

Kingston University is committed to the highest standards of ethical conduct in activities conducted at, by, or in the name of the University anywhere in the world. We aim to support our students, staff, partners, visitors, supply chain and local and global community to act ethically to positively shape society, culture and industry. The University recognises the social, environmental, long-term and global impacts of its activities and continuously seeks to improve the positive impacts whilst avoiding harm. Kingston University intends that all our actions and involvements contribute to a peaceful, healthy and just society, living within environmental limits.

Charitable Status

The University is a charity that 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 2011. 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.

Nolan Principles

It is the University's expectation that every member of the University community should act in accordance with the Nolan Principles of Public Life: *Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership* and embed ethical conduct in all activities.

Definition of Ethical Conduct

Our definition of ethical conduct is based on the protection of: global human rights in the UN Convention 1948; equality and labour rights; the safeguarding of our global environment, climate and biodiversity. We aspire that all our actions support the sustainable provision of essential resources and services, community investment, international co-operation and peace.

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."

The University will not do 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 trade union;
- Fail to comply with appropriate legislation including the Modern Slavery Act 2015.

The University will 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;
- 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, regular review and discussion with relevant parties, in order to prevent any direct or indirect association with activities relating to:

- Corruption, terrorism, money-laundering;
- Testing on animals purely for cosmetic purposes;
- Investment in fossil fuels; tobacco; pornography or gambling.

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

Ethics in business activities

Ethical conduct is embedded in all of our areas of business as summarised below:

- **Research, Business and Innovation** – we undertake our research and consultancy following ethical guidelines and are transparent about from whom we accept funding and with whom we collaborate;
- **Learning and Teaching** – we seek to offer courses that engage with ethical issues and teach in a manner that aligns with our ethical commitment, we recruit, assess and handle complaints fairly and transparently;
- **Business and Financial operations** – we behave ethically in how we run our institution, including our relationships with suppliers and external parties;
- **Our People** – we ensure a respectful and inclusive culture for all which reflects our ethical values;
- **The Environment** – we aim to measure, monitor and reduce our environmental impact whilst focusing our efforts on our positive impacts for current and future generations.

Ethics in 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, benefactors and 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

This Ethics Statement is delivered by specific policies and guidance in these areas of business and the detailed consideration of ethical cases rests with the existing University committees which adopt a level of scrutiny proportionate to the risk of harm or adverse effect to individuals, the University and to society as a whole.

Institutional Review – University Ethics Panel

Institutional review of the Ethics Policy is undertaken regularly to ensure a rigorous and independent process of ethical review proportionate to the risk involved via:

- a common framework for consistent professional practice, communications, training, guidance and support and decision-making processes;
- the transparent discussion of complex and potentially entrenched and controversial global ethical issues;
- the identification of opportunities for continuous improvement on ethical issues;
- annual assurance to Board of Governors.

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, others originate outside the University from professional ethical codes of a discipline, professional association or accrediting body. Other aspects are constrained by legislation or guided by international and supranational instruments.

The University is committed to rational enquiry and debate. 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.

What should you do if you have an ethical query or concern?

Each individual member of the Kingston University community has a personal responsibility to be aware of and fully understand this document and ensure that conduct is in line with the ethics statement and sets an exemplary standard of conduct that would be considered best practice. The ethics statement 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 statement;
- Ask yourself how you would explain your actions if you had to justify them to close friends or family, or if they were subject to public scrutiny. 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 on the possible ethical implications of a decision from your line manager;
- Take the matter to the appropriate Ethics Panel, and present for discussion;
- Having taken the steps above, and if you still have concerns, please escalate to the Vice-Chancellor or his nominated deputy;
- Always keep a written record of your decision-making and the rationale for it.

Vice-Chancellor Prof Steven Spier (June 2021)