



## Ethics Code

This Code applies to all students, staff, independent members of Council and its Committees and all external parties acting on behalf of City.

All of the above have an individual responsibility (and in the case of external parties often a corporate responsibility) to uphold the following principles, which have been approved by the Council and Senate:

1. Raise concerns relating to ethical matters when they arise.
2. Be honest, truthful and act with integrity.
3. Declare interests and eliminate possible or perceived conflicts.
4. Seek to make decisions transparently, consistently and fairly.
5. Maintain professional standards in engaging with other parties.
6. Do not compromise City's values and academic standards when dealing with gifts, donations, grants, contracts and awards.
7. Neither offer, solicit nor accept bribes.
8. Adhere to City's research code of ethics.

The Ethics Code sets out general expectations and guidance on behaviour which may be relevant in disciplinary cases. However, any disciplinary action will be taken under the relevant College procedures, policies or regulations.

The [Governance Team](#) are available to assist in resolving any issues or questions in relation to this code.

## **Guidelines**

It is impossible to devise a single set of rules to resolve every ethical dilemma which individuals covered by this Code may face. Instead, the Ethics Code and the following guidelines should help. The guidelines provide further information on how each principle should apply in practice, and list some of the policies and procedures by which individual issues are presently addressed.

### **Decision making step-by-step**

The following steps may help identify and resolve the ethical implications of individual decisions and actions:

- Consider whether what you plan to do is compatible with the Ethics Code. Further guidance is often available from existing policies, including those listed in this document.
- The following test questions may help determine the right course of action. Ask yourself how you would explain your actions if you had to justify them to close friends and family, or if they were on the front page of a newspaper. What would be the impact on your reputation, or that of the College? How would you feel about asking someone else to do what you are proposing to do? Are your proposed actions justifiable in the context of academic freedom?
- Seek advice from an appropriate person, such as a colleague, line manager, a member of the Senior Leadership Team, Director of Internal Audit or College Secretary. The Research Ethics Committee is tasked with approving any research involving human participants or identifiable personal data and the Committee Secretary and Chair can provide support.

Every individual is responsible for upholding the Ethics Code but those in leadership positions have a particular responsibility to set an example in their conduct and to promote and support good ethical behaviour.

The College will encourage a culture of ethical behaviour as the best way to ensure the highest ethical standards and to safeguard against inappropriate risk.

## **Guidance on the Ethics Code Principles**

City conducts itself in accordance with accepted standards of behaviour in public life.

### **1. Raise concerns relating to ethical matters when they arise.**

You have a responsibility to refer ethical concerns to the appropriate person or body. Individuals with concerns relating to ethical matters that cannot be addressed under an existing policy or procedure should use the [Whistleblowing Policy](#).

### **2. Be honest, truthful and act with integrity.**

You should behave honestly. You should communicate truthfully with each other and with outside parties. No-one should misrepresent their position as a representative of the College, for example with regard to their capacity to influence admission or progression decisions, their role in accepting grants, contracts and donations, or their authority to make public statements on City's behalf. Students and staff should be aware of what is plagiarism and ensure that they do not plagiarise. This includes not paying third parties to produce work which is then presented as if it is their own. A non-exhaustive list of types of academic misconduct is provided in the Assessment and Feedback Policy. Other misconduct is dealt with in the Student Discipline Policy.

### **3. Declare interests and eliminate possible or perceived conflicts.**

Anyone covered by this Code should declare outside interests relevant to their activities at the College, and should take steps to eliminate any potential conflicts that may arise. No-one should be involved in making decisions from which they, or anyone with whom they have a close financial or personal relationship, stand to benefit. This applies to all areas where such conflicts may arise, including student admissions, assessment and progression, disciplinary proceedings, appeals, staff recruitment, staff promotion and remuneration, research, commercialisation of intellectual property, procurement, and assessing proposed relationships between the College and outside parties.

A guiding rule is not just whether there is a potential conflict seen from inside the College, but whether there might be a public perception of a potential conflict. Public perception is an additional critical test of disclosure.

Staff should comply with the the ***Professional Personal Relationships Policy***.

### **4. Seek to make decisions transparently, consistently and fairly.**

Members of Council and staff involved in decision-making should seek to work transparently and consistently, applying publicly-available policies and procedures, and recording a clear rationale for individual decisions. Wherever possible a clear audit trail should be maintained.

Transparency is particularly important in student admissions, assessment and progression, staff recruitment, promotion and remuneration, and procurement, but the responsibility applies across all City activities.

The commitment to transparency should be applied in conjunction with the Data Protection Act and Freedom of Information Act responsibilities, which protect personal and commercially sensitive information.

### **5. Maintain professional standards in engaging with other parties.**

The Council, Senate and the Executive should maintain transparent systems for the approval of new institutional relationships with outside parties, and those processes by which the appropriateness of existing institutional relationships can be monitored. Institutional relationships include academic partnerships, commercial contracts and procurement arrangements, financial grants and donations, and sponsorship agreements. Staff should comply with the College regulations and ordinances covering these contracts and agreements.

Students represent the College and their (intended) Profession when they are placed in external organisations for work experience and should at all times act professionally.

City's institutional relationships should be consistent with the Ethics Code and should be assessed in light of the outside party's objectives in seeking association with the College. Individuals should avoid personal complicity, or the appearance of personal complicity, in conducting themselves in a manner which is inconsistent with City's objectives or the Ethics Code.

In its dealings with states, organisations, and individuals, the College should not enter into any relationship that compromises, or could reasonably be perceived to compromise, its values, or that makes it complicit in illegal activity or the suppression of human rights. This standard should be applied transparently, with wide and appropriate consultation throughout the College, drawing on internal and external independent expertise.

City's Investments are dealt in accordance with the [Investment Policy](#) approved by Council.

Staff should be aware of their responsibilities under the [Anti-Money Laundering Policy](#) and the [Standards and Business Conduct Policy](#).

## **6. Do not compromise City's values or academic standards when dealing with gifts, donations, grants, contracts and awards.**

The following areas are particularly relevant:

### **(i) Gifts, Donations, Contracts and Grants**

Council is under a general obligation to accept donations, gifts and financial grants offered to the College, except where the funds offered derive from illegal activity, where acceptance would be contrary to City's objectives or contrary to the Ethics Code or where acceptance of one grant or donation might jeopardise its ability to raise funds in future. Donations, Gifts, Contracts and Grants should only be accepted if they do not compromise educational, research or enterprise standards or the Ethics Code.

City uses a **Donations Acceptance Risk Assessment Model**, which is part of its [Financial Regulations](#), to determine who should approve the acceptance of donations.

No member of staff should solicit a financial grant or donation to the College, or to any of its departments, research centres, or associated entities, without following City's guidance on the receipt of donations, gifts and grants.

Potential donors, funders, and commercial partners should be made aware that the College will not compromise on its objectives or its Ethics Code. In particular, no constraints should be accepted on intellectual freedom, student admissions, assessment or progression. Impartial, independent research, scholarship and education are the basis for furthering knowledge and the College should not accept donations, gifts, contracts or grants, if this is not clearly understood and accepted by the parties.

City should neither accept significant financial grants or donations from, nor normally form commercial agreements with, registered or graduating students, or individuals closely connected with registered or graduating students. Agreements with organisations closely connected with registered or graduating students need to be considered carefully to ensure that no conflict of interest exists and/or the public would not perceive a conflict of interest in the transaction. Commercial agreements between the College and a student may be approved by the Intellectual Property Commercialisation Board in order to exploit intellectual property.

## **(ii) Scholarships, Prizes, Bursaries and Fee Remissions**

The Executive and staff should ensure that decisions in respect of Scholarships, Prizes, Bursaries and Fee Remissions are made consistently, fairly and in accordance with agreed processes across the College.

## **(iii) Honorary Degrees**

Benefaction is not a satisfactory reason for justifying the award of an honorary degree. Candidates must satisfy the normal criteria of achievement set out in the Ordinances.

## **7. Neither offer, solicit nor accept, bribes.**

Anyone offered a gift in connection with their role at the College should consider before accepting whether it might be intended, or might appear to others to be intended, to influence them to behave improperly. Bribes include money, gifts, or hospitality disproportionate to the relevant circumstances. It is illegal under the Bribery Act 2010 to offer, promise or give a bribe. It is also illegal to request, agree to receive or accept a bribe. More information and guidance gifts and hospitality is available in the [Standards and Business Conduct Policy](#) and the [Travel and Expenses Policy](#).

## **8. Adhere to City's research code of ethics.**

You should comply with the **Research Code of Ethics** available at <https://www.city.ac.uk/research/support/integrity-and-ethics/ethics>

## **Further Information**

[Anti-Money Laundering Policy](#)

[Assessment & Feedback Policy](#)

[Professional Personal Relationships Policy](#)

[Data Protection](#)

[Donations Acceptance Risk Assessment \(Financial Regulations\)](#)

[Investment Policy](#)

[Framework for Good Practice in Research](#)

[Freedom of Information](#)

[Nolan Principles](#)

[Ordinances – J.3 Honorary Awards](#)

[Ordinances – B.3 Power to enter contracts](#)

[Procurement Regulations](#)

[Research Ethics](#)

[Standards and Business Conduct Policy](#)

[Student Discipline Policy](#)

[Travel and Expenses Policy](#)

[Whistleblowing Policy](#)

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