Ethics Action Plan

1. ETHICAL AND SOCIAL RESPONSIBILITY VALUES

The UN Declaration of Human Rights 1948 states "Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace."

Kingston University commits to the highest levels of ethical and social responsibility in all that we do. This includes our core business of teaching and learning, our research and our enterprise activities, our partnerships and collaborations, transactions, financial and otherwise, with all our stakeholders and our supply chain activities. We shall seek to work with individuals, organisations and companies which make a positive contribution to society, so long as value-for-money is demonstrated. We shall engage in regular dialogue with staff and students over issues of ethics.

We will do all that we can to avoid doing business with companies that:
- Fail to uphold basic human rights, as noted in the UN Declaration of Human Rights 1948
- Engage in or condone, the practices of human trafficking, slavery or forced labour in a work environment
- Knowingly provide resources to those who will use them to commit human rights abuses
- Give vocal, economic or diplomatic support to a regime enabling it to commit human rights abuses
- Produce, or invest in the production of armaments or torture equipment used to commit human rights abuses
- Fail to uphold basic labour rights, including the right to form a Union
- Fail to comply with appropriate legislation (The Modern Slavery Act etc)

We will strive to work with companies that make a positive contribution, such as those which within their own company and throughout their supply chain:
- Promote human rights and equality
- Promote international co-operation and an end to international conflict
- Promote good business ethics and good employment practices including (not limited to) complying with the seven Nolan Principles of Public Life
- Protect the global environment, its climate and its biodiversity
- Promote community investment with demonstrable benefits
- Undertake sustainable provision of essential resources and services (utilities, for example)
- Promote Public Health, healthy behaviours and lifestyles
- Promote sustainable development, the sustainable use of resources and the use of renewable resources

In addition, we commit to transparency and regular review and discussion with relevant parties, in order to prevent any direct or indirect association with activities relating to:
- Testing on animals purely for cosmetic purposes
- Slavery and the use of child labour
- Corruption, terrorism, money-laundering, organized crime, human trafficking and any other form of criminal activity at a national, transnational and international level

Business As Usual (BAU) should not override ethical issues so we will always favour value for money alternatives which make a positive contribution.

Our subsidiary companies are required to develop appropriate policies to cover ethical matters, or where they do not have relevant policies of their own, to comply with the University's policies.

2. APPROACH
Ethical Judgements

Ethical considerations apply to every activity in the University. Most ethical judgements result from a process of high quality open debate in which various principles and considerations contribute to the final outcome. Some of these stem from the values of the University as set out in *Led by Learning* and our *Values Statement*. Others originate outside the University: for example some subject communities draw their self-identity in part from the professional ethical codes of their discipline, as disseminated by their professional associations or accrediting bodies. Other aspects are constrained by legislation such as that on disclosure of information, or equality diversity and inclusion or health and safety. Also the ethical standards, values and principles proclaimed, acknowledged or however promoted by relevant international and supranational instruments are kept in high consideration.

We are committed to rational enquiry and debate through which we determine the standards that we apply in judging actions to be acceptable. Ethical consideration attempts to identify good, desirable or acceptable conduct and to provide reasons for these conclusions. Ethical debate will therefore involve discussion of what is right and wrong in particular contexts, and how we make positive or negative evaluations of our own actions and those of others. This is to be approached in the spirit of openness, transparency and collegial discussion.

Charitable Status

The University is a charity and is committed to the principles of rigorous academic investigation and freedom of inquiry in the pursuit of knowledge and understanding. The University acknowledges that the establishment of links between its employees and students and outside bodies, whether commercial, public sector, or other, is not only in the public interest but also conforms with the charitable purposes of the University and the individuals concerned, and the Charities Act 2006.

Each of the University's Governors is a charitable trustee and is subject to the obligations imposed under charity law and has a responsibility for all decisions that might have a significant reputational or financial implication for the University.

Freedom of Speech and Promotion of Academic Freedom

The Education (No. 2) Act 1986 and the Education Reform Act 1988 give universities a legally defined role to secure freedom of speech and promote academic freedom.

We are committed to an inclusive and participatory working and social environment in which we encourage, support and behave appropriately to one another, with respect for differing views. Activities are constrained both by law and the need to ensure openness and respect in relations within our community (see the *Freedom of Speech Policy*).

Within these constraints, the University will support staff and students seeking to publicise the results of research and scholarship which has been carried out as a part of their roles within the University. Staff and students will not associate the University, or its members/or other members of it, in matters which reflect their own opinions on topics that are not the outcome of work carried out as part of their roles in the University (see the *ICT Security and Usage Policies and IP policies*).

Guidance Note
Practicalities: What should you do if you have an ethical query or concern?
Each member of the KU community has a personal responsibility to be aware of and fully understand this document and ensure that our conduct is in line with the Ethics Strategy and sets an exemplary standard of conduct that would be considered best practice within the Higher Education sector. The Ethics Strategy should guide the exercise of judgement in individual cases. Please follow these simple steps to identify and resolve the ethical implications of individual decisions and actions:

- Consider whether what you plan to do is compatible with the values in the Ethics Strategy
- Ask yourself how you would explain your actions if you had to justify them to close friends or family, or if they were on the front page of a newspaper. What would be the impact on your relationships, your reputation, or that of the University? How would you feel about asking someone else to do what you are proposing to do?
- Seek advice from an appropriate person, such as a colleague or line manager
- Take the matter to the appropriate Ethics Committee and present for discussion
- If you need advice on the possible ethical implications of a decision and/or are unclear whether or not you should proceed having taken the steps above, or still have concerns, please refer to the Kingston Institutional Ethics Committee (KIEC) for further advice.

3. ETHICAL BUSINESS CONDUCT
Honest and Transparent Business Operations
It is University policy that all staff, students and agents working on behalf of the University conduct business without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

All staff are required to recognise and declare activities or circumstances that might give rise to conflicts of interest or the perception of conflicts (these declarations are retained on the University's Register of Interests), and to ensure that such conflicts are seen to be properly managed. Discussions should be held with the individual's Line Manager or Supervisor where questions exist.

It is an offence under the Bribery Act 2010 for members of staff, student or University committees to accept, offer or give corruptly any gift or consideration (including disproportionate hospitality) as an inducement or reward. Giving or receiving gifts, entertainment or hospitality in matters connected with University business is acceptable provided they fall within reasonable bounds of value and occurrence and are registered in accordance with the Third Party Gifts and Benefits procedure under the Staff Handbook. All members of the University community must risk assess the vulnerability of their activities to accusations of bribery and corruption, particularly overseas activities, on a continuous basis. Concerns should be raised in accordance with the University's Anti-Bribery Policy.

The University complies with the Modern Slavery Act producing an annual statement and tracking progress each year. It offers training to suppliers and references this and relevant legislation for ethical conduct in procurement exercises.

Relevant policies and guidance:
Anti-Bribery Policy
Third Party Gifts and Benefits procedure (Whistle blowing) Policy
Conflict of Interest Policy
Modern Slavery Act Statement
Contact: Director of VCASD

Compliance with Applicable Laws, Regulations and University Policies
Kingston University operates in a highly regulated environment and is required to comply with a range of legal frameworks and funder requirements which reflect our position as an educational institution, an estate, an employer, a recipient of public and private funds and a charity. Compliance with these requirements is

fundamental to the preservation of our reputation as an ethical institution. Individual post holders are expected to keep updated on and action any changes in legislation in their areas of expertise.

Relevant policies and guidance
Risk Register
Policy Register
Contact: Director of VCASD

A Service Ethos
All University staff are encouraged to share an enthusiasm for providing an excellent service to our stakeholders, partners and customers – this includes our students, fellow colleagues, external partners and local community. It is important to us that we understand the needs of our stakeholders, partners, and customers through meaningful consultation, and that we respond to those needs through the delivery of effective, courteous services which are measured and continuously improved.

Relevant policies and guidance
HR Strategies and Policies
Contact: Director of HR

Information Privacy, Confidentiality and Security
Information is a vital asset to any organisation, and this is especially so in a University which is a knowledge-driven organisation, where information relates to learning and teaching, research and intellectual property arising from research, consultancy, administration and management. The University will ensure that the capture, storage, sharing and destruction of information is handled in a manner that complies with the legal frameworks through appropriate due diligence, policies and training.

Members of staff and students may, by virtue of their positions and responsibilities or programme and project requirements, have access to information that is personal, confidential, sensitive or legally protected. Careful treatment of such information is of the utmost importance and staff and students are required to observe the University policies which relate to the capture, security, maintenance, handling, use and destruction of information

Relevant policies and guidance
Information Security Policy
Acceptable Use Policy - Social Media
Freedom of Information Policy
Data Protection Policy
Intellectual Property Policy
Disposal of Equipment and Confidential Waste Policy
Contact: Director of VCASD

4. **ETHICAL FINANCIAL MANAGEMENT AND PROCUREMENT**
Financial Management
The University's financial management extends to pension fund investments, equities investments, alumni donations and choice of banking providers and lenders. To reduce risk of harm to communities and the global environment, the University will adhere to ethical principles including:

1.   Adopting a positive screening approach to business transactions giving preference to those individuals, organisations and companies whose activities are consistent with the University's values and make a positive contribution to society (as defined above)
2.   Avoiding those companies that violate international conventions and norms in the areas of human rights, employment practices and climate change

3. Not knowingly accepting donations from alumni and alumni companies whose activities are inconsistent with the University's values, and to engage in open and transparent debate where this is in question
4. Encouraging the companies with which we do business to pursue ethical conduct and practices
5. Ensuring risk judgments take into account risks to the University's reputation as well as financial risks
6. Regularly checking alignment with University values
7. Ensuring transparency to relevant stakeholders in University policies and processes
8. Monitoring the operation and effectiveness of ethical conduct on an annual basis

Relevant policies and guidance
Financial Regulations
Treasury Policy
Contact: Director of Finance

Procurement
Expenditure of University funds must be administered with the highest levels of probity and transparency with all parties responsible for securing the best value for money in purchases. To our best endeavours, the University ensures that our chosen suppliers also abide by standards of ethical conduct that satisfy our requirements and are in line with our Procurement Policy and Sustainable Procurement Action Plan which features Whole Life Costing. The Procurement Team undertakes Due Diligence, which includes consideration of reputational and ethical considerations as part of the contracting process. Kingston University intends to support the supply chain to meet and continuously improve delivery of ethical considerations.

Relevant policies and guidance:
Procurement Policy
Sustainable Procurement Action Plan
Academic Registry Due Diligence Forms and Templates
Due Diligence guidelines
Fairtrade Policy
Contact: Director of Finance

5. THE STUDENT EXPERIENCE - ETHICAL TEACHING AND LEARNING
Promoting Equality, Fairness and Ethical Student Behaviour)
Kingston University is committed to fostering an inclusive learning environment that enables students to reach their full potential, and meet the duties of the Equality Act 2010 to treat students, staff and visitors to the University with dignity and respect, not to unlawfully discriminate as set out in the Equality Act, and to promote good campus relations and equal opportunities. Students are expected to behave in an ethical way at all times and to seek advice and guidance where necessary. We will treat all students fairly based on their academic profile alone.
Fair Admissions
All students are accepted on academic merit regardless of religion, race, gender or background, there is uniformity of practice across the University.
Academic Quality
The University is committed to excellent scholarship on the basis of academic integrity, honesty and respect for the intellectual activity of others. Our education is supported by Quality Assurance and the ethical aspects of courses are considered during validation processes. All our partnerships in learning and teaching follow and ethical approach and undergo due diligence checks. Our partnerships are based on mutual benefit which leads to mutual growth and respect.
Progression
Students' academic progression is based on academic achievement. Student scholastic work is expected to demonstrate a level of independent thought and the provision of clear referencing to all sources consulted. The University reserves the right to use all legitimate means at its disposal to detect plagiarism wherever it arises and to take the appropriate action in response to the identification of any misconduct.

Student Feedback and Representation

The University's system for student representation and feedback encourages students to become responsible partners in their education, providing them with opportunities for active involvement in, and ownership of, their learning. Elected Student Representatives from all subject areas, undergraduate and postgraduate, are given responsibility for reporting on student issues within their subject to University staff and the Students' Union. This allows ethical concerns regarding the subject or method of teaching to be raised at an early stage and at the appropriate level. In addition, students are offered a wide range of opportunities to give feedback and report any issues which concern them during the course of their studies.

Teaching and Research Collaboration

Scrutiny and approval of academic collaborations with other universities and organisations ensure that the University's strategic aims are supported. Due diligence is explicitly carried out with regard to legal and human rights compatibility as well as collaboration provision arrangements in order to ensure they are equivalent in quality and standards (student experience as well as academic content) and are compatible with any Quality Assurance Agency (QAA) or other relevant benchmarks.

Complaints

The Student Complaints Procedure sets out a clear timeframe and process flow for the investigation of complaints and communications. It includes provision of mediation and appeals processes which allow ethical concerns to be raised.

Union of Kingston Students/KUL Partnership Agreement

Using the University's Led by Learning strategy and the overarching themes of learning, enquiry and practice; enriching lives; and respect for individuals, communities and our environment as a guide, the Agreement gives a clear idea of what students, the students union and the university should expect from each other. It explains our shared rights and responsibilities, including treating each other with dignity, respect and courtesy.

Relevant policies and guidance

Student Partnership Agreement

Ethics in the Curriculum

Wherever ethical questions and decisions are relevant to a subject's activity, ethics must be an explicit part of the curriculum included in teaching and in course materials.

Ethical choices and issues may arise in relation to the learning, teaching and assessment methods adopted, including students' experiences on placements and in work-based learning contexts. Staff should be alert to any potential for pedagogic practice to treat students, or ask students to treat others, in ways which are unethical.

Ethical issues that may be relevant in teaching programmes include:

- -The ethical design, conduct and dissemination of research as part of a programme of study (covered below).
- -The impact of subject matter on individuals or identifiable groups including but not necessarily limited to those groups directly specified in legislation on equality and diversity.
- -The understanding and analysis of the context and mechanisms of choice between alternative policies or practices.
- -The impact of subject matter on the environment.
- -The impact of the subject matter on creativity, freedom and autonomy.
- -The understanding of historical and cross-cultural differences in ethical consideration and standards.
- overall importance of personal responsibility in own ethical behaviour

In addition, every student should have opportunities for reflection and debate on relevant ethical issues. Teaching programmes should not attempt to impose a particular set of ethical imperatives, but encourage high quality open debate on how ethical issues might be transparently discussed and resolved.

Relevant policies and guidance
Contact: DVC Education, Dean of Teaching and Learning, Dean of Students

6. ETHICAL RESEARCH AND ENTERPRISE ACTIVITY

All research activities, as defined for REF purposes, when involving humans, data on humans or human tissue require ethical review. This is overseen by the University Research Ethics Committee. The significant guiding values in research ethics are respect for all participants and the integrity of the researcher. The University endorses the key principles of rigour, respect and responsibility set out by the Department of Business, Innovation and Skills. Normally, formal review by a faculty committee is only necessary for staff research and research undertaken by students above taught postgraduate level.

Ethical review of undergraduate and taught postgraduate research is normally undertaken by the student's supervisor under the Block Release agreements, following procedures and guidance promulgated by the relevant faculty committee or CHERP .All undergraduate and postgraduate students involved in research projects are required to consider the ethical dimensions of their work and to follow the guidance made available to them relating to research ethics and research integrity. General advice can be obtained from each Faculty.

The CHERP Research Ethics Committee considers research on higher education policy and practice undertaken by staff in Faculties (referred by Faculty RECs) and Directorates, as well as all PG research undertaken as part of CHERP validated programmes. It also makes recommendations on and offers opinion of ethical aspects of investigations relating to data collection and /or research in Higher Education policy and practice applications which do not meet the KUL definition of research but where data is to be collected from human participants within the University. These may be referred from any part of the University to the CHERP committee.

Research ethics training for undergraduate and postgraduate students will include discussions of research integrity and the relevant codes of practice of the University and external bodies. The University will invoke its staff or student disciplinary procedures in relation to alleged breaches of research integrity.

The University embraces the following general principles of responsibility governing research which involves human participants:
- -to respect the rights and interests of participants in the research, and to take account of the consequences for them
- -to respect individuals as autonomous agents with rights regarding decision and choice, and to conduct research on the basis of informed consent
- -to reflect on the broader social and cultural implications of the research
- -to ensure that appropriate additional protection, information and support is provided for individuals with any diminished autonomy (including minors), arranging consent by representatives as necessary
- -to act in accordance with the Mental Capacity Act 2005 when recruiting participants who lack capacity
- -to assess the risks of harm and potential benefits to participants and researchers
- -to respect confidentiality and to ensure the security of personal and sensitive information, adhering to the requirements of the Data Protection Act 1998
- -to embrace the obligation to maximise possible benefits and to avoid or to minimise possible harms resulting from the research.

Many subject areas within the University will have available requirements, guidelines or a code of practice on ethical issues that have been developed by professional bodies or subject associations. Where such external documents are available, the School, Faculty or Directorate may make an explicit resolution to adopt the guidelines or code for the discipline or profession, either in whole or in part, and should communicate this decision, together with a copy of the relevant documents, to the relevant Faculty Committee.

All other research and related knowledge transfer and enterprise activity not subject, as a matter of law or policy, to external ethical review is subject to internal review by the responsible manager and CHERP. It should, however, be noted that review must be proportionate to the risks and burdens associated with the research, knowledge transfer or enterprise activity.

Heads of Department and Deans are responsible for ensuring that local codes, guidelines and procedures are communicated effectively and are supported by appropriate administrative arrangements and documentation.

Research integrity
We adhere to the Universities UK Concordat to support research integrity which includes commitments to: Honesty; Rigour; Transparency and Open communication; Care and respect

All involved in research owe a duty of accountability to society, to the University, to their profession and to funders of the research to pursue research that is designed to contribute to knowledge. All leaders and managers of research projects are responsible for:
- -Managing risks and ensuring the safety of those involved
- -Ensuring the probity of the financial management of the project
- -Responsibility for seeking to provide optimum value for funds invested
- -Ensuring clarity in contractual arrangements including intellectual property and disclosure
- -Effective management of the project including timely provision of tangible outcomes

Where research is conducted by a team, the leader of the team or principal investigator is responsible for ensuring that the project is subject to independent ethical review and all members must sign the 'RE4' application form.

Any member of the University who believes that there may have been a breach of research integrity should refer to the *University Whistle Blowing Policy* Examples of such breaches include:
- Misappropriation of another's intellectual property by plagiarism or breach of confidence
- Theft or damage of another's research-related property
- Misrepresentation of research findings by deception or lying
- Obstruction, including withholding, destroying or falsifying evidence
- Unfairly influencing witnesses or interviewees
- Breach of confidentiality required by external contracts
- Deliberate commercial exploitation of ideas without acknowledgement/informed consent
- Failing to comply with statutory or institutional regulations, including ethical review

Enterprise and Knowledge Transfer, Partnerships and Collaborations
From time to time the University debates general issues on the desirability of working with, receiving funding from or otherwise engaging with external organisations. The University believes that Enterprise and Knowledge Transfer, and the resulting collaborations with partners can be a key determinant of success in research and teaching. We aim to have a positive impact and provide maximum public benefit in accordance with our charitable status. In so doing we aim to underpin our partnerships, collaborations and commercial activities with ethical considerations. Relevant external organisations which undertake to partner and collaborate with the University are expected to abide by the principles of this Strategy.

The University looks to engage with external organisations which display responsible employment practices, adopt sustainable environmental practices and demonstrate excellent corporate governance. Internationally, the University engages with a range of countries and individual corporations with a view to increasing the international impact of its research and teaching. In so doing, we seek to promote research excellence, good governance and the observance of the rule of law. Regionally, the University acts to contribute positively to the social cohesion and sustainability of its local and regional community.

Relevant policies and guidance
Faculty Research Ethics Committees
Contact: UREC Chair

7. FUNDRAISING AND GIFTS

Coordination

All potential donors and donations — regardless of the potential gift amount — should be discussed with the Director of Development and Alumni Relations. The Due Diligence process will trigger on all prospects with an estimated wealth of £10m plus and for asks and gifts in excess of £10,000. Potential reputational risks that result from negative public perception will be considered. Donations of more than £25,000 from unknown donors or where the source cannot be verified should be reported to HEFCE as constituting a serious incident. This should be discussed with the Finance Director and Director of DARE.

Gift Acceptance Committee

The gift acceptance committee will meet on an ad hoc basis by phone or by email to ensure all gifts are made in alignment with the strategic goals of Kingston University.

All donations will be used to support the educational mission of the University

The University is required to comply with general charitable law, and to act within its objects for the advancement of education (which includes matters such as research, knowledge advancement and dissemination, and scholarships).

Transparent and responsible fundraising

All gifts are in accordance with the University's mission and standards. Every effort will be made to respond to donor's requests in terms of the mode, frequency and availability of information from the University. Any donor records maintained by the University are kept confidential. Donors have the right to see their own donor record, and to challenge its accuracy. The University will not sell either its donor or alumni lists.

Management of the gift

Donors accept that the management, and governance of programme and/or activities funded through philanthropy, rests solely with the University

Donations by the University

The University may only make donations that further its charitable purposes. The Finance Director and Head of Legal Services must approve any gift, and will report any approved gifts to the Audit Committee on an annual basis.

Relevant policies and guidance
Gift Acceptance and Ethics Policy
Due Diligence guidelines
Contact: Director of Development & Alumni Relations

Approved by Senior Management Team July 2016