacity to consent must have the ethics of the research scrutinised and approved by an 'appropriate body'. An 'appropriate body' is defined in law. In England, the 'appropriate body' must be a research ethics committee recognised by the Secretary of State. In Wales, the 'appropriate body' must be a research ethics committee recognised by the Welsh Assembly Government. University ethics committees are *not* recognised as appropriate bodies under the terms of the Mental Capacity Act 2005.

3.6. Where applicants are unsure whether their proposal meets the criteria set out at paragraph 3.3, they may wish to contact the Policy Hub for an informal discussion before submitting their application.

Policy Owner	Faith Geary, Chief Operating Officer
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