

HRP Research Ethics Policy

Key Facts and Purpose

- This policy applies to all HRP employees, volunteers, research students and visiting researchers, who will hereafter be referred to as researchers unless otherwise stated.
 - This policy sets out the standards of research ethics which are expected of HRP researchers.
 - This policy is approved through HRP's Research Strategy Board and the HRP Trustees.
 - This policy is overseen by HRP's Research Lead based in the Curators' department.
-

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

Contents

1. Introduction	3
2. Scope of this Policy	4
3. Procedure for Obtaining Ethical Approval	5
4. During the Project	8
5. Ethical Considerations	8
5.1 Sensitive Histories	9
5.1.1 Terminology	9
5.1.2 Collections.....	10
5.1.3 Communities.....	10
5.1.4. Disseminating Research.....	11
5.2 Human Participants	11
5.2.1 Protection and Consent.....	11
5.2.2 Oral Histories	12
5.2.3 Vulnerable Groups.....	12
5.2.4 Data Handling	13
5.3 Researcher Welfare	13
5.3.1 Sensitive Histories	14
5.3.2 Researcher Training	14
5.4 Cultural Heritage.....	14
5.4.1. Materials Research.....	15
5.4.2. Archaeology	15
5.5 Human Remains.....	15
5.6 The Natural Environment	16
5.7 Non-Human Animal Subjects	16
5.8 Artificial Intelligence.....	17
5.8.1. AI Content Training.....	17
5.8.2 AI Tools	18
6. Further Guidance	18

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

1. Introduction

Research is a core activity of Historic Royal Palaces (HRP) and supports our commitment outlined in our [Research Strategy 2022-2027](#) to conduct authoritative research that deepens our knowledge of our properties and collections, provides the evidence and expertise to make informed decisions, develops diverse and memorable visitor experiences, and helps us face the societal challenges of today. Following good research practice and adhering to ethical standards is essential in our work, ensuring public confidence and trust in both the research process at HRP and our research outputs.

Research ethics centres on the principle of acting appropriately in the circumstances in order to avoid harm. This is important for upholding participants' safety, protecting cultural heritage and the historic environment, ensuring research is transparent, reducing risks to researchers, and enhancing HRP's external reputation as an Independent Research Organisation (IRO).

This **Research Ethics Policy** sets out the standards of research ethics which are expected of HRP researchers and is designed to ensure that any ethical issues in research projects are appropriately managed.

The policies outlined in this document draw on a range of ethics policies at universities and Independent Research Organisations (IROs), including:

- The National Archives' [Code of Conduct for Research Integrity](#) (2023)
- The Wellcome Trust's [Responsible Conduct of Research](#) (2022)
- Historic England's [Research Ethics Policy and Procedures](#) (2023)
- The Museum Association's [Code of Ethics](#) (2016)
- The V&A's [Research Ethics Policy](#) (2015)
- The University of York's [Code of Practice on Ethics](#) (2022)
- The University of Southampton's [Ethics Policy on Cultural Heritage](#) (2018)
- Newcastle University's [Ethics Toolkit for Principal Investigators](#) (2018)
- The [ICON Heritage Science Group Ethical Sampling Guidance](#) (2019)

Failure to comply with this Policy may give rise to an allegation of **Research Misconduct**. In the event of misconduct being found, action may need to be taken in line with the relevant procedures at the researcher's organisation. Depending on the circumstances and depending on the outcomes, action may result in dismissal from the researcher's employment. In the case of volunteers, action may result in the removal of their volunteer placement, or, in the

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

case of independent visiting researchers (without an employer), termination of their placement or fellowship with HRP.

HRP's researchers, collaborative PhD students, visiting research fellows, placement students, and volunteers undertaking research with HRP can expect to receive guidance and support on compliance with the organisation's expectations of research ethics from the HRP Research Lead.

HRP's Research Lead is responsible for the maintenance of this document and HRP's Research Strategy Board is responsible for authorising any alterations which are made to the policy therein.

The policy was presented to the Research Strategy Board for approval on 03/10/2024.

2. Scope of this Policy

This Policy is intended as a comprehensive guide to the expected standard of research ethics at HRP. While the **Good Conduct in Research Policy** sets out guidelines for best practice in conducting research, this **Research Ethics Policy** is designed to help all researchers undertaking research with HRP (as defined under 'Key Facts and Purpose', hereafter referred to as 'researchers') identify and understand ethical considerations in research. It also sets out the internal procedures for ethical review at HRP.

In order to avoid unnecessary duplication, in instances where there is overlap with another existing HRP policy (such as the Human Remains Policy), researchers are referred to the full existing policy (which is available for HRP employees to read on the HRP Intranet). HRP volunteers, placement students, and third-party researchers without direct Intranet access should be provided access to these through their HRP supervisor or the HRP Research Lead as required.

Who does it apply to?

This Policy applies to all employees conducting research for HRP.

Volunteers undertaking research for HRP should conduct themselves in accordance with this Policy, although it is the responsibility of their line manager or volunteer manager to ensure compliance and complete any necessary Ethics Assessment Forms.

Collaborative PhD students, external placement students, and visiting researchers employed by or matriculated at other institutions, including third-party contractors, will be governed by the research ethics policies at their own organisations, though they should, in the spirit of collaborative research, ensure that they have read and comply with this Policy. Researchers governed by external policies may be asked to agree to the HRP Research Ethics Policy as

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

part of their collaboration or contractual agreement with HRP, at the discretion of the HRP employee leading the project. In the case of any discrepancies between this Policy and their own organisational policy, these should be discussed and resolved in a formal collaboration agreement before the research commences. Similarly, if engaging with external collaborators, the named HRP employee acting as partner on the project is responsible for ensuring that a unified approach to research ethics is agreed upon before the project starts and set out in a partnership agreement, which should be read and signed by all parties before research commences.

(Note: research by students undertaking the joint HRP/QMUL MA in Heritage Management is governed by QMUL policies and processes in the first instance).

What does it apply to?

Research ethics apply to all research activities, either undertaken by HRP alone or in collaboration with other research organisations and/or individuals. Activities may include, but are not limited to:

- Applications for research funding
- Generation and analysis of data
- Publication of research findings
- Reviewing the proposals and publications of other researchers
- Student placements and fieldwork with HRP
- Evaluation activities, such as sending questionnaires to visitors or event participants

3. Procedure for Obtaining Ethical Approval

When proposing and planning research, it is important that researchers consider the full ethical implications of their research activities as early as possible and are fully transparent in communicating any potential ethical issues with the Research Team when obtaining ethical approval.

In order to support this, for each research project or activity, the lead HRP employee working on the project (or primary HRP supervisor, in cases of PhD studentships or placements) must complete the HRP Research Ethics Assessment form at the earliest opportunity. You must do this, regardless of whether you think your project has ethical implications or not.

Visiting researchers or other third parties must go through the appropriate process at their own organisation and demonstrate approval to the HRP Research Lead before they can commence research at or with HRP. The project may also be required to be assessed under

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

HRP's own ethical approval process. Please note that even where HRP is not leading the project, as per HRP's **Good Conduct in Research Policy**, if the project involves consulting HRP's collections or collections in the care of HRP, the HRP project partner lead (or supervisor in the case of student placements or fieldwork) is expected to undertake due diligence by ensuring that a review of the collections considering ethical questions has taken place by following the process set out below.

Independent visiting researchers (without an employer), who wish HRP to act as their host institution or project partner for the duration of their research, should complete the process as outlined below in order to ensure that ethical approval has been granted for their project before research commences. This process should be led by the lead HRP employee on the project.

Volunteers, PhD students, placement students, visiting researchers, or third-party contractors should not undertake this process themselves, which should always be led by the lead HRP employee working on the project.

Stage 1: Completion of the Research Ethics Assessment Form

HRP employees should complete the Research Ethics Assessment Form and submit it to the HRP Research Lead. Use the guidance on potential areas of ethical concern in this document to help you complete the Assessment Form.

Stage 2: Ethics Assessment Form Review

The HRP Research Lead will undertake an initial review of the Assessment Form and categorise the project under one of the following fields:

- No ethical issues
- Minor ethical issues
- Moderate ethical issues
- Serious ethical issues

Proposals designated as having 'no ethical issues' will be given permission to proceed with no further input.

Proposals designated as having 'minor ethical issues' will receive advice from the Research Lead, who will consult with colleagues as appropriate, and be given permission to proceed. Further information may be requested as part of this process.

Projects with moderate or serious ethical issues will be asked to complete a Supplementary Information Form which will be reviewed by a Research Ethics Panel.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

Stage 3: Research Ethics Panel

The Research Ethics Panel will be convened as needed, and will consist of the Research Lead and at least two other panel members from the following list: Curator of Inclusive History; a Head of Team; a Head of Department. Other subject specialists will be brought in as appropriate.

The Research Ethics Panel will then review the application and consider whether the information provided in the application adequately addresses any ethical issues that may be encountered during or following research.

Stage 4: Panel Decision

Following review, the Panel will provide a report that outlines their decision and the grounds on which it was made. The Research Lead will keep a copy on file.

The possible outcomes are:

- **Favourable opinion:** the Panel grants its approval to the project and does not recommend any further changes.
- **Provisional opinion with additional conditions:** the Panel grants its approval to the project on the condition that aspects of the project are amended.
- **Further escalation required:** the Panel has substantial ethical concerns, which it believes should be reviewed at Executive Team and trustee level.

Stage 5: Executive Board and Trustee Approval

Projects escalated to the Executive Team and trustee level will be reviewed by a second Research Ethics Panel, which will be expanded to include all members of the original panel, plus the head of department and director of the lead HRP employee on the project, the HRP trustee representative who sits on the Research Strategy Board, and a further member of the Research Strategy Board as availability allows. In extreme cases – at the discretion of the approving director – the HRP CEO and further external advisors may be asked to join the panel.

The possible outcomes are:

- **Favourable opinion:** the Panel grants its approval to the project and does not recommend any further changes.
- **Provisional opinion with additional conditions:** the Panel grants its approval to the project on the condition that aspects of the project are amended.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

- **Unfavourable opinion:** the Panel does not give its approval and the project is not given permission to proceed.

4. During the Project

Once a project proposal has received full ethical approval, all researchers must remain accountable and continue to monitor ethics throughout the research lifecycle. Full transparency throughout the research lifecycle is expected, and if unforeseen issues arise, the lead HRP employee on the project should, in the first instance, speak to the HRP Research Lead, who may recommend an additional ethical review. If the project is led by an external researcher, they should seek additional ethical review through their own organisation, keeping the HRP Project Partner and HRP Research Lead copied into all correspondence.

If, over the course of the project, the HRP Research Lead deems that a study is being conducted in a way that does not accord with the conditions of the review or in a way which does not respect and protect the rights, dignity, and welfare of research participants, they will arrange a meeting of a Research Ethics Panel to resolve these issues. In an extreme situation, the Panel could withdraw its favourable opinion and recommend that research be discontinued. In this instance, the funding body should be informed, and the decision may be made to recoup funding.

Please note, that even if there do not appear to be any ethical concerns at the beginning of a project, if unforeseen ethical issues arise, then the lead HRP employee working on the project is still expected to be fully transparent and raise this with the HRP Research Lead, who will be able to offer appropriate guidance on managing these ethical concerns.

5. Ethical Considerations

The following section outlines possible ethical issues that may arise over the course of the development and implementation of a research project and states HRP's stance on how these should be managed. Researchers should use this as guidance when completing their Research Ethics Assessment Form or Supplementary Information Form in order to identify possible issues and suggest an appropriate course of action.

Potential Areas of Ethical Concern:

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

- **Sensitive Histories:** experiences of those who have been marginalised, silenced or discriminated against; terminology; collections; individuals and communities; research dissemination;
- **Human Participants:** protection and consent; vulnerable individuals or groups; data collection; oral histories;
- **Researcher Welfare:** health and safety; risk assessments; sensitive histories; researcher training;
- **Human Remains:** human tissue, or human remains that are over 100 years old;
- **Cultural Heritage:** material testing; archaeology
- **Natural Environment**

5.1 Sensitive Histories

At Historic Royal Places, we are committed to – and actively encourage – research which explores diverse histories and gives a voice to underrepresented communities and narratives.

Sensitive histories are those that explore the experiences of those who were marginalised, silenced, or discriminated against. That includes non-white British histories, the transatlantic slave trade, colonialism, women’s history, LGBTQ+ and non-binary gender identities, physical disability, and mental illness. But sensitive topics can also include studies that delve into traumatic aspects of past human experiences, such as bereavement, death and dying, suicide, illness and pain, abuse, and trauma.

At Historic Royal Palaces, sensitive histories also include those related to religion and religious conflict, with particular reference to Jewish histories (within the context of the Tower of London) and the conflict in Northern Ireland in relation to Hillsborough Castle and Gardens, including the period known as the Troubles.

Research projects that touch on sensitive themes today can generate powerful, thought-provoking, and meaningful studies. But such investigations are likely to generate emotionally charged responses and therefore particular care is required when conducting and discussing research, or when disseminating project findings. This is not only in the interests of protecting the readers and audiences of our research, but also considering the needs of researchers too.

5.1.1 Terminology

Historic terminology used in documents, archives, and collections, can be offensive. Researchers should assess the likelihood of encountering offensive terminology as part of

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

their research and develop plans for how this will be treated and used more widely as part of the project. This may include researcher training and welfare strategies.

For HRP's stance on inclusive language, researchers should consult [HRP's Inclusive Terminology Guide](#).

5.1.2 Collections

Researchers should consider whether the collections they plan to study raise ethical issues. These may include items which are racist or discriminatory; objects purchased with the proceeds of the trade in enslaved persons; items acquired illegally or in contested circumstances; or objects which raise cultural sensitivities. Clear plans and methodologies should be set out for how the research methodology will address these ethical issues.

If a member of HRP staff is providing access to HRP collections or collections within HRP's care to students, volunteers, and third-party researchers, there may be additional ethical considerations, such as how these collections may affect the wellbeing of the researchers consulting these collections. As per the HRP **Good Conduct in Research Policy**, HRP staff members may also need to consider whether a signed agreement is necessary to ensure transparency of research purpose and confidentiality, and to manage how research relating to these collections will be discussed and disseminated.

5.1.3 Communities

Researchers should also consider if their proposed research might affect whole communities or categories of people impacted by the research.

This includes conducting research with indigenous people or working with collections that once belonged to their community. For guidance, researchers are encouraged to consult resources produced by the UKRI-funded [People's Palace Project](#) and Manchester Museum's the [Return of Cultural Heritage to the Anindilyakwa People of Groote Eylandt Project](#).

Where archaeological sites, objects or materials are related to indigenous communities, researchers must ensure that these are not interfered with or removed without explicit consent of the indigenous groups concerned.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.1.4. Disseminating Research

Researchers should also be aware that sensitive topics may also generate powerful emotional responses in audiences, especially living communities whose identities have been shaped by a history of marginalisation, discrimination, or silencing.

The potential for sensitive or challenging histories to trigger negative emotional responses should be managed in a thoughtful and considered way when planning project outputs or public engagement activities.

5.2 Human Participants

5.2.1 Protection and Consent

Researchers must consider how best they can protect human participants involved in the research, and should factor in the following questions to their planning:

Is consent required?

In some instances, consent may not be required, for instance, if the information required is already in the public domain, although sometimes even if this is the case it might be appropriate in the spirit of consent to ask the subjects.

Have you explained the project?

Participants must be fully informed about the project and its implications. They also need to be informed as to the voluntary nature of consent and their right to refuse or withdraw it.

Have you offered anonymisation or redaction?

The researcher/s should also offer to anonymise or redact identifying details where appropriate.

Do you have written consent?

The researcher/s team should ensure that they have written consent from those involved and/or their representatives.

Do participants know what will happen to their data?

Participants should be informed how their data will be stored, used and disseminated, as well as who will be able to access that data.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.2.2 Oral Histories

Researchers who are researching and recording oral histories as part of a project should follow the [HRP Oral History Guidelines](#). In order to undertake oral histories in an ethical manner, HRP researchers are advised to adhere to the principles for oral history outlined by the UK Data Archive, that they follow:

- a duty of [confidentiality](#) (though not necessarily anonymity) towards informants and participants;
- a duty to protect participants from harm, by not disclosing sensitive information;
- a duty to treat participants as intelligent beings, able to make their own decisions on how the information they provide can be used, shared and made public (through [informed consent](#));
- a duty to inform participants how information and data obtained will be used, processed, shared, disposed of, prior to obtaining consent;
- a duty to wider society to make available resources produced by researchers with public funds (data sharing is required by some funders).

Researchers should also consider the specific subject matter that participants will be discussing and, if likely to cause possible distress, put in place additional support processes to account for this.

5.2.3 Vulnerable Groups

Where research involves vulnerable groups (such as children, individuals with special educational needs and disabilities, or marginalised communities), particular care should be taken to safeguard their welfare, interests, rights, and dignity. For guidance on HRP's policies on safeguarding these groups, researchers are advised to refer [to HRP's Policy Safeguarding Vulnerable Adults](#) and [Safeguarding Policy Children and Young People](#), available on the HRP Intranet.

HRP also recommends additional safeguards such as ensuring that researchers have undergone Disclosure and Barring Service (DBS) checks prior to working with these groups. Action should be taken to minimise any risks, even terminating the research if the risks outweigh the benefits. Participants and/or their representatives should be provided with details of a first point of contact if they should want to raise any concerns, which should be HRP's Research Lead.

Researchers should consider in advance how findings relating to the welfare of participants and/or third parties are to be handled, and these considerations should be incorporated into the research process.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.2.4 Data Handling

All researchers should take particular care when collecting, handling, and storing sensitive, classified, or personal data, in line with the Data Protection Act (2018). Consent forms and other identifying evidence must be stored securely and confidentially, and particular care should be taken to ensure that it is disposed of appropriately and held only as long as reasonably required for research purposes or funder requirements, in line with the legislative requirements.

Anybody handling sensitive, classified, or personal data should respect participant confidentiality, and any data and samples collected should be kept secure and anonymised where appropriate. A researcher who processes personal information about deceased individuals must still consider the Common Law Duty of Confidentiality.

As part of their induction, all HRP employees should have completed the e-learning modules on data handling. For collaborative doctoral students, the requirements for data protection are outlined in the collaborative agreement for their studentship. If they are in any doubt about data protection, they should speak to their supervisor at HRP who can provide access to the relevant training. As outlined in the **HRP Volunteer Handbook** that volunteers are expected to read when they start volunteering with HRP, volunteers also need to comply with data protection.

Other third-party researchers (such as placement students or visiting researchers) need to respect data protection legislation, however, it is the responsibility of their organisation to provide appropriate training. Independent visiting researchers should, if necessary, seek their own data protection training, and ensure they understand and respect data protection legislation in their research.

5.3 Researcher Welfare

When considering the welfare and interests of researchers, the lead HRP researcher on the research project or HRP Supervisor (in the case of collaborative PhD students or external placement students) should refer to and comply with **HRP's Health and Safety Handbook** as well as the basic requirements outlined in the Health and Safety at Work Act (1974). Where relevant, risk assessments should be carried out for those conducting or participating in a project, as well as for those affected by its conduct. If applicable, appropriate steps should be taken to mitigate any risks.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.3.1 Sensitive Histories

Particular consideration should be given to the emotional labour that researchers take on in examining challenging topics and the effect this research may have on their own mental health and wellbeing.

This should be factored into the research planning by taking measures such as:

- Ensuring researchers are aware of and understand the psychological risks associated with undertaking this research.
- Limiting how much time a researcher spends with difficult sources, using decompression activities, and having clear boundaries around working hours.

5.3.2 Researcher Training

The research team, or, at the very least, the Project Lead (whether an employee at HRP or an external collaborator), should have appropriate experience and/or training in the subject before research commences. If there are researchers in the project team with less experience in the given topic and/or if there are any gaps in their knowledge, the Project Lead is responsible for ensuring that relevant training is provided that will equip them to confidently conduct the research and discuss it in an appropriate manner.

Researchers should also be self-aware about their own authority and role as historians and history-makers and be prepared to reflect on their own ethical positioning in relation to the past.

5.4 Cultural Heritage

Cultural heritage (both tangible and intangible) should be safeguarded and treated with great respect. Researchers should ensure that their research enhances cultural heritage resources by increasing knowledge or understanding, refining methods of best practice, or creating new avenues for research. They should take special care to ensure that research does not cause any unnecessary loss or damage to artefacts, or the unnecessary or harmful loss of any information relevant to the understanding of cultural heritage.

HRP accepts that some research activities, such as archaeological excavation or scientific examination of an object, will result in some loss or physical alteration, but all loss or alteration must be proportionate to the aims of the project and fully justified in terms of the potential gain in knowledge and/or understanding. HRP also recognises that certain invasive investigations may be societally beneficial in terms of generating enhanced awareness of the cultural significance of heritage assets, as long as such work is appropriately and responsibly

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

conducted and reported. HRP also accepts that in some cases, such as archival work, selective preservation of material may be in the best interests of cultural heritage, and that occasionally the non-retention of information may be preferable for overriding ethical reasons such as confidentiality or avoidance of harm.

Researchers must acquire permission to conduct research from the relevant organisation and ensure any research they undertake complies with applicable regulations.

5.4.1. Materials Research

HRP works within the [Ethical Sampling Guidance and Flowchart](#) (2019), produced by the Icon (Institute of Conservation)'s Heritage Science Group, which offers guidance for anyone engaged with materials research and a helpful flowchart for making sampling decisions, as well as the British Standards Institution (BSI)'s [Conservation of Cultural Property: Methodology for Sampling from Materials of Cultural Property](#) (2012).

5.4.2. Archaeology

Researchers should act in accordance with the regulations developed by the [Chartered Institute for Archaeologists](#) (CIfA). All archaeological remains or artefacts which have been taken away from their original location must be carefully and appropriately transported and stored to ensure their long-term survival.

Where archaeological sites, objects or materials are related to indigenous communities, researchers should adhere to the World Archaeological Congress's [First Code of Ethics](#) (1990). For any finds or artefacts found (or allegedly found) in England, Wales and Northern Ireland after 24 September 1997, researchers must show that they were found in the course of activities in compliance with the principles of the [Treasure Act Code of Practice](#) (1996; revised 2002) and the [Code of Conduct of the National Council for Metal Detecting](#) (NCMD).

5.5 Human Remains

If researchers anticipate that their work will involve human remains in any way, they should read HRP's [Policy on Human Remains](#), which provides HRP's full stance on how to deal with remains in an appropriate and sensitive manner that is also compliant with the relevant legislation and adheres to best practice in regard to respecting different cultural sensitivities around human remains. The policy covers the excavation, research, and display of human remains.

Overall, researchers are advised to adhere to the principles outlined in the [DCMS Guidance](#), namely:

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

- Doing no harm: including not taking actions that would cause distress to a particular community;
- Respect for diverse religious, spiritual, and cultural beliefs and attitudes to remains;
- Respect for the scientific value of human remains and for the benefits that scientific inquiry may produce for humanity;
- Solidarity: furthering humanity through co-operation and consensus in relation to human remains;
- Beneficence: doing good, providing benefits to individuals, communities, or the public in general.

5.6 The Natural Environment

Where research could (directly or indirectly) cause harm to the environment, researchers must ensure that the benefit of research outweighs any risks and/or harm and must implement measures to reduce any risk/harm. Where research is conducted in areas that are valued by local communities, researchers should consult the HRP Communities Team to involve the local community and try to ensure that their research benefits the local community. Researchers should be sensitive to the impact on local communities and recognise that cultural sensitivities may impose constraints on their activities.

In the case of protected sites (such a UNESCO World Heritage sites, Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, or Special Areas of Conservation), researchers must acquire permission to conduct research at these sites from the relevant organisation and ensure any research they undertake complies with applicable regulations.

5.7 Non-Human Animal Subjects

In legal compliance with the [Animals \(Scientific Procedures\) Act 1986](#) ('ASPA'), researchers should be able to justify the use of animals in academic work and aim to minimise the number of animals used and ensuring their welfare. This commonly applies to scientific or medical research, but it may also be applicable in some humanities research, such as research involving re-enactments with animal subjects.

Where regulatory approvals, licenses and/or permissions are required, these should be secured in a timely fashion before the research starts. Animals protected under ASPA 1986 are living vertebrates other than man and living cephalopods. However, research on other organisms may raise ethical concerns if unusual procedures or particularly large numbers are involved, or if the organism is endangered in the wild.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.8 Artificial Intelligence

Artificial Intelligence (AI) refers to advanced computer programs capable of performing tasks usually associated with human intelligence like understanding speech or recognising images. HRP employees, collaborative doctoral students, and volunteers should follow the [guidance](#) set out by HRP Information Services, which gives guidelines for using AI. For general guidance on good practice using AI, see [HRP's Good Conduct in Research Policy](#).

For third party researchers, AI may be covered under their own organisational policies, but otherwise, they should follow the principles in this Policy when conducting research with or for HRP.

As a constantly evolving area of research, it can be difficult to foresee all possible ethical issues, however, researchers should familiarise themselves with relevant legislation and guidelines, such as UNESCO's *Recommendation on the Ethics of Artificial Intelligence* (2021), the National Lottery Heritage Fund's [Digital Heritage Leadership Briefing: Artificial Intelligence](#) (2023), and UKRI's [Generative Artificial Intelligence in Application and Assessment Policy](#) (2024).

It should be remembered the same rules apply to AI as other areas of research. Technology replicates societal biases, and researchers working with AI should remain mindful to ensure that their research does not replicate bias or discrimination. AI can also 'hallucinate' and generate information that is false or misleading.

5.8.1. AI Content Training

Respecting people, including their rights, dignity, and intellectual property, remains a key pillar of ethical AI research. AI does not exist separately from other research ethics policies, and content used to educate AI should be both legal and ethical. This means that materials used for machine learning must be free of rights (such as copyright) and do not contain confidential or privileged information. In line with HRP's guidelines, any data used with AI tools must be anonymised and must not violate any privacy regulations.

It should be noted that what constitutes the lawful use of protected content in the context of AI training is still [under review](#) by courts and legislators in the UK. However, researchers should carefully consider using sensitive materials for AI content, which includes, images or contributions by young people, items or knowledge of cultural significance to communities of origin, and ancestral remains, spiritual works or funerary objects.

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		

5.8.2 AI Tools

If using off-the-shelf tools produced by the private or third sector, researchers should ask the provider of the tool to confirm that it was developed using content free of rights or with appropriate permissions and, where relevant, check that the provider's terms of use comply with the organisation's privacy and data management duties.

6. Further Guidance

For support or guidance about any of the aspects of the research ethics described in this document, please contact HRP's Research Lead.

Name & Job Title	Role (Author, Reviewer, Approver)	Date	Version	Comments
Jemima Hubberstey – Research Officer	Author	2024_04_04	V1	Created Policy Document
Laura Tompkins – Research Lead	Author and Reviewer	2024_04_04		Reviewed and amended Policy Document
John Davis – Programme Director of MA in Heritage Studies; Rebecca Wallace – Registrar; Vanessa Hodge – Head of Records; Kathryn Hallett – Head of Conservation and Collection Care; Laura Hutchinson – Head of Media & PR; Constantina Vlachou- Mogire – Heritage Science Manager; Jen Stone – Sustainability Programme	Reviewers	2024_05_15	V2	Reviewed, suggested further policies to include

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		



HISTORIC ROYAL PALACES

Manager; Richard Fitch – Historic Kitchens Manager; Jamie Ingram – Postdoctoral Research Associate				
Research Strategy Board	Reviewer & Approvers	2024_06_24		
Jemima Hubberstey – Research Officer Laura Tompkins – Research Lead	Author Author & Reviewer	2024_08_24	V3	Made amends based on RSB recommendatio ns to include AI, and divided into separate 'Research Ethics' and 'Good Conduct in Research' documents. Added an additional section on sensitive histories.
Research Strategy Board	Reviewer & Approvers	2024_10_03		
Chris Lazenby – Head of HR, Adam Bourn – HR Manager, Jacki Gray – HR Manager	Reviewers	2025_01_17		Made suggestions around further defining researchers and who is governed by HRP policies
Trustees	Reviewer & Approver	2025_02_04		Approved

HRP Policy for Research Ethics			
Policy Owner	Director of Palaces and Collections	Most Recent Approval Date	February 2025
Policy Author	Research Lead	Policy Revision Due	February 2027
Policy Creation Date	October 2024		