

## RCA policy on ethics in research funding

### Research ethics and integrity at the RCA

Secure funding in order to be able to carry out research is an important part of being an academic in a UK university. At the RCA, staff in our Schools and Research Centres routinely submit applications and are awarded funding by organisations from across the public, private and third sectors, to support them to undertake research, knowledge exchange and innovation activities. These funders include:

- the Office for Students and the UK Research & Innovation (UKRI) funding bodies, including the UK Research Councils, Research England, and InnovateUK
- various EU research funding programmes administered by the European Commission
- UK trusts and foundations that fund research (the Wellcome Trust, the Leverhulme Trust)
- other government and public research funding bodies in the UK and in other countries
- individual businesses across many industry sectors, from SMEs to large multi-national corporates based in the UK and in other countries
- charities and NGOs in the UK and in other countries

Research activity at the RCA is governed by the College's [Research Ethics policy](#), which is based on sector-wide good practice and professional standards in research ethics. It is founded on the principles of integrity and transparency in research. It includes the requirement for those undertaking and managing research in the College to demonstrate robust risk management and good practice in research ethics and integrity in areas including:

- Health and safety
- Using human participants and animals in research
- Intellectual property rights
- Conflicts of interest
- Data management
- Publication and authorship
- Misconduct in research

The UK research and higher education funding bodies (UKRI and OfS) require HEIs to commit to the principles set out in the [UUK Concordat to support research integrity](#) (2012, revised 2019). The RCA is a supporter of this Concordat, whose principles set out a commitment to:

- upholding the highest standards of **rigour and integrity** in all aspects of research
- ensuring that research is conducted according to appropriate **ethical, legal and professional frameworks**, obligations and standards
- supporting a research environment that is underpinned by **a culture of integrity** and based on **good governance, best practice and support** for the development of researchers
- using **transparent, robust and fair processes** to deal with allegations of research misconduct should they arise
- **working together** to strengthen the integrity of research and to reviewing progress regularly and openly.

### Ethics of research funding sources

As part of broader good practice in research ethics and research integrity, it is appropriate to monitor not only how we conduct our research, but also how we fund our research. When considering whether it is appropriate to accept funds from a particular source to carry out research or knowledge exchange, the

principles of ethics, integrity and transparency set out above apply. Four additional key principles also come into play:

1. The principle of **academic freedom** (see below)
2. The need to **avoid conflicts of interest** whether perceived or actual, between the funding source and the research to be carried out, e.g. in the form of **avoiding undue** influence over academic matters such as the research questions, methods, outcomes and outputs for a particular research or knowledge exchange project
3. The need to be **open and transparent** about all sources of funding for a research or knowledge exchange project or activity
4. The need to **permit research activity to be undertaken** and funded, where it is lawful and has received appropriate ethical approval.

## Academic freedom

The principle of academic freedom, to which all UK universities adhere, was established by the 1988 Education Reform Act, and is key here. The RCA's Statutes (§23) set out the College's responsibility to adhere to this principle, stating it will 'ensure that Academic Staff have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges'.

Research undertaken outside the UK is likely to be subject to local law, which may differ from UK law, and the College's research ethics processes require staff working in these circumstances to see approval from the Research Ethics Committee before undertaking their research.

In the context of considering the ethics of research funding sources, the [Nolan principles in public life](#) – selflessness, integrity, objectivity, accountability, openness, honesty, and leadership – provide a helpful framework for making decisions about whether a funding source is acceptable for a particular programme of research, knowledge exchange, executive education and innovation activity.

## Making decisions on the ethics of accepting research funding from a particular source

The key consideration in any decision about whether it is ethical to accept funding for research from a particular source is not just what the funding source is, but also:

- how that relates to the specific programme of research it will support
- whether there is a risk of perceived conflict of interest in the funding source's interest in the research project and/or the research findings
- whether the funder might use the results or outputs of the research for unethical purposes
- whether accepting the funding might bring the member of staff, their School or Centre, or the College into disrepute, or undermine the integrity of their research findings

All decisions about whether or not a source of research funding is ethical must therefore be considered on an individual basis, taking account not just of the **source of funding**, but of the **purpose of the research** to be carried out with the funding, and any resulting **risk of perceived or actual conflicts of interest** or **risk of undermining the integrity and independence** of the programme of research carried out. What is deemed acceptable in one set of circumstances might not be acceptable in another.

## Examples of funding sources considered unethical

Universities UK and Cancer Research UK have a long-standing joint [Protocol on Tobacco Industry Funding to Universities](#) which sets out key principles for universities to follow in scrutinising and accepting sources of research funding, and strongly encourages all UK universities not to accept tobacco industry funding for research or any other activities.

There may be cases where it might be judged acceptable to proceed with a particular source of funding or industry that is considered ethically unacceptable by some, if the funding is used to ask challenging questions and address uncomfortable material or issues, and there is no risk of interference by the funding source in the programme of research and the research findings and outputs. In other cases, there may be a risk that accepting funding from such a source would undermine perceptions of academic independence or even place researchers at risk of reprisals or attack (verbal or physical), and in such circumstances, the decision may be that it is not appropriate to accept such funding. Equally, a funding source may appear ethically sound but the funder may wish to influence the programme of research or the research findings and outputs, and in such circumstances the decision may be that it is not appropriate to accept such funding for that particular purpose. Where research activity and funding is lawful and has received ethical approval, the principle should be that it should proceed, and not be blocked unreasonably by parties with conflicting interests.

The process for ethical evaluation of sources of research funding are separate from the due diligence assessments that form part of the [College's Gift Acceptance policy](#), which applies to philanthropic donations. The principles, however, are similar, with the Gift Acceptance policy requiring donations to be accepted only if they support the RCA's mission, values and ethics, do not pose an unacceptable reputational risk to the College, do not create an unacceptable conflict of interest, do not restrict academic freedom and independence, and do not conflict with the College's charitable aims and socially responsible approach.

### **Process for seeking ethical approval of a funding source**

All research and research funding has an ethical dimension, ranging from minor to substantial considerations. The principles set out in the College's proposed statement of ethics and integrity in research funding provide a benchmark and checklist against which staff undertaking research at the College should evaluate any research, knowledge exchange or innovation activity, and provide a statement on how the Principle Investigator will mitigate any research ethics and research integrity issues that arise, seeking approval from the College's research ethics committee where appropriate.

The RCA's RKEI Strategy Committee is the body responsible for making decisions about any ethical questions that arise about the suitability of a particular source of research funding. The Director of Research & Innovation, as chair of that committee, has the final say if agreement cannot be reached, and the Director may request advice from the College's Research Ethics Committee where appropriate.

### **RCA Policy statement on ethics and sources of research funding**

The Royal College of Art is committed to the principles of research integrity, research ethics and good governance in its research, knowledge exchange and innovation activities. In accepting any funding to support those activities, it will seek assurance that the following principles are respected:

- a) maintaining the highest standards of rigour, integrity and impartiality in all aspects of research, knowledge exchange and innovation

- b) ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards, and that the RCA's expertise, facilities and resources are not knowingly made available for purposes that would damage the public interest or common good
- c) ensuring that research is carried out with demonstrable value for money
- d) ensuring that research is designed and executed in such a way as to provide maximum benefit and minimum harm to participants and users
- e) maintaining and respecting the principle of academic freedom, and ensuring researchers in receipt of research funding have the freedom to conduct their work in accordance with normal UK academic research conventions
- f) maintaining and respecting the freedom to pursue research without being subject to undue or inappropriate influence over the research outcomes
- g) ensuring a research culture that is open, transparent, fair and objective
- h) ensuring that there is no risk of perceived conflict of interest or undue influence between the source of any funding for research, knowledge exchange and innovation activities and the programme of research and the research findings supported by the funding source
- i) ensuring that there is no risk that the funder could use the results or outputs of the research for unethical purposes
- j) ensuring that there is no risk that accepting the funding could bring the member of staff, their School or Centre, or the RCA into disrepute, or undermine the integrity of their research and their research findings

Director of Research & Innovation  
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