

## Revising GDC’s research publication protocol

<b>Executive Director</b>	Stefan Czerniawski, Executive Director, Strategy
<b>Author(s)</b>	David Teeman, Head of Regulatory Intelligence
<b>Type of business</b>	For decision
<b>For Council only:</b>	Public session
<b>Issue</b>	Our approach to publishing research is slower and more cumbersome than it needs to be. This paper proposes a new approach where publication is the default and where decision making is proportionate to the nature of the research and its potential impact.
<b>Recommendation</b>	The Council is asked to approve the revised publication protocol.

### 1. Revising GDC’s research publication protocol

- 1.1 We currently have a cumbersome and sometimes very long drawn-out approach to publishing the research we undertake, with the result that the gap between completion of research and its publication can be many months. We can simplify and speed that up by taking more of a risk-based approach, and by starting with the basic principle that when we commission research we expect to publish the results, unless there is a serious shortfall in its quality.
- 1.2 This approach also separates out decisions about publication of the research itself – which in most cases should be automatic – from decisions about the exact timing of that publication and about any commentary or context setting GDC may wish to provide.
- 1.3 In developing the revised protocol, we have drawn heavily on the current Government Social Research publication protocol, and have based our approach on five core principles:
  - a. **Principle 1.** In line with GDC’s Information Governance Policy (2017), which states that, ‘the GDC seeks to regulate in an open, transparent and proportionate manner’ (Part 4, Principles). Unless subject to the exceptions explained in our policy, research commissioned by the GDC and/or undertaken by the GDC or contractors will be made publicly available. Further, the primary purpose of the research we commission and conduct is to inform decisions about policy and delivery, but it also plays a role in wider policy debate. Hence, subject to current policies, our underlying principle is the presumption that products from our research will be published.
  - b. **Principle 2.** There will be prompt release of all research and analysis. Research and analysis should be published promptly, with the normal maximum timeframe being 12 weeks from agreeing the final output. Within this period, the timing of the release can coincide with GDC announcements, decisions or events.

- c. **Principle 3.** Research and analysis must be released in a way that promotes public and stakeholder confidence and trust. Research outputs should be clearly based on the data collected. They should reflect the issues they have been designed to investigate, but findings should not be influenced by GDC's concerns relating to those issues. Research products should be kept clearly distinct from GDC staff and/or Council views, although their release can be timed to coincide with GDC announcements.
- d. **Principle 4.** In line with Principle 1, we should be transparent about the research projects we have commissioned and publish high-level information about them (i.e. focus of the research and successful contractor). Subject to exceptions explained in our Information Governance Policy, communication plans should be developed for all research that the GDC commissions and/or undertakes on its own behalf and the analysis we produce. Plans will be proportionate, reflecting the scope and nature of specific pieces of work. Owners of the research should indicate to colleagues and to the Council, at an early stage, intentions to publish in-house analytical outputs and also determine at an early stage whether the research under consideration is subject to any exemptions regarding transparency (for instance, taking into account our governance policy, FOI policy and legal frameworks).
- e. **Principle 5.** Responsibility for decisions relating to the release of research and analysis must be clear. The process for approving publication, which clearly delegates responsibilities, should be set out in an appropriate policy, approved by the Council.

1.4 The proposed protocol is attached at **Appendix 1**. Its aim is:

- to ensure that the potential risks and implications of publishing research findings are considered by the relevant individuals and teams at the appropriate time, enabling the GDC to respond in an informed and proportionate for each project (see process table in **Appendix 1**).
- to enable preparation of a suitable response to any risks or implications identified.
- to enable us to determine, at an appropriate time, how we can and should use the findings from research.
- to ensure that publication of research is not hindered or delayed by consideration of the matters above by decoupling decisions on publication of research from detailed plans on how we use research findings.
- to enable timely publication of research findings.

1.5 The protocol therefore outlines:

- the actions and responsibilities associated with providing the necessary assurances to the SLT, the Council and relevant committees that the implications of research have been properly understood by the organisation
- the steps that need to be taken to obtain approval for publication of research.

1.6 The protocol includes a table (the last page of the Appendix to this paper) which sets out the key decisions and responsibilities through the life cycle of a research project. The Council will retain its strategic role of assuring the overall approach to research and the research programme as a whole and will also continue to be the decision maker about the timing and context of publication for research where the findings are particularly significant, sensitive or contentious.

- 1.7 Relevant business leads working with the Regulatory Intelligence team have a shared responsibility to ensure that the protocol is followed, and in particular to ensure Council and Committees are kept informed of the progress of research and plans for publication on a proportionate basis.
- 2. Legal, policy and national considerations**
- 2.1 Our revised protocol retains the assumption that we will publish research unless it is considered not to be in the public interest to do so. Our revised protocol builds more structure into how we approach working with others to plan research and consider implications for GDC and our response to it.
- 3. Equality, diversity and privacy considerations**
- 3.1 EDI is the subject of a research action plan and is considered in relation to our programme and individual projects. Our revised research publication protocol includes stages for the engagement of colleagues and stakeholders in our end to end research process, including publication.
- 4. Risk considerations**
- 4.1 The new protocol enables the GDC to take a more proportionate and project-specific approach to how we publish our research and therefore places the GDC in a better position to consider risks during planning, research and publication phases. The Head of Regulatory Intelligence will monitor the implementation of the new protocol and identify and work to mitigate risks.
- 5. Resource considerations and CCP**
- 5.1 The revised protocol is designed to fit within existing resources and governance structures; therefore, we do not envisage a requirement for additional resources. The revised protocol seeks to more efficiently progress research publication, as well as to better harness the input of colleagues and others as part of BAU.
- 6. Monitoring and review**
- 6.1 We will monitor
- a. the time it takes from the sign off of a final research report to its publication.
  - b. via communications and feedback, the effectiveness of our approach to internal communication of implications.
  - c. the number of the GDC's published research responses and we will use analytics and other research to monitor the impact of research publications across a range of audience group.
- 6.2 Once the revised protocol is in place, the Head of the Policy and Research Programme and Head of Regulatory Intelligence propose to carry out a short review at the end of its first quarter of operation. The review will look at whether the new process is achieving the aims set out in this paper and whether the process proposed is working and to what extent it has helped reduce delays in publishing reports.
- 7. Development, consultation and decision trail**
- 7.1 The current protocol was adopted in 2016. As a result of difficulties experienced with operating that protocol, we undertook to review the process in Q4 of 2019. We committed to bring a paper before the SLT in Q1 2020 and did so. The proposed protocol has been developed in conjunction with colleagues in the Strategy directorate.

## **8. Next steps and communications**

- 8.1 Subject to Council approval, we will apply the new protocol to the publication of research completed from now on.

### **Appendices**

- a. Revised research publication protocol.

David Teeman, Head of Regulatory Intelligence  
Dteeman@gdc-uk.org  
Tel: 0207 167 6042

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## GDC research publication protocol (2020)

### 1 Principles

This research protocol is based on the following five principles:

- a. **Principle 1.** In line with GDC's Information Governance Policy (2017), which states that *The GDC seeks to regulate in an open, transparent and proportionate manner* (Part 4, Principles). Unless subject to the exceptions explained in our policy, research commissioned by the GDC and/or undertaken by the GDC or contractors will be made publicly available. Further, the primary purpose of the research we commission and conduct is to inform decisions about policy and delivery, but it also plays a role in wider policy debate. Hence, subject to current policies, our underlying principle is the presumption that products from our research will be published.
- b. **Principle 2.** There will be prompt release of all research and analysis. Research and analysis should be published promptly, with the normal maximum timeframe being 12 weeks from agreeing the final output. Within this period, the timing of the release can coincide with GDC announcements, decisions or events.
- c. **Principle 3.** Research and analysis must be released in a way that promotes public and stakeholder confidence and trust. Research outputs should be clearly based on the data collected. They should reflect the issues they have been designed to investigate, but findings should not be influenced by GDC's concerns relating to those issues. Research products should be kept clearly distinct from GDC staff and/or Council views, although their release can be timed to coincide with GDC announcements.
- d. **Principle 4.** In line with Principle 1, we should be transparent about the research projects we have commissioned and publish high-level information about them (i.e. focus of the research and successful contractor). Subject to exceptions explained in our Information Governance Policy, communication plans should be developed for all research that the GDC commissions and/or undertakes on our behalf and the analysis we produce. Plans will be proportionate, reflecting the scope and nature of specific pieces of work. Owners of the research should indicate to colleagues and to the Council, at an early stage, intentions to publish in-house analytical outputs and also determine at an early stage whether the research under consideration is subject to any exemptions regarding transparency (for instance, taking into account our governance policy, FOI policy and legal frameworks explained in our Governance policy).
- e. **Principle 5.** Responsibility for decisions relating to the release of research and analysis must be clear. The process for approving publication, which clearly delegates responsibilities, should be set out in an appropriate policy, approved by the Council.

## 2 What is in scope and what is not

### 2.1 In scope

For the purposes of this protocol, 'research and analysis' is defined as systematic data collection exercises using scientific methods, whether qualitative or quantitative, designed to generate robust information on an issue, policy or group of the population. The definition includes research and analysis to clarify or quantify a policy problem or to evaluate a policy and/or its delivery at pilot or full roll out stage. This will include, but is not restricted to:

- a. Research and analysis of quantitative data for the express purpose of answering a specific policy question (e.g. strategy development, policy development, policy delivery). This will include the analysis and interpretation of administrative data, analysis of specifically designed ad-hoc surveys and secondary analysis of continuous surveys and registration and fitness to practise data (subject to GDPR and privacy constraints and requirements).
- b. Secondary quantitative data analysis involving the interpretation of data following the statistical release of the main findings.
- c. Outputs from the analysis of qualitative data. These are data generated by any recognised qualitative method to generate robust data on the population(s) under study.
- d. Outputs from the evaluation of policy/delivery initiatives/pilots and trials.
- e. Outputs from literature reviews, rapid evidence assessments and systematic reviews.

## 2.2 Out of scope

This protocol does not cover informal evidence gathering exercises which are not designed to generate robust data and reports based on analysis.

In order to ensure consistency on the treatment of outputs the Head of Regulatory Intelligence and the research team will provide advice on whether this protocol applies. Staff should seek advice from the research team where necessary.

Specifically, outside the scope of this publication protocol are:

- a. Responses to freedom of information requests (FOIs).
- b. Management information.
- c. Briefing for Council or SLT that draws on research and analysis but addresses a specific information requirement.
- d. Briefing for policy/delivery colleagues that draws on research and analysis but addresses a specific information requirement.
- e. Analysis investigating the potential effects of different policy options.
- f. Dipstick/informal information gathering. Ad-hoc and informal evidence gathering which does not constitute a robust picture.
- g. Informal stakeholder consultation. Consulting or discussing policy ideas or issues with stakeholders, for example trade unions, employer's groups, or pressure or interest groups whose views may contribute to a policy decision.
- h. Analysis of unpublished/confidential papers and documents.

	Engage	Define	Commission	Monitor	Respond	Publish	Apply
What	Identify information gaps and research needs	Identify specific research requirement	Assign internal resource, procure external resource	Ensure research activity is monitored and any potential issues identified	Understand results and their implications. Identify any need for GDC response or context setting	Make the results public, together with a GDC response or other related material as appropriate	Ensure that research findings are embedded in policy and operational decision making
Who	GDC teams RI SLT	RI Business team	RI Business team Finance	RI Business team	RI Business team Comms	Comms RI Business team	Business team RI Internal Comms
Decision	What are our overall research needs and priorities?	What should the purpose, scale and scope of this project be?	Who should deliver the research, with highest VFM?	Is the research on track? Are emerging findings in line with expectations? Are any/all emerging findings covered by GDC’s publication policy exemptions?	Is the research of requisite quality? Does it raise immediate issues requiring a GDC response? What is the right level of publication authority? Are any/all findings covered by GDC’s publication policy exemptions?	When should the research be published? What context needs to be set for its publication <i>Level of sign off dependent on decision at previous stage</i>	What do we need to stop, start or do differently in the light of the research findings? Relevant governance processes will apply to any subsequent work
Sign off	Council	Business lead Head of Intelligence ED, Strategy	In line with procurement policy	Head of Intelligence	ED, Strategy or CEO or Council	ED, Strategy or CEO or Council	EMT

The first column in the table relates to the overall research programme, other columns relate to individual projects within the programme