Royal College of Art
Postgraduate Art & Design

Research Ethics Policy

1. Introduction and Scope

1.1 The RCA's Research Ethics Policy is intended to be supportive of research activities undertaken by RCA academic staff and research students. Rather than restricting research activities, the policy aims to enhance research and research methodologies through encouraging careful consideration and creative solutions to any challenges that arise.

1.2 The Royal College of Art is committed to producing excellent research, providing an outstanding and supportive research environment, and supporting the development of research students and early career researchers. We make a difference to the world by communicating our research findings and by undertaking collaborative projects with partners in other universities, in business and industry, and with government, charity and community partners.

1.3 Research requires ethical approval as part of good research governance. This is:

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

1.3.2 To protect your rights as a researcher to carry out legitimate research activities and investigations, as well as the reputation of the RCA for research conducted by its students and staff

1.3.3 To carry out your research under the RCA's insurance

1.3.4 To minimise the potential claims of negligence made against you, the RCA and any collaborating individual or organisation

1.3.5 Because, increasingly, refereed journals require evidence of ethical approval

1.3.6 Because a consideration of ethical issues is likely to help you think about your research more carefully and to help you to make your research more robust and effective

1.3.7 To avoid potential problems later on, by trying to ensure that the main ethical issues are addressed before the research starts.[1]

1.4 This ethics policy is intended to support the rigour and integrity of RCA research undertaken by all academic research staff and postgraduate research students (MRes, MPhil, PhD), including as part of knowledge exchange projects. This policy

1 Anglia Ruskin University (2016), *Code of Practice for Apply for Ethical Approval at Anglia Ruskin University,* p. 7, http://web.anglia.ac.uk/anet/rido/ethics/Ethics%20Forms/10%20-%20AC856_160908_Code%20of%20Practice%20for%20Applying%20for%20Ethical%20Approval_%2005.12.16%20Version%206.0.docx

also applies to academic staff in their capacity as research student supervisors. To avoid confusion, this policy will use the term ‘researcher’ throughout.

1.5 RCA researchers should read this policy thoroughly prior to undertaking any research projects or research supervision. For an ‘at-a-glance’ summary, the Stage 1 Ethics Form is a good place to start. Please also refer to Annex 2 to see the ethics process flowchart.

1.6 Ethical issues arising in connection with RCA MA student projects are subject to the same principles and procedures and will be considered by the Taught MA Ethics Sub-Committee. (See Annex 3 for Taught MA Ethics Processes. Please note training and approval processes for taught MA ethics is currently being agreed by the Academic Development Office and will be updated in this policy in due course.)

1.7 This policy addresses ethical issues which may arise as RCA academic research staff and research students and their supervisors 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.

1.8 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.

1.9 The RCA Research Ethics Policy should be read in conjunction with other related RCA policies, including the RCA Health & Safety Policy. (See Annex 1 for more information.)

1.10 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 mitigate risks as far as possible.

2.2 This policy’s guiding principles take inspiration from the UK Research Integrity Office’s *Code of Practice for Research*[2]:

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, of course).

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 your 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 lead to painful memories, or damage to their relationships, beliefs or social standing.[3] 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 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, 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 Economic and Social Research Council (ESRC) has identified the following research participants and activities as involving more than minimal risk and will therefore likely require submission to and approval by the RCA Research Ethics Committee or

[2] UK Research Integrity Office (2009), *Code of Practice for Research*, pp. 7-8, http://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf 3 University of Brighton (2016), *Guidance on issues in research ethics*, p. 2,

http://about.brighton.ac.uk/ask/files/2214/7739/1322/Guidance_on_issues_in_research_ethics.pdf

appropriate 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;[4] 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. (See section 7 for more information on participants and consent.)

4. Obligations and Responsibilities

4.1 Researchers should comply with the RCA Research Ethics Policy and recognise their

[4] ESRC, *Research that may require full ethics review,* http://www.esrc.ac.uk/funding/guidance-for-applicants/research-ethics/research-that-may-require-full-ethics-review/

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 Health & Safety policy, 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 fulfill their responsibilities with regards to the ethical consideration of postgraduate research. All new research supervisors should undergo the Epigeum Research Ethics training module and submit their certificate of completion to ethics@rca.ac.uk prior to the commencement of the research student's study.

4.4 Research students are required to review their ethics compliance at least annually as part of their Interim Exam process. Research students will need to complete the Epiegeum Research Ethics training as part of their course (e.g. as part of the Research Methods course) and submit their certificate of completion to ethics@rca.ac.uk.

4.5 The UK Research Integrity Office suggests that 'when designing research projects, researchers should ensure that:

4.5.1 the proposed research addresses pertinent question(s) and is designed either to add to existing knowledge about the subject in question or to develop methods for research into it;

4.5.2 the design of the study is appropriate for the question(s) being asked and addresses the most important potential sources of bias;

4.5.3 the design and conduct of the study, including how data will be gathered, analysed and managed, are set out in detail in a pre-specified research plan or protocol;

4.5.4 all necessary skills and experience will be available to carry out the proposed research, in the proposed research team or through collaboration with specialists in relevant fields;

4.5.5 sufficient resources will be available to carry out the proposed research and that these resources meet all relevant standards;

4.5.6 any issues relating to the above are resolved as far as possible prior to the start of the research.'[5]

4.6 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. Please see 7.7 for information on providing translations of information

[5] *UK Research Integrity Office (2009), Code of Practice for Research, p. 11, http://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf*

[6] *UK Research Integrity Office (2009), Code of Practice for Research, pp. 16-17, http://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf*

sheets and related materials.

4.7 When traveling overseas for research, you should carry out a risk assessment and take into account advice from the Foreign and Commonwealth Office (FCO) for both the country as well as the specific geographic area you will be visiting. (For example, some low risk countries may still have local areas which are high risk, and vice versa.) Where the FCO advises against travel to certain countries or regions, it is unlikely you will receive approval from the appropriate Ethics Committee unless you have already received approval from your Dean.

4.8 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.

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

4.10 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.[6]

4.11 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.

5. RCA Research Ethics Committee

5.1 The RCA Research Ethics Committee operates across the RCA with two sub committees for Research Staff and Students and for Taught MA Students.

5.2 Committee Membership:

5.2.1 RCA Research Ethics Committee: Academic members of staff from each of the RCA's Schools and Research Centres, the Chairs of the Ethics Committee, a senior representative from ILTS and HR, the Health, Safety & Environmental Manager, and two external members will form the Committee. The Director of Research & Innovation and the Director of Academic Development will Co-Chair the Committee, and the Research & Innovation Office will provide the secretariat.

5.2.2 Research Staff and Research Students: Academic members of staff from each of the RCA's Schools and Research Centres, the Head of Knowledge Exchange, representatives from ILTS and HR, and a student representative will form the sub-committee. The Head of Research Development and the

Head of Research Programmes will co-Chair the sub committee, and secretariat will be provided by the Research & Innovation Office.

5.2.3 Taught MA Students sub-committee: Academic members of staff from each of the RCA's Schools and those Research Centres involved in MA programmes, Head of Programme for MRes, the Health, Safety and Environmental Manager, representatives from Student Support and ILTS, and a student representative will form the sub-committee. The Head of Academic Development will Chair the sub-committee, and the secretariat will be provided by the Research & Innovation Office.

5.3 The Research Ethics Committee which will meet once per term. Membership and meeting dates of the Ethics Committee will be published on the RCA Intranet.

5.4 Members of the Committee are active researchers and will therefore be submitting applications to the Committee for consideration. Where a conflict of interest arises, the relevant parties will not form part of the decision-making process and the ultimate decision rests with the Chair.

5.5 The remit of the RCA Research Ethics Committee is to oversee questions of ethics pertaining to the development of research and knowledge exchange activities by RCA researchers and taught MA students.

5.6 The RCA Research Ethics Committee will meet once per term and is responsible for the following:

5.6.1 establishing and maintaining the RCA Research Ethics Policy;

5.6.2 establishing and maintaining the ethics procedures, processes, and the ethics checklist;

5.6.3 establishing and maintaining best practice on ethical issues and ethical guidance by funders and regulatory bodies;

5.6.4 reviewing all decisions taken by the Research Ethics Committee and report on these to the RKEI Strategy Committee for the Research Staff and Students and to ASC for the Taught MA sub-committee, as appropriate;

5.6.5 reviewing, recommending and issuing decisions on Tier 3 ethical issues related to research and knowledge exchange activities by RCA researchers or MA students; and

5.6.6 reporting on matters arising during committee meetings to the RKEI Strategy Committee and ASC as well as reporting on research ethics externally as required

5.7 The RCA Research Ethics Sub-committees will meet at least once per term and are responsible for the following:

5.7.1 making recommendations to the Research Ethics Committee regarding the RCA Research Ethics Policy;

5.7.2 making recommendations to the Research Ethics Committee regarding ethics procedures, processes, and the ethics checklist;

5.7.3 making recommendations to the Research Ethics Committee on best practice and updated guidance by funders and regulatory bodies;

5.7.4 reviewing, recommending and issuing decisions on Tier 2 ethical issues related to research and knowledge exchange activities by RCA researchers or MA students, including escalating applications to the Research Ethics committee for Tier 3 approval;

5.7.5 reporting on matters arising during sub-committee meetings to the Research Ethics Committee.

5.8 There will also be a 'rapid response route' where necessary (e.g. when there is a short time period between notification of a successful funding bid and the start date of the projects) for the Research Ethics Committee, where the appropriate Committee will consider the ethics application via email.

6. Ethics Approval Procedures

6.1 Please see Annex 2 for the ethics approval process for Staff and Research Students. See Annex 3 for the ethics approval process for taught MA students. Please note that training and approval processes for taught MA ethics is currently being agreed by the Academic Development Office and will be updated in this policy in due course.

6.2 Research students and academic staff should complete online ethics training through Epigeum prior to undertaking research. The Epigeum certificate should be sent to ethics@rca.ac.uk where it will be logged. (See Annex 4 for information on Epigeum Research Ethics training.)

6.3 The Research Ethics Checklist and Forms (Stages 1, 2 and 3) can be found on the Research and Knowledge Exchange pages on the RCA Intranet.

6.4 Researchers should complete the Research Ethics Checklist prior to commencing research at the earliest opportunity. The Checklist approval is broken into these risk categories:

6.4.1 Green (Tier 1): All questions have been answered 'no'. Your project does not require ethical approval from the RCA Research Ethics committees and can start immediately, once signed off by the researcher's line manager or supervisor. The completed checklist should be sent to ethics@rca.ac.uk.

6.4.2 Yellow (Tier 2): Questions in Section 1 have been answered 'yes'. The Research Ethics Form must be completed and submitted (with information and consent forms, as appropriate) to the appropriate RCA Research Ethics sub-committee. You cannot start your research until you have received approval from the appropriate Ethics Sub-Committee.

6.4.3 Red (Tier 3): Questions in Section 2 have been answered 'yes'. The Research Ethics Forms (both Stage 1 and Stage 2, and possibly Stage 3) must be completed and submitted (with information and consent forms, as appropriate) to the appropriate RCA Research Ethics Committee. External approval may also be required. You cannot start your research until you have received approval from the appropriate Ethics Committee.

6.4.4 Purple: (Tier 3): Questions in Section 2 have been answered 'yes'. The Research Ethics Forms (both Stage 1 and Stage 2, and possibly Stage 3) must be completed and submitted (with information and consent forms, as appropriate) to the appropriate RCA Research Ethics Committee. External approval may also be required.

6.5 If your research involves children or vulnerable adults, you will need to obtain a Disclosure and Barring Service (DBS) Check. If your research will be taking place overseas, you will need to obtain the equivalent clearance for that country as well as DBS clearance.

6.6 If you are conducting research overseas, you will need to indicate in your ethics application whether you are familiar with the culture and language of the country. You will also need to indicate if there are any military conflicts or political sensitivities. If you are working with another organisation, such as an aid agency, who has their own security procedures, you should state this in the ethics application.

6.7 For academic staff, the Research Ethics Checklist and Form must be approved and endorsed by the Head of Programme or Dean prior to submission to the Research Ethics Committee. For research students, the Research Ethics Checklist and Form must be approved and endorsed by the primary Research Supervisor prior to submission to the Research Ethics Committee.

6.8 Research Ethics Checklists and Forms should be sent to ethics@rca.ac.uk for consideration by the appropriate Committee.

6.9 Where the research is being undertaken in collaboration with other institutions or organisations, web links to the ethics policies of those institutions should be included on the Form prior to submission.

6.10 You must check whether permission or ethical approval is required from any other body prior to undertaking the research. You must also ensure your research complies with the appropriate legislation and professional codes of practice/conduct. Please see Section 3.4 for more information on external bodies which may need to provide ethical approval.

6.11 If your research requires external ethical review by the NHS or other government bodies, their approval may be accepted as equivalent to the RCA's approval. The researcher will still need to submit the Research Ethics Checklist and Form along with the external approval to the Research Ethics Committee.

6.12 If you are carrying out research outside of the UK, you must check if ethical approval or other permissions are required and obtain these prior to applying for ethical approval at the RCA.

6.13 If there are any conflicts between the ethical requirements of different organisations or countries and the RCA's requirements, you need to make this clear in your ethics application.

6.14 The Committee will consider submitted forms and will issue one of the following decisions:

6.14.1 Approve outright
6.14.2 Approve with conditions
6.14.3 Feedback provided and a response requested
6.14.4 Full resubmission
6.14.5 Reject outright

6.15 The Committee's decisions will be reported to applicants within two weeks of the Committee meeting. Appeals should be submitted via email to ethics@rca.ac.uk within 2 weeks of the decision. Applicants can appeal a decision where there are questions around the process and clarity of the Ethics Committee decision. The Committee's decision regarding an appeal is final.

6.16 If you are asked to Resubmit with Minor Revisions, a member of the Committee will work with you to make the corrections. If you are asked to Resubmit with Major Revisions, you will need to resubmit your Ethics form.

6.17 Once you have received ethical approval, your project and project staff will be covered by the RCA's insurance as long as the research is carried out as stated in your ethics application (otherwise you are at risk of the insurance being invalidated). If you need to make any changes to your research, you will need to apply for a substantial amendment to the appropriate Ethics Committee and receive updated approvals.

6.18 Examples of substantial amendments are:
6.18.1 Changes to the design or methodology of the research, or to the background information affecting its scientific value
6.18.2 Changes to the procedures participants need to undertake
6.18.3 Any changes relating to the safety or physical or mental integrity of participants
6.18.4Changes to study documentation, e.g. participant information sheet or consent form
6.18.5 Any previously unforeseen issues of disclosure arise
6.18.6 Additions or changes to the research team
6.18.7 Changes required in order to comply with new legislation[7]

6.19 You will also need to check whether your project requires additional insurance; this is particularly the case if your research involves human participants. If you are seeking external funding for the project, then this cost should be factored into the budget. If you are not receiving external funding for the project, then please speak to your Dean about insurance costs.

6.20 *Good Practice*

6.20.1 Give yourself plenty of time to prepare the application, and start on the application as early in the research design process as possible. Think about all aspects of your research

[7] *Anglia Ruskin University (2016), Code of Practice for Apply for Ethical Approval at Anglia Ruskin University, p. 27, http://web.anglia.ac.uk/anet/rido/ethics/index.phtml?utm_source=ethics&utm_medium=url&utm_campaign=redirect&utm_content=ethics.vc.aug09*

and consider potential risks and ethical issues.

6.20.2 Submit a complete application with all documentation.

6.20.3 Spell out acronyms in your application and avoid the use of jargon.

6.20.4 Don't use 'anonymous' and 'confidential' interchangeably. (See Section 7.15)

6.20.5 Provide telephone/email contact details in information sheets but do not provide personal contact details. Participants should be able to contact someone (ideally the Principle Investigator responsible for data management) to make requests about their personal data. The rule works for RCA research, but students should be aware if they continue to use their research data after completing their studies, participants will have to contact them directly as the RCA will have no involvement

6.20.6 Provide contact details for participants should they have concerns, e.g.provide your Supervisor contact details if you are a PhD student, etc.

6.20.7 Consider all risks, even for low risk research.

6.20.8 Be aware of any legislation that your research may fall under, such as the Human Tissue Act (2004). You will need to show you are familiar with the legislation in your ethics application.

7. Selection of Participants and Consent

7.1 You must give the Ethics Committee assurance that you have given careful consideration to the selection of participants in your project and that your selection complies with the Data Protection Act (2018).

7.2 Participants should be informed when invited to participate what personal or special category data will be required from them and how this data will be used. They will also need to be informed:

7.2.1 how the data will be stored and for how long
7.2.2 who it will be shared with
7.2.3 who they can make a complaint or request to about their data
7.2.4 if it will be transferred internationally
7.2.5 their rights in relation to their data and contact details for the data protection officer
7.2.6 the lawful basis for using personal data

There is simple guidance for this (see Annex 1)

7.3 When conducting research in another organisation, you will need to consider how you will select participants and how you will access their names. You must seek written permission from the individuals before you are able to utilise their details held by the organisation, unless their names are already in the public domain. It may be necessary for the initial approach to participant to come from someone working at that organisation. You should also ensure the participants are allowed to participate voluntarily and are not coerced by the organisation.

7.4 If you want to use participants (and their details) from the RCA, please email ethics@rca.ac.uk to seek advice. Your request will be passed on to the correct individual or department.

7.5 You should make potential participants aware of your inclusion and exclusion criteria so you do not collect any unnecessary data. You should avoid wasting potential participants' time; e.g. screen people out who do not meet the inclusion criteria early on and do not ask them to complete questionnaires before excluding them from the study.

7.6 Consent should be freely given and un-coerced, and participants must have the capacity to both consent and to withdraw without providing an explanation.

7.7 The Participant Information Sheet should be written clearly and concisely and should use the language of your participants. You may need to check the average reading level of the area in which you are carrying out the study, and you should also consider participants who may have special needs (e.g. dyslexia). In these circumstances, you will also need to consider and explain how you will secure and document consent as written consent may not be practical or possible. Where information sheets and other materials must be translated into other languages, the researcher should provide assurances to participants and to the appropriate Ethics Committee that the translation is fair and accurate.

7.8 The information sheet should include all relevant information about the project and the participant's involvement (including whether they will need to travel and how frequently), including the data to be collected, how it will be used and stored, how long it will be stored, and how and when participants can withdraw their participation and/or their data from the study. You should inform participants if you will be using direct quotes in your dissemination or recording video or audio. You should not make promises to the participants that you are unable to keep, e.g. telling participants that they can withdraw at any time when it will not be possible to exclude their data once the study has been completed and the data has been published. Another example is focus groups, where it will not be possible for a participant to withdraw without removing the data for all participants.

7.9 If your research is in an area where disclosure of sensitive information may occur (e.g. illegal activities, unethical or bad practice in the workplace, etc.), the information sheet should include a clause stating that if certain information or details are revealed, they will need to be passed on to a third party.

7.10 The Participant Information Sheet should confirm that your project has received ethical approval from the RCA and from any other external bodies, as applicable. You should provide your RCA email address and contact details, and you should provide an email address for participants to contact with any complaints about the research processes and activities (ethics@rca.ac.uk).

7.11 You should check that your participants have understood the information sheet and should provide adequate time to the potential participants to decide whether they want to take part and complete the consent form.

7.12 If a participant wishes to withdraw but you would still like to use their data in your research, you will need their consent.

7.13 You must make it easy for participants to withdraw and provide several options, such as emailing or posting you a note to indicate they wish to withdraw at the start of the study.

7.14 Data should be anonymised where possible, but you should also be careful about making unrealistic assurances about anonymity of data. It is important to remember that it is not just names which can make data identifiable. You should make it clear on the information sheet who will have access to personal or sensitive data.

7.15 'Anonymous' and 'confidential' should not be used interchangeably. 'Anonymous' should be used to describe an activity where the participant and their responses or data cannot be linked together and it is impossible to know whether an individual participated, meaning they are not asked for any identifying information. 'Confidential' should be used to describe activities where the participants are asked to provide personal information which can then link the results or responses to the participant, but the connection between the participant and the data is not revealed.

7.16 If you are asking participants for information about other people, you will need to obtain consent or permission from those people as well.

7.17 You would normally expect to gain written consent from participants, but sometimes this is not possible or appropriate. If verbal consent is obtained, this should be audio recorded. You will need to justify in your ethics application why you are not obtaining written consent.

7.18 There are some types of research where it is not possible to obtain consent, e.g. covert observation. You must justify your approach and any potential harm to participants that may result from the research.

7.19 You may have access to personal or sensitive data in your research for which you did not obtain consent. If the data set is large and anonymous, this will pose low ethical risks and concerns. However, it is of more concern in one of these circumstances:

7.19.1 If you have access to the data through a non-research role, e.g. employment

7.19.2 If you collected the data via the internet, e.g. social networking sites

7.19.3 If you do extensive data gathering and linking which could allow individuals to be identified, even for publicly available data

7.19.4 If you use the data in a different way than you have gained consent for from the participants that they may object to

Ensure you have completed the Stage 1 Research Ethics Risk Category Assessment form and follow the ethics processes. If this data arises during the course of your research after you have gained ethical approval, you should complete the Stage 1

Research Ethics Risk Category Assessment form again and resubmit to the appropriate Ethics if necessary. (See Section 6.16)

7.20 When carrying out your research in other organisations, you must obtain written permission from a person in authority within the organisation. The signed letter must include permission for your use and ownership of the data and your right to publish findings. You will also need permission if you plan to use the name of the organisation in the dissemination of your findings or if the organisation may be identified in some other way.

7.21 If you are asking people to complete a questionnaire, you do not need to gain consent separately. You should include the same statements and information you would include on consent forms and information sheets on the questionnaire. You can ask the participant to check a box indicating they consent to participate.

7.22 Be mindful of issues around copyright if you are using a standard questionnaire. If you create your own questionnaire, it is good practice to pilot it first.

7.23 Once you have received the signed consent forms for your project, you should store these securely for the remainder of the project. (Please refer to the RCA Information and Data Management Policy for more information on data storage and management; see Annex 1.)

8. Definitions

8.1 From the REF2014 *Assessment Framework and Guidance on Submissions:* '***Research*** is defined as a process of investigation leading to new insights, effectively shared.' It includes work of direct relevance to the needs of commerce, industry, and to the public and voluntary sectors; scholarship; the invention and generation of ideas, images, performances, artefacts including design, where these lead to new or substantially improved insights; and the use of existing knowledge in experimental development to produce new or substantially improved materials, devices, products and processes, including design and construction. It includes research that is published, disseminated or made publicly available in the form of assessable research outputs, and confidential reports.[8]

8.2 In the context of this policy, ***researcher*** refers to RCA academic staff and research students (MRes, MPhil, PhD). Taught MA students who are collecting data or carrying out other research activities as part of a course project are considered researchers.

8.3 ***Research ethics*** refers to the moral principles guiding research from its inception and design, through the execution of the research, to the dissemination of the results of the research.[9]

8.4 ***Research integrity*** means conducting research to the highest standards of rigour and integrity. This includes honesty and rigour in all aspects of research, transparency and open communication, and care and respect for participants in and subjects of research.

[8] *ibid*

[9] *The British Psychological Association (2014), Code of Human Research Ethics, p. 5,*

http://www.bps.org.uk/system/files/Public%20files/code_of_human_research_ethics_dec_2014_inf180_web.pdf

[10] *Universities UK (2012), The Concordat to Support Research Integrity, p. 11, http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2012/the-concordat-to-support-research-integrity.pdf*

Maintaining research integrity leads to trust and confidence in research and develops research value and benefits.[10]

8.5 ***Research misconduct*** includes, but is not limited to:

8.5.1 Fabrication: The creation of false data or other aspects of research, including documentation and participant consent

8.5.2 Falsification: Inappropriate manipulation and/or selection of data, imagery and/or consents

8.5.3 Plagiarism: Misappropriation or use of others' ideas, intellectual property or work (written or otherwise), without acknowledgement or permission

8.5.4 Misrepresentation, includes:

8.5.4.1 Misrepresentation of data, e.g. suppression of relevant findings and/or data, or knowingly, recklessly or by gross negligence, presenting a flawed interpretation of data

8.5.4.2Undisclosed duplication of publication, including undisclosed duplicate submission of manuscripts for publication

8.5.4.3Misrepresentation of interests, including failure to declare material interests either of the researcher or of the funders of the research

8.5.4.4Misrepresentation of qualifications and/or experience, including claiming or implying qualifications or experience which are not held

8.5.4.5Misrepresentation of involvement, such as inappropriate claims to authorship and/or attribution of work where there has been no significant contribution, or the denial of authorship where an author has made a significant contribution

8.5.5 Breach of duty of care, whether deliberately, recklessly or by gross negligence:

8.5.5.1 Disclosing improperly the identity of individuals or groups involved in research without their consent, or other breach of confidentiality

8.5.5.2 Placing any of those involved in research in danger, whether as subjects,participants or associated individuals, without their prior consent, and without appropriate safeguards even with consent; this includes reputational danger where that can be anticipated

8.5.5.3 Not taking all reasonable care to ensure that the risks and dangers, the broad objectives and the sponsors of the research are known to participants or their legal representatives, to ensure appropriate informed consent is obtained properly, explicitly and transparently

8.5.5.4 Not observing legal and reasonable ethical requirements or obligations of care for animal subjects, human organs or tissue used in research, or for the protection of the environment

8.5.5.5Improper conduct in peer review of research proposals or results (including manuscripts submitted for publication); this includes failure to disclose conflicts of interest; inadequate disclosure of clearly limited competence; misappropriation of the content of material; and breach of confidentiality or abuse of material provided in confidence for peer review purposes

[11] Research Councils UK (2017), RCUK Policy and Guidelines on Governance of Good Research Conduct, pp. 6-7, http://www.rcuk.ac.uk/documents/reviews/grc/rcukpolicyguidelinesgovernancegoodresearchconduct-pdf/

[12] University of Brighton (2016), Guidance on issues in research ethics, p. 2, http://about.brighton.ac.uk/ask/files/2214/7739/1322/Guidance_on_issues_in_research_ethics.pdf

8.5.6 Improper dealing with allegations of misconduct: Failing to address possible infringements including attempts to cover up misconduct or reprisals against whistle-blowers; or failing to deal appropriately with malicious allegations, which should be handled formally as breaches of good conduct.[11]

8.6 ***Risk*** refers to the level of potential physical or psychological harm, pain, discomfort or stress to participants and to researchers.[12]

8.7 ***Desk-based research***, or ***secondary research***, involves the summarising, collating or synthesising existing research or existing research data. ***Primary research*** involves the collection of new data and conducting original research.

Annex 1: Information, Resources and Links

Anglia Ruskin University *Code of Practice for Applying for Ethical Approval at Anglia Ruskin University* (2016): http://web.anglia.ac.uk/anet/rido/ethics/index.phtml

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: http://www.esrc.ac.uk/funding/guidance-for-applicants/research-ethics/

Ethical Research Involving Children project: 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/

Research Councils UK (RCUK) Research Good Practice: http://www.rcuk.ac.uk/publications/researchers/grc/

Social Research Association Ethics: http://the-sra.org.uk/research-ethics/ethics guidelines/

UK Research Integrity Office (UKRIO) Code of Practice for Research: http://ukrio.org/publications/code-of-practice-for-research/

UKRIO Checklist for Researchers: http://ukrio.org/publications/checklist-for researchers/

Universities UK – Oversight of security-sensitive research material in UK universities: http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/oversight-of security-sensitive-research-material-in-uk-universities.aspx

Other University Research Ethics Policies and Guidance

University of the Arts London Code of Practice on Research Ethics: http://www.arts.ac.uk/media/arts/research/research-degrees/Code-of-Practice-on Research-Ethics.pdf

University of Brighton Guidance on Issues in Research Ethics July 2016: http://about.brighton.ac.uk/ask/files/2214/7739/1322/Guidance_on_issues_in_resea rch_ethics.pdf

Glasgow School of Art Research & Knowledge Exchange Ethics Policy 2016: http://www.gsa.ac.uk/media/861048/gsa-research-ke-ethics-policy-2016.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

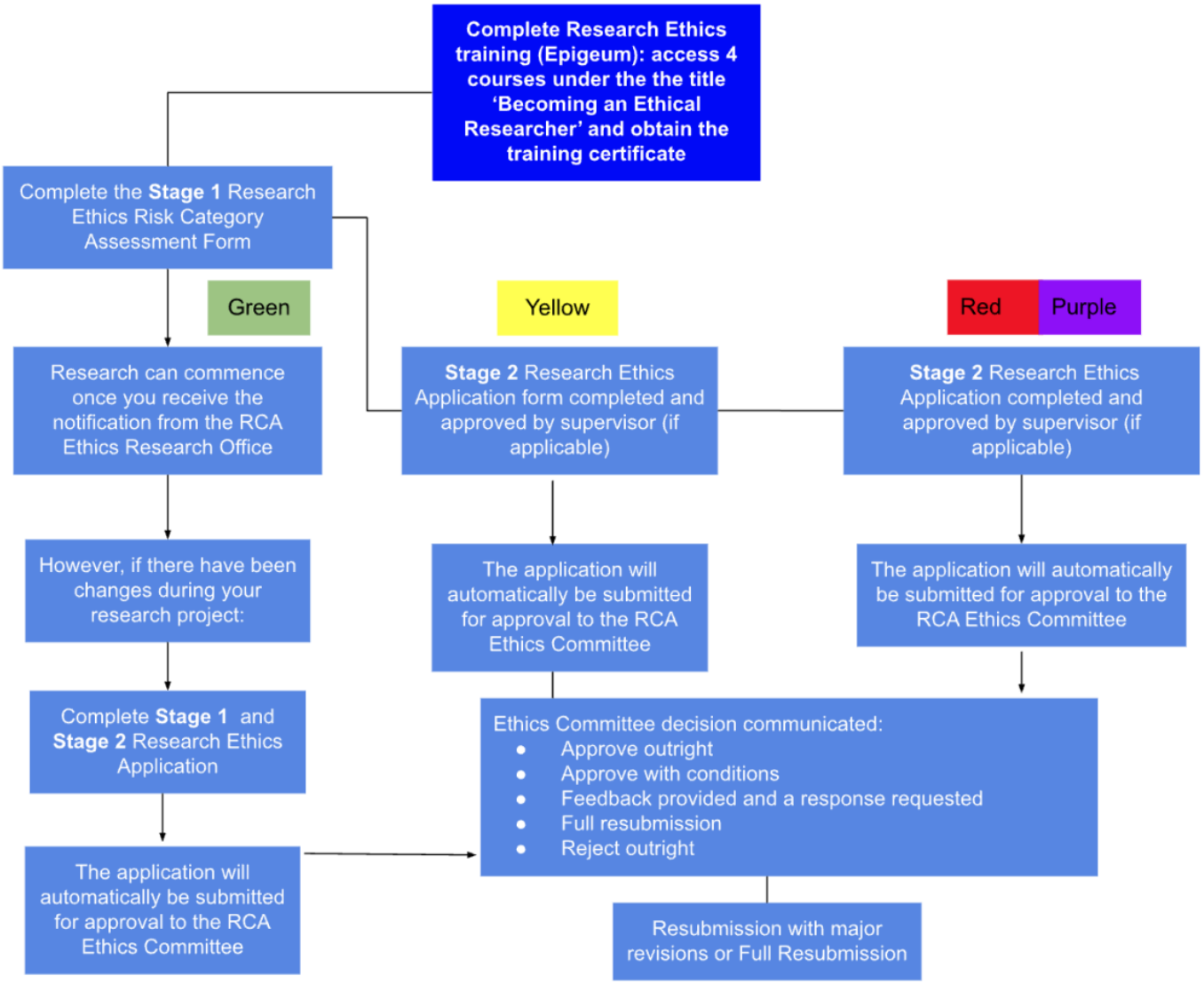
RCA Information and Data Management Policy

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

RCA Intellectual Property Rights Policy

RCA Travel Insurance Policy

Annex 2. Ethics Procedure Flowchart of Staff and Research Students:



Annex 3: MA Ethics Procedures

Please note that training and approval processes for taught MA ethics is currently being agreed by the Academic Development Office and will be updated in this policy in due course.

Annex 4: Online Research Ethics Training for Staff and Research Students

Staff and research students will need to complete online ethics training and submit their pass certificate in order to be eligible to submit ethics applications to the Research Ethics Committee. You must achieve a score of 80% in order to pass the course. Please note you will need a token in order to access this training. (See guidance below.)

Research staff will need to complete online ethics training:

- when you first begin to supervise Research students, and then every 2 years thereafter; or
- when you begin to design a research project (in preparation for completing and submitting the Ethics Stage 1 and 2 forms to the RCA Research Ethics Committee).
- If you have already successfully completed Epigeum training within the last 2 years and have submitted your certificate to ethics@rca.ac.uk, you do not need to undertake the training again when you start a new research project or begin supervising research students.
- You will not be eligible to supervise research students or begin a new research project if your last Epigeum research ethics training took place more than 2 years prior.

Research students will need to complete Epigeum training:

- generally within the first year of their course, most commonly through the Research Methods Course or equivalent.

In order to access the online ethics training:

- To register for Epigeum, visit this link: https://researchskills.epigeum.com/ • Complete the fields and click the 'Register Now' button at the bottom. • If you have not been provided with an online training token, you should request this via ethics@rca.ac.uk.
- You can then choose the Research Ethics training course *Ethics 1: Good research practice*, clicking on it to open it.
- You will then see a box to enter the token into; once you have supplied the token, you can access the course.
- The direct link for Research ethics: Ethics 1: Good research practice is https://researchskills.epigeum.com/online-courses?section=4