Royal College of Art
Postgraduate Art & Design

Research Ethics Policy

Last updated 28 January 2025

1.   Introduction and Scope

1.1   The RCA's Research Ethics Policy is intended to support research activities undertaken by RCA academic staff and research students, enhancing research and research methodologies by encouraging careful consideration of and rigorous solutions to any ethical challenges that arise in the course of a research project.

1.3   Research requires ethical approval as part of good research governance. Good practice in research ethics and integrity is an important part of a culture that supports academic and research staff and students to produce excellent research. UKRI's Good research resource hub provides a useful overview of the key elements of an ethical research culture. Research ethics are important for a number of reasons:

   1.3.1   To protect the rights and welfare of research project participants, and to minimise the risk of physical and mental discomfort, harm and danger from research.

   1.3.2   To protect the rights of institutions and individual researchers to carry out legitimate research activities and investigations.

   1.3.3.   To help researchers think about their research more carefully, making it as robust and effective as possible.

   1.3.3   To comply with the terms of the institution's insurance policies covering research and researchers.

   1.3.4   To minimise the potential claims of negligence made against individual researchers, their institution, and any collaborating individual or organisation.

   1.3.5   To comply with the requirements of research funders and refereed journals.

   1.3.7   To avoid potential problems later on, by trying to ensure that any ethical issues are addressed before the research starts.

1.4   This ethics policy is intended to support the rigour, integrity and quality of all research undertaken at the RCA, whether by all academic research staff, doctoral research students or taught postgraduate students. This policy also applies to academic staff in their capacity as research student supervisors and in relation to taught programmes.

1.5   RCA staff and researchers should read this policy thoroughly prior to undertaking any research projects or

supervising other researchers and students. For an 'at-a-glance' summary, the Research Ethics Risk Category Assessment form is a good place to start, and the UK Research Integrity Office provides a wealth of resources. Please also refer to Annex 2 to see the ethics process flowchart.

1.6 Researchers should refer to this policy from the earliest phases of designing a research project, and ethics should remain a consideration throughout the development, conduct and dissemination of the research. It is rare for research to have no ethical implications, and this policy will support researchers to identify, consider and take appropriate steps to address any ethical considerations that arise. Staff supervising and supporting the work of others, including post-doctoral researchers and early career researchers as well as doctoral students, have a particular responsibility to ensure that good practice in research ethics is a core part of their approach.

1.7 Ethical issues arising in connection with RCA taught postgraduate student projects are subject to the same research ethics principles and procedures as research undertaken by academic and research staff and doctoral students. Please note that ethics approval processes for taught postgraduate students (MA, MDes, Med, MFA, MRes, and Graduate Diploma) are managed by the Education and Student Experience Office. Full details of the processes for taught postgraduate students can be found on the Ethics on Taught Programmes page of the RCA intranet.

1.8 This policy addresses ethical issues which may arise as RCA academic and research staff and research students undertake research projects across the whole range of activities, including research, knowledge exchange, executive education, consultancy, studio projects (including undertaking research and study visits in the UK or abroad), and running workshops and other events.

1.9 Work undertaken as part of a researcher's private professional practice and carried out outside their RCA contracted time is the responsibility of the individual in their private capacity and is not the responsibility of the RCA. Work of this nature should naturally not be carried out on RCA premises nor during RCA contractual obligations.

2.   Guiding Principles

2.1 It is important for researchers to acknowledge that all research has ethical considerations to varying degrees. Rather than being barriers to undertaking research, these considerations can strengthen the research, if addressed in a timely and proportionate manner. Researchers are not expected to eradicate all elements of risk in their projects, but rather should seek to understand and mitigate risks as far as possible.

2.2 This RCA is a signatory of the Concordat to Support Research Integrity and the Ethics Policy is aligned to the UK Research Integrity Office's *Code of Practice for Research* principles:

2.2.1 *Excellence*: Research should be conducted to the highest possible standard with the aim to produce and disseminate outputs of the highest quality.

2.2.2   *Honesty*: The College will work to create a research culture that encourages and supports honesty in research, and researchers should aim at all times to be honest in their own research, striving for accuracy and not engaging in misconduct.

2.2.3   *Integrity*: Comply with all legal and ethical requirements relevant to the fields of study involved in the research and avoid conflicts of interest, resolving where necessary.

2.2.4   *Co-operation*: The open exchange of ideas, research methods, data and results is encouraged (subject to considerations of confidentiality).

2.2.5   *Accountability*: Research should comply with any agreements and terms and conditions and should build in appropriate governance and transparency.

2.2.6   *Training and skills*: Training and development opportunities as well as necessary resources will be developed and offered to researchers. Researchers access the support and resources available to carry out their research and ensure they receive any additional specialist training and support as necessary.

2.2.7   *Safety*: The dignity, rights, safety and well-being of all involved in research are key, and research must avoid unreasonable risk or harm must be avoided. Should any concerns arise, this must be reported.

3.   Defining, Assessing and Managing Risk

3.1   Ethics should be considered at the earliest stage of developing the research project and activities, as the fundamental design of the project is likely to be influenced by ethical considerations.

3.2   Where possible, research should be designed to avoid any potential physical or non-physical (psychological) harm, pain, discomfort or stress to participants, people associated with the participants, or to the research team. Non-physical harm can include invasion of a participant's privacy, which leads to painful memories, or damage to their relationships, beliefs or social standing. Research should also be designed to minimise the risks to the environment and to animals.

3.3   It is unrealistic to expect that every research project should involve no risk. The expectation is, however, that the potential for risk should be assessed and understood, and, where it is not possible to avoid the risk, the researcher or research team should take every step possible to ensure that they have identified all likely risks, that the risk is minimal and appropriately managed, is proportionate to the benefits of the research, and that safeguards and monitoring are built into the research to address the risks and deal with any adverse results.

3.4   The following research participants and activities involve more than minimal risk and will therefore likely require submission to and approval by the RCA Research Ethics Committee through the Research Ethics Review Network or the Taught Students Ethics Sub Committee. These include research involving:

3.4.1   potentially vulnerable people or groups, e.g., children and young people, those with a learning disability or cognitive impairment, individuals in a dependent or unequal relationship, or people

who may be made vulnerable as a result of being exposed to the research;

3.4.2   participants who lack capacity to make decisions (must be approved by an appropriate body operating under the Mental Capacity Act 2005; see Annex 1);

3.4.3   participants where permission of a parent, carer or legal guardian is required;

3.4.4   participants in a dependent relationship with the researcher or gatekeeper;

3.4.5   sensitive topics;

3.4.6   administrative or controlled data, which requires appropriate approval for use of the datasets;

3.4.7   participants or others who may be identified in the research outputs or data generated;

3.4.8   sharing data or confidential information beyond what the participants originally consented to;

3.4.9   participants recruited or identified through the internet; the understanding of privacy in these settings is contentious and sensitive;

3.4.10   access to personal or special category information (see Annex 1 for Data Protection Act 2018);

3.4.11   intrusive interventions or data collection methods or which would induce stress, anxiety or humiliation;

3.4.12   deceased persons, body parts or other human elements (see Annex 1 for Human Tissue Act 2004);

3.4.13   deception or conducted without the valid and informed consent of the participants;

3.4.14   risk to the safety and wellbeing of the research team;

3.4.15   research that takes place outside the UK in areas where there may be issues around local practices and political sensitivities; and

3.4.16   research which falls under the Counter Terrorism Security Act 2015 (see Annex 1).

3.5   *Voluntary and informed consent*: Researchers should gain informed, properly recorded voluntary consent from human participants or from their gatekeepers (e.g., parents or caregivers). Information sheets, or other appropriate formats (e.g., audio or video), should be provided to possible participants which takes account of the needs of the targeted participants. Consent forms should consider whether confidentiality is necessary and can be guaranteed. The withdrawal of participation should also be considered, e.g., at what point participants can withdraw, at what point it is no longer possible to withdraw, and the method for withdrawing consent.

4.   Obligations and Responsibilities

4.1   Researchers should comply with the RCA Research Ethics Policy and recognise their responsibility to conduct their research with sound ethical consideration and to undertake an ethics assessment of risk when developing the research. Researchers should also make themselves familiar with other relevant RCA policies, such as the Data Management, Data Protection, Research Misconduct, and Health & Safety policies, and seek guidance where needed (see Annex 1).

4.2   Researchers must ensure that appropriate ethical clearance (from RCA as well as any other bodies and legislation as appropriate; please see Annex 1 for relevant bodies and legislation) has been secured. Failure to do so could result in being subject to RCA disciplinary procedures and could be contravening the ethical

requirements of other bodies (e.g., the Health Research Authority).

4.3   Academic staff involved in the supervision and development of postgraduate researchers should ensure they have the required training, time and resources to effectively supervise research students and ensure that they are aware of and fulfil their responsibilities with regards to the ethical consideration of postgraduate research. All new research supervisors should undertake the Epigeum Research Ethics training module within their first year supervising RCA doctoral students.

4.4   In demonstrating its commitment to both the Concordat to Support Research Integrity and the Career Development of Researchers, the College undertakes to support researchers in complying with their obligations and will seek to ensure that they are offered appropriate training to allow them to carry out their responsibilities in relation to conducting their own research with sound ethical considerations as well as when supervising research students.

4.5   Research students are required to review their ethics compliance at least annually as part of their Annual Progress Review process. Research students will need to complete the Epigeum Research Ethics training and upload their certificate of completion to their folder as part of the APR process.

4.6   The UK Research Integrity Office Code of Practice for Research suggests that 'when designing research projects, organisations and researchers should ensure that:

a)   the proposed research addresses pertinent question(s) relevant to the community or beneficiaries and is designed either to add to existing knowledge about the subject in question or to develop methods for research into it; context dependent concepts like repeatability, reproducibility, replicability, reliability, trustworthiness, credibility, authenticity and meta-research are of equal importance to establish quality;

b)   the design is justified and appropriate for the question(s) being asked, and addresses the most important potential sources of bias and criticism;

c)   the design and conduct of the study, including how the research outputs will be made, gathered, analysed, stored, and managed, are set out in detail in a prespecified research plan or where possible a protocol submitted to a registry. Open research practices are encouraged – see the UK Reproducibility Network (UKRN) resources on practising open research in different disciplines;

d)   all necessary skills and experience will be available, in the proposed research team or through collaboration with specialists in relevant fields;

e)   sufficient resources will be available and that these resources meet all relevant standards;

f)   agreements are in place to give appropriate acknowledgement for the intellectual and/or technical contributions to the research output; and

g)   any of the above issues are resolved as far as possible before the start of the research.'

4.7   It goes on to state that: 'Organisations (where appropriate) and researchers should conduct a risk assessment of the planned study to determine:

a) whether there are any ethical issues and whether ethics review is required;

b) the potential for risks to the organisation, the research, or the health, safety, wellbeing and mental health of researchers and research participants, the public, the environment, national security; and

c) what legal requirements govern the research.'

It also notes that 'Risk assessments should be a continuous process throughout the lifecycle of the research project to mitigate risks and communicate them to appropriate staff in the organisation.'

4.8 Where RCA researchers are working with researchers from other countries or are conducting research in other countries, they must ensure that they comply with the legal and ethical requirements in both the UK and the country(ies) where the research is taking place.

4.9 When travelling overseas for research, researchers should carry out a risk assessment using the College's Travel Risk Assessment guidance and process, and take into account advice from the UK Government's Foreign, Commonwealth & Development Office (FCDO) for the country and the specific region/city they will be visiting. Where the FCDO advises against travel to certain countries or regions, it is unlikely researchers will receive ethics approval to carry out their project in those locations.

4.10 Where RCA researchers are working with partners from other universities, industry, policy bodies, etc., special care should be taken to identify any issues that may arise from collaborative research and to agree in advance how these will be addressed. This can include agreeing the roles of each partner, issues relating to intellectual property, publication, and authorship. These can change throughout the course of the project, but care should be taken to address these issues at the start of the project.

4.11 If the research has been funded externally, researchers will also need to ensure that the ethics application and planned research comply with all requirements from the funder.

4.12 Researchers should be aware of and comply with legal, ethical, funding body and subject-related requirements for the collection, use and storage of data, including personal data. Particular attention should be paid to data protection legislation (see Annex 1 for Data Protection Act 2018). Researchers should consider confidentiality and the protection of intellectual property rights when working with third parties.[1]

4.13 Researchers should carefully consider whether information that is revealed through the course of the research project should be disclosed to participants or to third parties, and if so, how. This will need to be considered on a case-by-case basis, depending on the nature of the research and the information to be disclosed.

---

[1] UK Research Integrity Office (2023), Code of Practice for Research

5.   RCA Research Ethics Committee

5.1   Research Ethics and Integrity is governed by the RCA Research Ethics Committee, which reports to the College's Research & Innovation Committee and is supported by a Research Ethics Review Network (for ethics approvals, issues and good practice relating to academic and research staff projects and doctoral research students) and a Taught Students Ethics Sub-Committee (for ethical approvals and issues relating to taught postgraduate student work).

5.2   Terms of reference for these groups can be found here:
- Research Ethics Committee
- Research Ethics Review Network
- Taught Students Ethics Sub-Committee

6.   Ethics Approval Procedures

These are available on the College's intranet.

Annex 1: Information, Resources and Links

Association of Social Anthropologists (ASA) of the UK and Commonwealth Ethics:
https://www.theasa.org/ethics/

Counter Terrorism Security Act 2015:
https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted

Data Protection Act 2018:https://www.legislation.gov.uk/ukpga/2018/12/contents

Economic & Social Research Council (ESRC) Research Ethics Guidance:
https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/

Ethical Research Involving Children: http://childethics.com/

Health Research Authority (HRA) Research Ethics Service:
http://www.hra.nhs.uk/about-the-hra/our-committees/res/

HRA Ethics Decision Tool: http://hra-decisiontools.org.uk/ethics/

Human Tissue Act 2004: http://www.legislation.gov.uk/ukpga/2004/30/contents

Mental Capacity Act 2005: http://www.legislation.gov.uk/ukpga/2005/9/contents

Information Commissioner's Office, Guide to UK GDPR:
https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/

UKRI Good research resource hub:
https://www.ukri.org/manage-your-award/good-research-resource-hub/

UKRI Policy on the governance of good research practice (GRP)
https://www.ukri.org/publications/ukri-policy-on-the-governance-of-good-research-practice/

UK Research Integrity Office Code of Practice for Research
https://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf

Other RCA Policies

RCA Acceptable Use Policy (covering use of RCA technology)

RCA Health & Safety Policy, including guidance on Risk Assessments and Travel and Fieldwork

RCA Information and Data Management Policy

RCA Equality & Diversity Policies (Disability; Equality & Diversity; Race Equality; Religion and Belief; Sexual Orientation)

RCA Intellectual Property Rights Policy

RCA Due Diligence & Risk Assessment Guidance

Annex 2: Ethics procedure flowchart for staff and research students