



# Policy ID # | Research Ethics Policy

Signed off by Research Committee | Date of sign off | Version no. #

Next Review Date	Q1 26	Review Frequency	Annually
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Lead Contact	Dr Shoshanna Isaacson, Research Grants Manager
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Who/what this policy applies to	<p>This policy applies to all members of the V&amp;A engaged in research<sup>1</sup>, including staff, Museum-affiliated researchers, and students as well as anyone conducting research under the auspices of the V&amp;A not included in one of these three groups.</p> <p>This includes research undertaken outside any of the Museum sites and/or overseas by anyone affiliated with the Museum when conducted within the course of their affiliation.</p>
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Agreed exemptions	The policy does not cover the activities of members of the public who use the Museum collections and facilities, if not affiliated with the V&A.
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Regulatory framework/legislation	All research projects carried out under the auspices of the V&A must seek ethical approval <u>before</u> research commences. To seek ethical approval for a new research project (or a component of a project not covered by a previous research ethics application) please complete the application form which must be requested from the Research Grants Manager. Please note, that this a two-stage application process (see details under 2.VII).
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Related policies/procedures	<p>This policy should be read in conjunction with the following policies and procedures found on the <a href="#">People Hub</a> on the V&amp;A Staff Intranet:</p> <ul style="list-style-type: none"><li>• V&amp;A Ethical Approval Process for Research Projects (see Appendix 1)</li><li>• V&amp;A Open Access Policy (in preparation, due to be published in Summer 2025)</li><li>• <a href="#">V&amp;A Records Management and Archives Policy</a></li><li>• <a href="#">V&amp;A Safety Policy</a> (under review by V&amp;A Safety &amp; Security Committee)</li><li>• V&amp;A Data Preservation Policy (in preparation, due to be published in Spring 2025)</li><li>• V&amp;A Security Policy</li><li>• <a href="#">V&amp;A Safeguarding Policy</a> (public facing)</li><li>• <a href="#">Code of Conduct Policy</a> &amp; <a href="#">Counter Fraud and Anti-Bribery Policy</a></li><li>• V&amp;A AI principles</li><li>• <a href="#">V&amp;A Acceptable Use Policy for AI Systems</a></li></ul>
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<sup>1</sup> See Terms and Definitions

# Policy Overview

## 1. Policy Statement

*1.1 This document sets out the Victoria and Albert Museum's (V&A) Research Ethics Policy. The V&A is committed to the advancement of high-quality research and values the ability of its staff to engage in research activity. This policy sets out the standards of performance and conduct expected of all staff, students and affiliated personnel engaged in research at V&A South Kensington, V&A East Storehouse and Museum, Young V&A and V&A Wedgwood Collection. It is designed to ensure that research carried out at the V&A is conducted in an ethical and accountable manner. It aims to safeguard all stakeholders to meet the requirements of relevant funding and professional bodies, and to manage risk in relation to research.*

### Policy Principles

This policy is based on standard expectations of good practice as outlined by the [UKRI Policy and Guidelines on Governance of Good Research Conduct \(2022\)](#), [Universities UK's revised Concordat to Support Research Integrity \(2019\)](#), our legal requirements, and professional guidance issued periodically from funders and other relevant bodies. It is also based on policies already published by UK Universities and Independent Research Organisations.

The Museum expects and encourages all staff, students and those affiliated with the Museum who undertake research for the Museum to comply with this Policy. To facilitate this, the Museum will:

- a. foster a research culture informed by principles set out in this Policy and in line with legislation governing the protection of the dignity, rights, safety, freedom of expression and privacy of those involved in research in any capacity;
- b. provide clear, straightforward, accessible guidance on ethical best practice in research;
- c. maintain a transparent and fair ethical clearance review process that ensures scrutiny of all research projects at a level proportionate to the ethical risk.

The Museum will draw attention to the policy in its induction process for newly appointed researchers. Line Managers have a responsibility to ensure compliance by their staff. V&A co-supervisors of students engaged in research will aim to ensure compliance with the policy by their students; students should refer to this document alongside the Research Ethics policy of their own university. Failure to comply with this policy may give rise to an allegation of Research Misconduct (as further defined in Section 2.1). Research Misconduct is a very serious matter and may prompt disciplinary action in response.

### **1.2 Guiding Principles of Good Research Practice**

The Museum recognises that ethical issues raised by research vary across disciplines and practices. Set out below are the core guiding principles the Museum expects its researchers to follow (in conjunction with subject-specific guidance, where relevant). The 'Nolan Principles' form the basis of the ethical standards expected of anyone who works as a public

office holder, including everyone who works at a non-departmental public body such as the V&A.<sup>2</sup> They are:

1. Selflessness
2. Integrity
3. Objectivity
4. Accountability
5. Openness
6. Honesty
7. Leadership

V&A staff and students should adhere to these principles in all aspects of their research. In particular they should:

- Demonstrate integrity and professionalism;
- Observe fairness and equity;
- Avoid, and/or declare, conflicts of interest;
- Ensure the safety and well-being of those associated with the research;
- Observe all relevant legal and ethical requirements; and
- Be open to scrutiny and debate.

Good research practice should also include:

- Securing and storing primary data appropriately;
- Documenting results clearly and accurately;
- Attributing and acknowledging the contributions of others;
- Co-operating with other researchers; and
- Taking special account of the needs of less experienced researchers.

V&A staff and students are also expected to be familiar with the established values and principles shared by the international museum community, including the Museums Association, ICOM and ICON.<sup>3</sup>

<sup>2</sup> [Committee of Standards in Public Life, \*The 7 principles of public life\*](#) (published 31 May 1995)

<sup>3</sup> [Museums Association, \*Code of Ethics for Museums\*](#); International Council of Museums, [Code of Ethics for Museums](#); and [Institute of Conservation, \*Professional Guidelines\*](#)

# Policy Details

## 2. Ethical Standards and Requirements

All staff at the V&A must conduct their research<sup>4</sup> according to the following standards of good research practice: **Openness and Attribution**

Researchers will be honest in respect of their own actions in research and in their responses to the actions of other researchers. This applies to the whole range of research work, including designing experiments, generating and analysing data, applying for funding, publishing results, and when peer reviewing the work of other researchers. Researchers will strive to ensure the accuracy of research data and results, and acknowledge the direct and indirect contributions of colleagues, collaborators or other individuals where appropriate.

### ii. Managing Conflicts of Interest

Researchers will disclose any potential or actual conflict of interest in research. Such conflicts include (but are not confined to) legal, ethical, moral, financial, personal or academic interests. Potential conflicts of interest include a researcher's personal or familial affiliation to, or financial involvement with, any organisation sponsoring or providing financial support for a project they are undertaking. Financial involvement includes direct personal financial interest, receipt of personal benefits (including travel and accommodation) and receipt of material or facilities for personal use.

Any perceived conflict of interest must be disclosed to your Keeper, Head of Department or line manager and, if it relates to research, the Research Grants Manager, who will determine what further action should be taken. Further disclosure may need to be made to other key Museum staff and/or completion of a register of interests.

Where it is unavoidable that a purchase is made from a company in which a researcher has a direct or familial financial interest, the researcher is required to disclose that interest to their line manager, with reference to the Director of the V&A Research Institute, National Art Library and Archives (VARINALA) and will be barred from authorising the purchase him or herself.

### iii. Confidentiality and Freedom of Information

In general, research requires openness, but restrictions relating to publication and dissemination may apply in circumstances where the Museum or its partners have made or given confidentiality undertakings to third parties or confidentiality is required to protect intellectual property rights. It is the duty of the researcher to enquire of the Research Grants Manager, with reference to the Director of the V&A Research Institute, National Art Library and Archives, as to whether confidentiality provisions apply and of the Research Grants Manager and/or Director of the V&A

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<sup>4</sup> See Terms and Definitions

Research Institute, National Art Library and Archives to inform researchers of their obligations with respect to these provisions.

The V&A is subject to a statutory disclosure regime governed by the [Freedom of Information Act 2000](#) which requires all information in its possession to be disclosed upon request subject to some exceptions. In most cases, research papers will be deemed to be information for the purposes of this Act that will need to be disclosed upon receipt of a request so researchers should anticipate that all research undertaken at the V&A could be disclosed to the public.

#### **iv. Professional Standards**

Researchers will take all reasonable measures to comply with ethical and legal obligations as required by statutory and regulatory authorities, including seeking ethical review and approval for research when appropriate. This applies to the whole range of research work including methodological planning, generating and analysing data, publishing results and acknowledging the contribution of others. They will ensure that any research undertaken complies with any funder terms and conditions relating to the project. Researchers must ensure they are aware of legal requirements and organisational policies that regulate their work e.g. the [Ivory Act](#). Researchers will follow the requirements and guidance of any professional bodies in their field of research. Researchers who are members of a regulated profession<sup>5</sup> will also follow the specific requirements and guidance of the body regulating their profession.

#### **v. Purchasing and expenditure for research**

Purchasing and other expenditure of funds should take place in accordance with the terms and conditions of the Museum's financial regulations and staff Code of Conduct and of any grant or contract held for research.

#### **vi. Research Involving Human Participants, culturally sensitive material, Personal Data or Human Remains**

All research projects involving human subjects or participants, personal data, or human remains must be approved under the V&A's Ethical Approval Process for Research Projects before data gathering commences. This will involve a two-stage process: Stage 1 will determine whether a project is low or high risk. Any projects deemed 'high risk' will need to undergo Stage 2, a comprehensive research ethics review. Further details in **section vii**. Approval will also be sought from other regulatory bodies as necessary.

##### Human Participants

Researchers will ensure that all participants in a research project understand the process in which they are to be engaged, including who is undertaking and financing it, why it is being

<sup>5</sup> A regulated profession is one where access to or practice of a profession is restricted by national law to those holding specific qualifications.

undertaken, and how it is to be disseminated and used. Participation should be based on the freely given, informed consent of those studied and participants should be made aware of their right to refuse participation for any reason. Researchers will always strive to protect the rights of those they study, their interests, sensitivities and privacy.

### Participants under 18

Any research project involving participants under the age of 18 or vulnerable adults must undergo the full two-stage ethical approval process. The V&A's Safeguarding Policy must also be followed.

### Culturally sensitive material

Culturally sensitive material demands special respect. It can include but is not limited to items that hold religious or spiritual significance as well as those that are subject to cultural protocols restricting who is permitted to view and handle them. Research with culturally sensitive materials should be done respectfully and ethically and where appropriate by working collaboratively with relevant source communities.

### Human Remains

Researchers will ensure that human remains are treated in accordance with the [Human Tissue Act \(2004\)](#) as well as other regulatory and professional guidelines including Convention for the Protection of Human Rights and Fundamental Freedoms and Human Rights Act 1998. This legislation applies to museums holding or intending to hold human remains under 100 years old. The Act regulates the acquisition, storage, use and disposal of human bodies, organs and tissue. It requires a licence for organisations holding and displaying human remains. This policy follows the definition of human remains as used in the [DCMS Guidance for the Care of Human Remains in Museums](#).<sup>6</sup> Within the V&A collections, this includes but is not limited to osteological material (for example bones or fragments of bone and teeth). Frequently, these remains have been modified by human skill and/or bound-up with other non-human materials. Some items in the V&A collections incorporate human hair and nails. In line with The Human Tissue Act (2004), hair and nails are not considered to meet the formal definition of human remains, however V&A researchers will recognise that these may be of sacred importance to particular communities and therefore require sensitivity of approach.

### Personal Data

Researchers will at all times ensure that personal data is processed lawfully and in accordance with the provisions of the [Data Protection Act 2018](#), UK General Data Protection Regulation (UK GDPR), EU GDPR and Human Rights Act 1998. All researchers will be

<sup>6</sup> Department of Culture, Media and Sport, [Guidance for the Care of Human Remains in Museums](#) (published 2005)

required to follow V&A data protection policy and guidance and complete V&A data protection training .

### **vii. Research Ethics Review**

All research projects carried out under the auspices of the V&A must seek ethical approval before research commences. To seek research approval for a new research project (or a component of a project not covered by a previous research ethics application) researchers are required to complete this application form. Please note, that this a two-stage application process:

**Stage 1:** needs to be completed for all research projects carried out by any member of the Museum engaged in research, including staff and students and anyone conducting research under the auspices of the V&A. This includes research undertaken outside the Museum and/or overseas by the V&A staff when conducted within the course of their employment at the Museum.

Applications will be reviewed, in the first instance, by the relevant Head of Department and the Director of V&A Research Institute, National Art Library and Archives to determine if the project is 'low risk' or 'high risk'. Projects considered 'high risk', i.e. projects which might pose more than minimal risk, require a comprehensive ethical review and approval from the V&A Research Ethics Committee (convened on an ad hoc basis as required) before they can begin.

Projects considered 'low risk' will be approved based on a Stage 1 application.

**Stage 2:** projects considered 'high risk' require a more comprehensive ethical review and completion of an additional form.

Any project involving human participants under the age of 18 or data relating to directly identifiable human subjects is automatically considered to be 'high risk' and will require full ethical review,

In addition, the following types of research must always go the V&A Research Ethics Committee for approval:

- Research which involves or may lead to the publication of confidential information
- Deceptive research where the investigator actively sets out to misrepresent themselves
- Research involving vulnerable groups
- Research involving sensitive topics
- Research involving groups where permission of a gatekeeper is normally required for initial access to members
- Research which might induce unacceptable psychological stress, anxiety or humiliation

Researchers must adhere to data protection requirements, including ensuring that informed consent of participants is sought and obtained.

### **viii. Training and leadership**

Senior researchers and managers should create an environment of mutual cooperation in which all researchers are encouraged to develop their skills and in which the open exchange of ideas is fostered. They must also ensure that appropriate direction of research and its supervision are provided through normal project management procedures, mentoring and the Museum's Performance Management scheme. All researchers should ensure that they have the necessary skills and training for their field of research.

### **iv. Data**

Research data are primary sources of information produced, collected or observed during the research process. Research data must be recorded in a durable and auditable form, in accordance with the Museum's Records Management and Archives Policy, so that it can readily be discovered. It must be retained intact for a period of at least six years from the date of any publication, gallery scheme or exhibition which is based upon it. It is the duty of the principal investigator to ensure compliance with the data protection legislation with the support of the Data Protection Manager, and to ensure that copyright is not breached in line with guidelines laid down by the V&A.

### **ix. Research Outputs & Intellectual property**

Outputs arising from research may include books, articles, lectures, web content, galleries or exhibitions. All outputs must report research accurately and with appropriate references to the contribution of all contributors and adhere to the V&A Open Access policy and any relevant funder policies. In collaborative research projects all parties must ensure there is clarity and agreement prior to the start of the project regarding ownership and use of any arising intellectual property. This includes the results of the research, any data or samples used or created in the course of the research and questionnaires, interviews and transcripts, recordings and images.

### **x. Submitting research funding applications**

Principal Investigators will take all reasonable measures to ensure the accuracy of information contained in applications for funding. Any research projects involving V&A staff or students must go through the V&A's Ethical Approval Process for Research Projects before the research can begin.

### **xi. Use of Artificial Intelligence (AI)**

This is a fast-moving field and V&A researchers must work in line with the V&A's AI principles and comply with the V&A policy on acceptable use of AI. Researchers are also encouraged to familiarise themselves with the UK Research Integrity Office (UKRIO) practical guide for '[Embracing AI with integrity](#)' on Researchers must comply with the [UKRI policy](#) on the use of generative artificial intelligence (AI) in the application and assessment process

## **2.1 Research Misconduct**

Researchers must not commit any act of Research Misconduct. This is defined as non-compliance with the Museum's Research Ethics Policy and includes, but is not restricted to:

- Plagiarism - the copying or use of ideas, data or text without permission or acknowledgement.
- Fraud - deliberate deception, involving the invention of data or the fabrication of results.
- Collusion - aiding or attempting to aid, or obtaining or attempting to obtain aid from another person in an examination, and aiding in the concealment of research misconduct by others.
- Interference - intentional damage to, or removal of, the research-related property of another.
- Non-compliance - the deliberate failure to comply with obligations to the Museum, sponsor, funding body, professional body or partner, including accounting requirements, ethics, and health and safety regulations.

Research Misconduct is a highly serious disciplinary matter. It does not include honest error or honest differences in the design, execution, interpretation or judgement in evaluating research methods or results; or misconduct unrelated to the research process.

All members of the V&A have a responsibility to report Research Misconduct, where they have good cause to believe it is occurring. Members should report an allegation to their line manager, with reference to the Director of the V&A Research Institute, National Art Library and Archives. The Museum will investigate allegations or complaints about Research Misconduct in line with the disciplinary procedures described in the Disciplinary Policy on the People Hub and with due regard to the obligations placed on the V&A by any third party(ies) or the law.

Suspensions reported in confidence and in good faith will not lead to disciplinary proceedings against the person making the complaint. However, in the event of a frivolous, vexatious and/or malicious allegation the Museum may consider recommending that action be taken against the Complainant.

Prior to making any formal allegation, sources of advice and support for V&A members include:

- Fellow researchers and colleagues
- Research Grants Manager
- Supervisors
- Mentors
- Keepers, Heads of Department or Section
- Director of V&A Research Institute, National Art Library & Archives
- People Team Advisor or Partner

# Terms and Definitions

The policy adopts the definition of research used in the revised [Concordat to Support Research Integrity \(2019\)](#), published by Universities UK<sup>7</sup> 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.’<sup>7</sup>

All V&A staff may do research, regardless of whether this is formally listed in a job description or volunteer agreement. Research outputs may vary, from published papers to catalogue entries to exhibitions (and beyond), but their shared aim is to enhance the quality of the dialogue between our museums and audiences.

Within the Museum setting some of the above work takes place within the context of research, informing the identification, selection and acquisition of objects into the Museum’s collections and exhibitions. Research may focus on collections, or audiences, or both. Audience research may address (for example), the diversity of audience needs and behaviour; the effectiveness of exhibits, programmes and other public provision; and issues of cultural policy. Research also plays an active part in the conservation, presentation and interpretation of objects in the galleries and is essential in providing appropriate levels of documentation.

All research supports the creation of knowledge whereby information about objects in the Museum’s collections is enriched by a broader comprehension of their wider historical context and their social, intellectual, technological and aesthetic significance. The central types of knowledge required by the Museum are the ability to identify and care for objects in the collections and to enhance the interpretation of their meanings for diverse audiences. Members of staff and students must, therefore, maintain a constant dialogue between the objects, archival material and the relevant secondary literatures, between data and methods of care and interpretation, and between the Museum and its users. Audiences may themselves be active researchers, as students, academics, or specialist professionals, as well as informed participants.

<sup>7</sup> Universities UK Concordat to Support Research Integrity (2019)

Terms used in this policy	Definition
Research	<p>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. (<a href="#">Concordat to Support Research Integrity (2019)</a>)</p>
Research Integrity	<p>There is no universal definition of research integrity, however the Concordat identifies five core elements:</p> <ol style="list-style-type: none"> <li>I. <b>‘Honesty</b> in all aspects of research, including in the presentation of research goals, intentions and findings; in reporting on research methods and procedures; in gathering data; in using and acknowledging the work of other researchers; and in conveying valid interpretations and making justifiable claims based on research findings’;</li> <li>II. <b>‘Rigour</b>, in line with prevailing disciplinary norms and standards, and in performing research and using appropriate methods; in adhering to an agreed protocol where appropriate; in drawing interpretations and conclusions from the research; and in communicating the results’;</li> <li>III. <b>‘Transparency</b> and open communication in declaring potential competing interests; in the reporting of research data collection methods; in the analysis and interpretation of data; in making research findings widely available, which includes publishing or otherwise sharing negative or null results to recognise their value as part of the research process; and in presenting the work to other researchers and to the public’;</li> <li>IV. <b>‘Care and respect</b> for all participants in research, and for the subjects, users and beneficiaries of research, including humans, animals, the environment and cultural objects. Those engaged with research must also show care and respect for the integrity of the research record’; and</li> <li>V. <b>‘Accountability</b> of funders, employers and researchers to collectively create a research environment in which individuals and organisations are empowered and enabled to own the research process. Those engaged with research must also ensure that individuals and organisations are held to account when behaviour falls short of the standards set by this concordat’.</li> </ol>

Researcher	<b>“Researcher”</b> is understood here as any person who conducts research, including but not limited to: as an employee; as an independent contractor or consultant; as a research student; as a visiting scholar or honorary fellow; or as a member of staff on a joint or honorary contract.
Ethics	<b>“Ethics”</b> is defined by the Oxford English Dictionary Online (2023) as “A system or set of moral principles; (in weaker sense) a set of social or personal values”