

UAL annual statement on research integrity: 2023-2024

Executive summary

The Concordat to Support Research Integrity sets out the requirement for universities to produce an annual statement on research integrity to be reported to its governing body and subsequently made publicly available. The report should detail the institutional approach to research integrity. This draft statement sets out details of UAL's current research and KE integrity arrangements and provides a summary of actions and activities undertaken during the 2023/24 academic year to support and strengthen understanding and application of research integrity issues.

Overview

[University of the Arts London](#), an art and design higher education institution formed of [six Colleges](#): Camberwell College of Arts, Central Saint Martins, Chelsea College of Arts, London College of Communication, London College of Fashion, Wimbledon College of Arts, and four Institutes: the [Creative Computing Institute](#), the [Decolonising Arts Institute](#), the [AKO Storytelling Institute](#) and the [Fashion Textiles and Technology Institute](#).

UAL supports all those engaged in research, and supporting research, within the University, to conduct their activities with integrity, to ensure that all research, and the application of research, carried out at or on behalf of the University, is conducted in accordance with the appropriate ethical, legal and professional frameworks, obligations and standards. By protecting the dignity, rights, safety and well-being of research participants; the safety and reputation of researchers; and the reputation of the University as a body that endorses research of the highest standard, we can help to promote public trust in University research.

Key to this is establishing and maintaining an institutional culture and environment that facilitate research integrity, supported by policies and processes that are proportionate, appropriate to our culture and values, and the activities that we carry out.

This statement sets out details of our current research and knowledge exchange (KE) integrity arrangements, and an update on the work we have been doing to support and strengthen research and KE integrity at UAL over the past year.

The Concordat to Support Research Integrity

Our [Research Strategy 2023-2028](#) sets out our goals to build a stronger research culture and to increase the quality and impact of our research (p1). To support our programme to maintain the highest standards of research and KE integrity, the University is committed to the principles set out in the revised [Concordat to Support Research Integrity](#) (2019). The Concordat provides a national framework for good research conduct and its governance, and compliance is a requirement of eligibility for funding from UKRI and the Research Councils.

The seven [Nolan Principles of Public Life](#) set out the ethical standards expected of those working in the public sector, including all those appointed to work in education, and the Concordat provides an interpretation of these principles within the research context.

There are five commitments outlined in the Concordat:

1. Upholding the highest standards of rigour and integrity in all aspects of research
2. Ensuring that research is conducted according to appropriate ethical, legal and professional frameworks, obligations and standards
3. 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
4. Using transparent, timely, robust and fair processes to deal with allegations of research misconduct when they arise
5. Working together to strengthen the integrity of research and to reviewing progress regularly and openly.

Under Commitment 5 of the Concordat the University agrees to produce an annual statement to be reported to its governing body and subsequently made publicly available. The report provides a summary of actions and activities that have been undertaken during the 23/24 academic year to support and strengthen understanding and application of research and KE integrity issues. It provides assurances that UAL's codes, procedures and practices for research and KE integrity continue to be appropriate to the needs of the University. It provides information on formal investigations of research misconduct and lessons learned, and how the University is working to embed a culture which enables staff and students to report instances of research misconduct.

The UK Research Integrity Office [annual statement on research integrity template](#) has been used in the drafting of this report.

UAL's Research Integrity Statements are made publicly available on the UAL website.
<https://www.arts.ac.uk/research/research-standards-and-ethics>

Section 1: Key contact information

Question	Response
1A. Name of organisation	University of the Arts London
1B. Type of organisation	Higher education institution
1C. Date statement approved by governing body	Audit Committee 17.09.24 University Research Committee 02.10.24
1D. Web address of organisation's research integrity page	https://www.arts.ac.uk/research/research-standards-and-ethics

1E. Named senior members of staff to oversee research integrity	<p>Professor Trevor Keeble, Pro Vice-Chancellor Research, Knowledge Exchange and Enterprise</p> <p>Dr Sharon Cole, Director Research management and Administration</p>
1F. Named member of staff who will act as first point of contact for anyone wanting more information on matters of research integrity	<p>Nicole Palmer, Research Ethics and Integrity Manager</p> <p>n.palmer@arts.ac.uk</p>

Section 2: Promoting high standards of research integrity and positive research culture

2A. Description of current systems and culture

Policies and systems

Oversight of research ethics and integrity for research and knowledge exchange (KE) activities at UAL is the responsibility of the Research and KE Ethics Sub-Committee (RKEESC). RKEESC is a sub-committee of the University Research Committee (URC), with delegated authority *'[t]o set and monitor standards for research ethics'*, as set out in the URC Terms of Reference.

The RKEESC Terms of Reference set out its purpose as: *'[t]o consider and advise as appropriate on ethical issues relating to research and knowledge exchange. To ensure that the Code(s) of Practice on Research Ethics is followed, regularly reviewed, and to provide robust ethical governance for both research and knowledge exchange activities.'* Within that purpose, RKEESC is responsible for:

- Establishing codes of practice on research and KE ethics, promoting, and regularly reviewing them in line with developments in the sector
- Establishing an infrastructure to facilitate adherence to ethical principles, thereby safeguarding the interests of all those involved
- Carrying out reviews of ethics applications deemed *'more than minimal risk'*
- Monitoring the operation of the devolved review of applications deemed *'minimal risk'* by College research and KE committees
- Advising other research and KE committees, and the Educational Ethics Sub-Committee, on matters of ethics
- Monitoring ethics training for research degree students.

To support this work, appropriate policies and codes of practice are in place and are available on both our internal and external webpages:

- [UAL Code of Practice on Research Ethics](#)
- [UAL Code of Good Conduct in Research](#)
- [Procedure for the Investigation of Allegations of Misconduct in Research.](#)

Research ethics review

Arrangements and responsibilities for ethics review and monitoring are set out in a guidance document that is available on the internal research ethics webpages on Canvas: *UAL Guidance for Research Ethics Approval*.

The initial assessment of research ethics applications is devolved by RKEESC to College, Institute and research and KE committees (for staff applications), and College and Partner Institution research degrees sub-committees (for research student applications). For applications that are deemed to raise *minimal risk*, the full review is completed by the College committees and reported to RKEESC. Applications where the initial review has identified issues that raise *more than minimal risk* are referred for full review to RKEESC.

The Guidance on Research Ethics sets out the procedure for considering the ethical dimensions of a research project, provides advice on mitigating ethical risk, and sets out guidance on designing participant information and consent processes and associated documentation. The Guidance also clarifies that following an ethics decision, research projects may be monitored to assess adherence to the approved protocol, and may be called in for review at any time by either the relevant College research body or RKEESC. There is a process to assess amendments where the scope of a project changes after the ethics decision.

The Educational Ethics Sub-Committee (EESC) oversees the ethics of undergraduate and taught postgraduate research, reporting to the Education Enhancement Committee, and reporting for information to RKEESC.

Culture, development and leadership

The Code of Practice on Research Ethics sets out the guiding principles researchers should follow when conducting their research and KE activities, and also their obligations and responsibilities in regard to assessment of risk, maintaining the highest standards of academic integrity, complying with relevant codes of practice and rules of engagement, and standards of professional practice. It describes responsibilities on seeking consent, respecting privacy and rights to confidentiality, appropriate data protection measures, awareness of and compliance with any relevant legislative and policy requirements, and transparency on contractual arrangements and potential conflicts of interest.

The Code of Good Conduct in Research sets out the standards of integrity expected of UAL researchers by outlining their responsibilities in:

- maintaining standards of academic practice and integrity in all aspects of research;
- being accountable to society, to participants, to their profession, to the University and to funders of the research;
- being responsible for the conduct and publication of their research, and for the activities of any staff or students under their direction;
- being accountable the safety of those associated with their research projects;
- being responsible for the probity of financial management;
- being aware of all legal, regulatory and ethical requirements laid down by the University or any other relevant bodies.

The Code also establishes the responsibilities of the University's Executive Board, Deans, Associate Deans of Research, Research Centre Directors, Institute Directors and Research Management and Administration:

- to ensure that a climate is created that allows research to be conducted in accordance with good research practice;
- to make adequate provision in training and development for all researchers, allowing them to acquire necessary skills to successfully and efficiently fulfil their research and project management responsibilities;
- to provide training for supervisors in supervisory skills through a structured framework of staff development for research staff.

Membership of RKEESC includes representation from across the University, in the areas of both research and knowledge exchange. RKEESC members represent the Committee on their respective College committees, thus ensuring that research and KE ethics and integrity remains a standing agenda item.

Devolution of research and KE ethics review to Colleges and Institutes ensures local ownership, with a view to embedding a culture of integrity at the local level, by supporting local awareness and knowledge, while maintaining central oversight. While research and KE ethics and integrity procedures, requirements and guidance are set out in policy and guidance documents, these are underpinned by the bespoke support available from the Research Ethics and Integrity team.

Training and development

Online training in research integrity provided by global training provider Epigeum is available for researchers to access at their own convenience. This can be helpful for research degree students, in particular, who may not yet be at a stage when they are actively engaging with the review process when the in-person training sessions are provided. The Epigeum course includes multimedia content, interactive activities, and real-life examples, and is delivered via eight core modules that can be accessed as needed:

- Good research conduct
- Irresponsible research practices
- Planning your research
- Managing and recording your research
- Data selection, analysis and presentation
- Scholarly publication
- Professional responsibilities
- Communication, social responsibility and impact.

Research and KE ethics and integrity is also integrated into research training programmes for UAL Early Career Researchers and academic staff undertaking UAL's PgCert and MA Academic Practice in Art, Design and Communication courses, which are open to all staff who teach and/or support student learning.

Research degree students receive tailored training as part of the Researcher Development Programme via the *Becoming a Researcher* sessions.

Taught research students receive training in ethical issues specific to their research areas within their Colleges and Departments.

Communications and engagement

UAL's approach to research and KE ethics and integrity is set out on dedicated [research standards and ethics](#) pages on our public facing website. These pages include the statutory documents the *Code of Good Conduct in Research*, the *Code of Practice on Research Ethics*, and the *Procedure for the Investigation of Allegations of Misconduct in Research*, as

well as a link to the UAL Research Strategy and the archive of annual statements on research integrity. Also included are links to documents on research data management, the Concordat on researcher development, and details of the individuals responsible for research and KE ethics and integrity, both centrally, and in the Colleges. There is also a contact link for the person responsible for research and KE ethics and integrity, to which any concerns can be directed, as is a requirement of the *Concordat to Support Research Integrity*.

For staff members, information is included on our internal Canvas pages, including the relevant policies and codes of practice, the application form for research ethics review, and a guidance document to support those drafting an application for review.

Educational Ethics has produced guidance on ethical issues in art and design for staff members supporting teaching and learning, and this is available on our internal Canvas pages. There are links to resources for students which directly address the specific issues art and design practitioners may experience. Students can also access information on research and KE ethics and integrity via the virtual learning environment.

2B. Changes and developments during the period under review

Roadmap to best practice

Following appointment as a new post in 2023, the Research Ethics and Integrity Manager carried out a review of research and KE ethics and integrity systems and processes currently in place at UAL. All aspects of research and KE ethics and integrity at UAL were reviewed, and the findings set against best practice, drawing on previous career experience, evidence from other institutions, and benchmarking documents such as the UKRIO/ARMA document [*Research Ethics Support and Review in Research Organisations*](#) (2020).

The review findings were reported under sections covering:

- Governance of research and extent of institutional oversight
- Policies and codes of practice
- Processes
- Training
- Culture and practice
- Documents and guidance
- Websites and communication.

The report was presented to the University Research Committee (URC) at which it was welcomed and approved.

The next stage in the process has been development of an action plan to identify the programme of work, led by the Research Ethics and Integrity Manager, to be undertaken to improve and strengthen research and KE policies, processes and procedures, in line with legislative and policy requirements, and best practice in the sector. The action plan has been drafted using the seven key areas used to structure the report, outlining short-, medium- and longer-term actions, and has been presented at URC and other relevant University and College committees.

Maximising efficiency and effectiveness of current processes

Research ethics review

As we increase our research capacity in line with our [Research Strategy 2023-2028](#), numbers of applications for research ethics review have also increased. While work continues on longer-term actions to adapt our research ethics review procedures, in the short term we have concentrated on ensuring that current processes are operating as efficiently and effectively as possible, so that we can continue to ensure the research and KE projects we support are undertaken ethically, but without subjecting researchers to systemic delays and complications.

Joining the Research Ethics and Integrity Manager, a Research Ethics Administrator has been appointed with responsibility for managing the administration of staff applications for ethics review across all Colleges. This has resulted in standardisation of the process across the University, and parity of experience for all reviewers and applicants.

Appointment of these two new roles with direct responsibility for research and KE ethics and integrity has also enabled provision of tailored advice to researchers designing projects and drafting applications for ethics review. Access for applicants to specialist support and advice on ethical project design, identifying and mitigating ethical implications, and navigating regulatory requirements, has led to an improvement in the quality of applications submitted. Administrative checks conducted on submission have resulted in fewer process errors in applications, such as missing information or discrepancies and inconsistencies. In addition to enabling reviewers to spend more time concentrating on their primary task of reviewing the ethical implications of proposed projects, rather than highlighting problems and missing information, this has also improved the efficiency of the process, and reduced delays, by increasing the numbers of applications that receive a favourable opinion at first attempt.

Upgrades have also been achieved in the digital structures underpinning the review process, which has further improved the efficiency and effectiveness of procedures. This has been achieved using existing software, and includes:

- A safe, secure and simple document sharing environment has been developed to facilitate the ethics review process. This has improved the functional arrangements for reviewers, and enhanced tracking and oversight
- A searchable database of ethics applications has been created, enabling improved oversight and reporting
- A system has been established to capture and analyse research ethics questions and queries, and common errors in applications, which will help to inform priorities for development of guidance and training materials.

Implementation of these measures aimed to enhance the efficiency and effectiveness of existing processes has already resulted in an improvement in turnaround times for ethics applications of around 20%, on average.

UAL engagement relating to research ethics and integrity

The Research Ethics and Integrity Manager has carried out a programme of meetings with key stakeholders, and has attended a number of University-level and College committees, to present the work that is being undertaken to improve and strengthen research and KE policies, processes and procedures, in line with legislative and policy requirements, and best practice in the sector. Key areas of progress include work towards situating ethics and integrity within existing established University procedures, including:

- Working with KE and Public and Community Engagement (PCE) stakeholders:
 - to make identifying potential ethical implications with these activities and clarifying requirements for ethics review easier for practitioners
 - to ensure that procedures are proportionate to the level of ethical risk and compatible with the agile ways of working and short turnaround times common with these kinds of projects
 - to start work on developing a workflow for KE and PCE projects to simplify the pathway through governance requirements and to ensure that ethics review fits within other established procedures
- Working more closely with colleagues involved in supporting academics to develop research funding bids, to ensure that ethical implications are considered at the earliest stages of project development, and researchers are supported to navigate ethics and governance review requirements. The Research Ethics and Integrity Manager attends kick-off meetings for externally funded projects to outline procedures for ethics review, highlight any initial observations on ethical implications, and establish arrangements for ongoing advice and support on ethics and integrity
- Working with the Doctoral School:
 - to enhance provision of training in research and KE ethics and integrity within the Researcher Development Programme via the *Becoming a Researcher* sessions, to ensure information is timely and captures cohorts joining the University at different time points
 - to establish bookable drop-in sessions for research degree students to receive one-to-one ethics consultation
 - to contribute to Open Doctoral School events to ensure that research and KE ethics and integrity are included as discussion topics
- Establishing a programme of regular drop-in presence in Colleges and Institutes to provide individual advice and guidance as needed
- Working with colleagues in other professional service departments to ensure ethics and integrity arrangements are aligned with existing procedures and governance requirements
- Ensuring discussion of ethics and integrity in relation to research and KE feeds into wider University discussion of ethics, to support the work coordinating the approach to ethics and integrity across UAL.

Training

Focus to date has been on updating training provision for research degree students. The Research Ethics and Integrity Manager has delivered sessions on the Research Network University of the Arts London (RNUAL) training programme which have been well received. Incorporating opportunities for reflexive discussion of wider ethical issues in art and design research, alongside statutory information on ethical research design, ethics review pathways, and legislative requirements, proved popular with students. This provided a supportive and non-judgemental space in which difficult issues and best practice approaches for resolving them could be shared.

Sector engagement relating to research ethics and integrity

The value of networking, to facilitate the sharing of best practice, is recognised, and we actively seek opportunities for collaboration with colleagues at partner institutions. Some recent activities include:

- The Research Ethics and Integrity Manager presented a poster at the 2024 Association of Research Managers and Administrators conference, and this led to opportunities to meet with colleagues from other UK universities after the conference, who are working on similar projects
- We have joined a local network, the London Research Integrity Consortium, and look forward to continuing to contribute to discussions going forward
- Maintenance of networks established at previous institutions, and connections via other colleagues, have led to opportunities to meet counterparts and teams from other research organisations and arts institutions, to discuss approaches to common issues and to share best practice
- Continued membership subscription to the UK Research Integrity Office provides opportunities for networking, consultation and attendance at training and information events as well as access to archived presentations. Access to guidance and template documentation is particularly useful during this period of review and development of updated procedures
- The opportunity to join community of practice events hosted by Epigeum has been useful in enabling learning from the experiences of other institutions in techniques for promoting and monitoring take-up and engagement of training.

2C. Reflections on progress and plans for future development

The creation and establishment of an ethics team within UAL Research Management and Administration has been a significant action with regards to enhancing the culture of research integrity at UAL. The action plan that has been developed as a result of the report on the review of research and KE ethics and integrity systems and processes currently in place at UAL has provided a clear roadmap towards best practice. In addition, having named individuals with expertise in all aspects of research ethics, governance of research, and ethics administration, has helped to encourage reflection and discussion on both a local and an institutional level.

Progress on actions identified in the action plan has been good, and is proceeding according to schedule, with the following challenges identified:

- The [Research Strategy 2023-2028](#) sets out our intention to increase our research capacity and grow our research income. However, as an institution that has previously had a predominantly teaching focus, work is required to develop the skills of those engaged in research and the infrastructure supporting research activities. This requires more intensive groundwork to underpin plans for progress to enhance research integrity standards and to embed a culture of research integrity
- With existing institutional experience having historically been focused on areas outside of research, there can be a lack of research-specific knowledge amongst professional services staff members working in wider University departments, and this has led to unanticipated delays in the collaborative development of policy and guidance that is research specific
- An ongoing challenge remains the ability to deliver the training required, at scale, to upskill researchers and professional services staff.

Future plans

- **Training:**
 - Work will continue on scoping gaps and requirements in training provision for ECRs and more experienced staff members, including situating ethics within training on research methods. Formal sessions on research and KE ethics

and integrity and navigating ethics review processes will be designed and delivered to staff in collaboration with the Research and KE Staff Development team

- Tailored training on ethics review for committee reviewers will be offered for those needing to upskill
 - Enhanced and targeted promotion and awareness-raising of existing online research integrity training provision, and improved monitoring and reporting of training uptake
 - Development of a programme of periodic workshops for in-depth discussion of ethics and integrity topics of interest
 - Collaboration between the ethics team and Educational Ethics leads to facilitate peer sharing of knowledge around ethics and integrity.
- **Ethics review:**
 - Initial work to maximise the efficiency and effectiveness of current processes, within the existing framework of ethics review, will be continued, within a continuous improvement model
 - Discussions will continue on further developing procedures to ensure they are proportionate, tailored to UAL activities, and fit within existing processes to ensure engagement is maximised.
 - **Documentation:**
 - Existing policies and codes of practice on research and KE ethics and integrity will be revised and updated in line with statutory requirements and best practice in the sector, incorporating stakeholder input
 - Work will continue to scope existing UAL guidance documents to identify gaps in provision. Horizon scanning will help to detect potentially important developments in the sector, to feed into policy and guidance design. New guidance documents will be drafted, incorporating the specialist knowledge and expertise already available amongst UAL colleagues, best practice in the sector, and external expertise, where necessary.
 - **Communication and engagement:**
 - Work will continue to update our external and internal research and KE ethics and integrity websites, ensuring statutory requirements are addressed and met. Over the medium-term, internal web resources on research and KE ethics and integrity will be developed to provide a library of guidance and documents to include templates and procedure notes, to support researchers to navigate existing and novel issues. Longer-term plans include establishment of a timetable for communications activity to promote awareness and engagement with research and KE ethics and integrity
 - It is planned to investigate establishing a community of practice in research and KE ethics and integrity specific to art and design, to include members from UAL, our partner institutions, and other interested parties drawn from further afield. This could offer a valuable opportunity for colleagues facing similar issues and challenges, and working in similar areas, to share best practice and discuss shared problems and issues. The continued evolution of research ethics and integrity into increasing application within art and design, offers real opportunities for collaboration, to ensure initiatives are designed in the most appropriate, proportionate and supportive way possible.

Section 3: Addressing research misconduct

3A: Statement on processes that the organisation has in place for dealing with allegations of misconduct

The University's *Procedure for the Investigation of Allegations of Misconduct in Research* sets out examples of bad research practice that can lead to research misconduct, and establishes the respective responsibilities of researchers, research students, and supervisors, in relation to their specific roles in ensuring the ethical conduct of research. It includes details of the ways concerns about research misconduct can be reported, and the procedures that must be followed for investigation of allegations of research misconduct.

There are a number of different routes by which anyone can report allegations of misconduct, including a whistleblowing process, to ensure that Complainants feel empowered and supported to raise concerns confidentially. The University is also committed to protecting its staff and students, and will take action in the event of malicious or vexatious allegations.

When a formal allegation has been made, the Procedure will be followed to conclusion, even in the event that the Respondent has left or leaves the jurisdiction of the University, either before the investigation has been concluded, or before the allegation was made.

The respondent has the right of appeal should the matter be referred to the University disciplinary process.

3B: Information on investigations of research misconduct that have been undertaken

There were no formal investigations of research misconduct in 2023/2024.