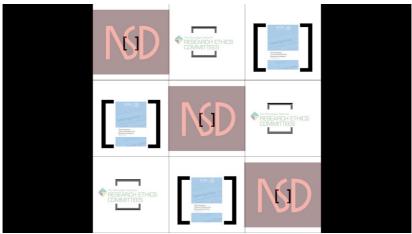


The present flyer discusses how the transposition of the European Code of Conduct for Research Integrity and the Norwegian national framework of research ethics, unto a local arena of the Oslo National Academy of the Arts (KHiO), are lined up up with the legal framework of data protection (NSD).

The present initiative is an invitation to discuss the impact of integrating normative areas of mutual relevance—but with each their provenance and design—at the level of the *readers* in the target group to which the KHiO-code is addressed. The code was approved by the Board June 15th 2021.

KHiO's research integrity code was presented to the professional staff at the Design dpt. on December 1st 2021. Here the presentation of the NSD regulations was singled out. The question discussed here is whether the triangulation of the 3 areas *above* should be declared/dictated, or allowed to grow.



In conclusion, an attempt is made here to consider Code of conduct for research integrity and good research practices at Oslo National Academy of the Arts as a lineup. The point of departure is that the 18-page document, approved by the board, has been transposed from a 10-page EU document.

The question is how the authors of this transposition—ending up in the Code—have moved with the subject as they have elaborated contents designated for the professional staff at Oslo National Academy of the Arts (KHiO): the main problem appears to be that the integrity of the document itself is ailing.

At the difference with the EU-document—which written in a language that assumes of its own independent premises—the KHiO-code is written such that the contents are: a) explained by the *authoring* instance; b) assumed to be *self-regulating*. The pedagogical tone and injunction obstructs the content.

It obstructs the *autonomy* of the reader in relating to a content that stands on its own sets of premises. Which may thwart the intended purpose of the document to reach out to the readers as citizens/œcumene. The document thereby comes through as an *exception* to its *own* rule. A troubling outcome.

The trouble derives from the dual purpose of stating the point and errand of the document's content, and the intention of managing and organising its implementation. The EU document doesn't proceed in this way. Perhaps on account of its extant experience in involving civil society in comitology.

While the EU can make this assumption, KHiO cannot: in the latter case, the authors of the code do not have the implementing power, which—in the EU—is the basis for involving interested parties in civil society in participatory processes of governance; hence the *dictation* which the Code adds to the topic.

Hence the document potentially reveals the malfunctioning of the KHiOorganisation, which is currently under review on a different track (cf, the recent survey conducted at KHiO by <u>Agenda Kaupang</u>). The dual purpose of the document features in its *stating* the need for training among researchers.

Arguably, statements of this sort should *not* be included into documents of the present kind, because it involves the administration in an implementing capacity which should exist in actual practice, rather than on paper. Unless dictation of the implementation is—in reality—is part of the Code's *design*.

If such a design exists, it is *not* likely to be acknowledged. Which is not to be expected either, since denial is readily prompted when interest-differences are accused. The Code is not an invitation for the entire organisation to think —on the topic of integrity—but only *peered* employees with research time.

The greater detail of the Code-document is likely to derive from its seeking to merge the EU integrity document with the Norwegian research ethics guidelines. Furthermore, it also seeks to merge with the NSD data protection guidelines. Which means that it basically seeks to integrate a *legal provision* with the ethics research integrity and knowledge management. A cause for trouble? Maybe. If it is not helping to mature KHiO's professional culture.