

Corporate Ethics Policy

V.2 – 26 September 2023

1. PURPOSE

- 1.1 UWE Bristol aims to promote and achieve the highest ethical standards. The corporate ethics policy articulates the general principles that will guide all members of the University in meeting these standards and provides guidance on ethical dilemmas.

2. POLICY STATEMENT ON ETHICS

- 2.1 UWE Bristol encourages the pursuit of knowledge in an open community, promoting and valuing freedom of speech, critical engagement and a respect for diverse opinions.
- 2.2 UWE Bristol is committed to sustainable development, health and wellbeing, and the highest standards of corporate governance.
- 2.3 UWE is an inclusive community which welcomes staff, students and external users from diverse cultures and social backgrounds. We must ensure people are treated fairly regardless of age, disability, race, nationality, ethnicity, sex, gender/gender reassignment, religion or sexual orientation. We must provide the appropriate resources, teaching methods and assessment, to enable all users to benefit from and participate fully in the life of the University.
- 2.4 UWE Bristol expects its staff, students, governors and external partners to undertake University activities in a way which embraces the above and realises the University's values:
 - Ambitious – We are not afraid to shape, challenge and tackle the big issues, to take the initiative and pave the way.
 - Collaborative – We have strong connections locally and globally. We help people and organisations be the best they can, building trust throughout our university community and beyond.
 - Inclusive – We make UWE Bristol a supportive and inspiring place to learn and work – somewhere where diversity of experience and perspective is encouraged, and learning and research is shared and accessible.
 - Innovative – We create new opportunities for the people who work and study with us. We embrace different ideas and pioneer new and

- sustainable ways of doing things.
 - Enterprising – We instil a thirst for new knowledge, its creation and application, empowering our students and staff to demonstrate a creative questioning approach, a 'can-do' confidence, and ability to navigate uncertainty.
- 2.5 Furthermore, the University is committed to ensuring that all its activities are conducted in accordance with relevant international, national and regional, laws, regulations, and best practice. Activities must also serve to substantiate the Nolan Principles set out in 1995 by the Committee on Standards in Public Life: selflessness; integrity; objectivity; accountability; openness; honesty; and leadership.
- 2.6 In undertaking activities on behalf of the University, university staff and governors are expected to promote and support the University's values and the above principles, through leadership and example setting. In developing and implementing the University's activities, staff, students and governors should be guided by several key questions: Is the action legal? Will I and UWE be proud of the action? Does the action comply with the University's values? Can I confidently and credibly defend the action to my immediate peer group and in the professional spaces within which I operate? Staff, students and governors must ensure that they can answer 'yes' to these crucial above questions; if they cannot be certain, Colleges and Professional Services must have an identified nominee who can be turned to for advice.

3. UNIVERSITY ACTIVITIES

- 3.1 Ethical issues arise across all spheres of University activity; from learning, teaching, and research, to knowledge exchange, community and public engagement, and relations with sponsors and donors. The above principles must inform the University's staff, students, governors and external partners as they undertake all University activities, inclusive of, but not restricted to the activities below, for example:
- 3.2 In **learning, teaching and the student experience** the University will:
- Exercise a general duty of care to all students as adults in a university environment, ensuring transparency, equity and good customer service prior to their arrival, throughout their time at the University and beyond, in accordance with the University's policies.
 - Expect high academic standards, valuing integrity and thoroughness, and rejecting plagiarism in the work of UWE Bristol students.
 - Support involvement in the Students' Union and encourage students and Students' Union representatives to enter into dialogue about the University's ethical stance, policies and procedures.

3.3 In **research** activities:

- Staff and students will further knowledge in an ethical, responsible and rigorous manner, demonstrating the highest standards of integrity, critical awareness, the rejection of plagiarism and the rejection of falsified data or results.
- Staff and students will protect the safety, rights, dignity, wellbeing, confidentiality and anonymity (except where covered by an appropriate protocol) of research participants, the welfare of animals, the community, and the sustainability of the environment; as is within the scope of the Handbook of Research Ethics.
- Each College will make sure appropriate UWE ethical guidelines and procedures are followed for research undertaken under its auspices, to ensure the highest standards of ethical behaviour in relation to research activities.

3.4 In its **knowledge exchange, consultancy, and external partnerships** with the community, employers, suppliers and other educational providers, international, national, and regional, the University and its staff and students will:

- Look to engage with external organisations (regionally, nationally and internationally) which display responsible employment practices, adopt sustainable environmental practices and demonstrate excellent corporate governance and the observance of the rule of law.
- Develop relationships characterised by honesty, fairness, mutual trust, and academic integrity; demonstrating transparency in relation to conflicts of interest with individuals, Colleges and the University, and a repudiation of any improper bias.
- Seek to deliver a prompt quality service that offers value for money and good customer service, maintaining high professional standards at all times. Consultancy and advice will only be offered within the consultant's area of knowledge and field of expertise.
- Ensure ethical considerations form an integral part of the University's financial affairs, procurement and acceptance of donations, following the principles set out in UWE's Responsible Procurement ESG Policy, Ethical Investment Policy and ethics guidance on fundraising respectively. The University must look to maximise both the public benefit of its activities and its financial performance and achieve an appropriate balance.

3.5 In the staff experience the University will:

- As an employer, exercise a duty of care to staff, ensuring transparency and equity in its engagement, putting in place appropriate structures to ensure staff development and equality of opportunity.
- Create a working environment that minimises harmful stress, is conducive to healthy living and working, is free from unlawful

discrimination, and which supports the University's People Strategy.

- Defend the right of all staff to teach and discuss challenging and urgent issues, within the constraints of the law. All staff must however be mindful of the ethical issues arising from the discussion of such topics. As set out in the UWE Bristol's Freedom of Speech Policy, the University expects all persons taking part in its activities to be tolerant of the diverse identities of others, in line with the University's core value of inclusivity, being sensitive to the diversity of its community and all sections of that community. While debate and discussion may be robust and challenging, all speakers have a right to be heard when exercising their right to free speech within the law.
- Require staff to avoid initiating or developing a close personal relationship with a student. However, in the event that a close personal relationship already exists or develops, the member of staff should declare the relationship where this might present a conflict of interest.

- 3.6 UWE recognises and accepts that it has an obligation to all those with whom it has dealings with to observe and meet the standards outlined in the ethics policy. Governors and staff must make themselves fully aware of, and adhere to, this policy and the relevant codes of conduct with which it is associated. This applies to all University activities, wherever, whenever, and however they are conducted. Commitment to this ethics policy is fundamental to the University's reputation and long-term success.

4. COMPLIANCE WITH THE POLICY

- 4.1 Our commitment to this Ethics policy is fundamental to our reputation and long-term success.
- 4.2 Adherence to this Policy is a condition of employment and of student registration. This is supported through staff development and training, and accountability regarding performance. Failure to comply with the Policy may lead to disciplinary action, including dismissal of staff or expulsion of students. Staff and students have an obligation to report actual or potential infringements of the Policy. Intimidation and bullying, including retaliation or retribution for reporting genuine concerns, violate the University's ethical principles and will not be tolerated.
- 4.3 Alleged breaches of the Policy may be dealt with by appropriate bodies specified under specific strategies, policies, procedures, guidelines or codes of practice. If they cannot be addressed under any specific procedure, they must be considered by a Panel of the University Ethics and Integrity Committee and referred to the appropriate authority inside or outside the University. No part of this Policy may be waived or suspended.

- 4.4 We may terminate our relationship with other individuals, partners and organisations working on our behalf if they breach this policy.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

- 5.1 Raising awareness of ethical considerations is a priority within the University. The University's Ethics and Integrity Committee will consider a number of ethical issues throughout each academic cycle. A priority for the Committee is to engage the wider university community in these matters, demonstrating a confidence across the University is discussing contentious issues and pushing the boundaries of knowledge and understanding.

ANNEX A - Current UWE policies and guidelines which contribute to an overall ethics policy framework

UWE Policies can be found via the following link unless otherwise stated:

<https://www.uwe.ac.uk/about/structure-and-governance/policies>

UWE Strategies can be found via the following link unless otherwise stated:

<https://www.uwe.ac.uk/about/values-vision-strategy/strategy-2030/strategy-documents>

UWE Bristol Strategy 2030 - <https://www.uwe.ac.uk/about/values-vision-strategy/strategy-2030>

Governance and Management

- Board of Governors Code of Conduct (internal document)
- Data Protection
- Freedom of Information - <https://www.uwe.ac.uk/about/contact-us/freedom-of-information>
- Freedom of Speech
- Modern Slavery and Human Trafficking Policy
- Risk Management Policy and Procedure
- Whistleblowing and Public Interest Disclosure
- Consumer rights (PDF)
- Student Protection Plan (PDF)
- Student Protection Plan - compensation and refund policy (PDF)

Applications and admissions

- Admissions Policy
- Contextual Admissions Policy
- Procedure for withdraw, reject or defer application under section 10.0 of the UWE Admissions Policy
- Applicant Conduct Procedure
- Criminal Conviction Policy
- Criminal Conviction Procedure

Diversity, Inclusion and Wellbeing

- Transforming Futures Equality, Diversity and Inclusivity Strategy
- Transforming Futures Health and Wellbeing Strategy
- Equality, Diversity and Inclusivity Policy and supporting policies
- Access and Participation Plan
- Disability Service - <https://www.uwe.ac.uk/life/health-and-wellbeing/get-disability-support/about-our-disability-services>
- Health and Wellbeing Services - <https://www.uwe.ac.uk/life/health-and-wellbeing>
- Hate incident reporting - <https://www.uwe.ac.uk/about/values-vision-strategy/equality-diversity-and-inclusivity/hate-incident-reporting>

Environment and Sustainability

- Transforming Futures Climate Action and Sustainability Strategy
- Environmental Sustainability Policy 2022-2025 - <https://www.uwe.ac.uk/-/media/uwe/documents/about/sustainability/environmental-sustainability-policy-2020-2025.pdf>
- Community Liaison Services - <https://www.uwe.ac.uk/about/services/community-liaison>

Finance

- Anti-Bribery Policy
- Responsible Procurement ESG Policy
- Ethical Investment Policy - <https://www.uwe.ac.uk/-/media/uwe/documents/about/sustainability/ethical-investment-policy.pdf>
- Financial Regulations - <https://intranet.uwe.ac.uk/tasks-guides/Policy/financial-regulations> (internal document)
- Tuition Fee Policy

People and Staff and Student Conduct

- Transforming Futures People Strategy
- Acceptable Use Policy for Users of IT Facilities
- Bullying and harassment of or by students (PDF)
- Complaints Policy and Procedures
- Health and Safety Policy
- HR Policy and Procedures
- Information Handling Policy
- Information Security Policy

- Library Services User Information - <https://www.uwe.ac.uk/study/library>
- MYUWE and Blackboard terms and conditions
- Safeguarding Policy and Procedure
- Suicide Prevention and Response Strategy
- Student Conduct Policy
- Professional Suitability Policy and Procedure (PDF)
- Sexual and domestic violence, abuse and harassment statement from UWE Bristol and The Students' Union at UWE (PDF)
- Student Behaviour and Health policy framework (PDF)
- Student Drugs including Alcohol Policy (PDF)
- Student Pregnancy, Maternity and Adoption and Partner Policy (PDF)

Research, Knowledge Exchange and Consultancy

- Transforming Futures Research Strategy
- Transforming Futures Community and Business Engagement Strategy
- Code of Good Research Conduct
- Policy Statement on the Use of Animals in Research - <https://www.uwe.ac.uk/research/policies-and-standards/animals-in-research-statement>
- Research Data Management Policy
- Research Misconduct Procedure - <https://www.uwe.ac.uk/-/media/uwe/documents/research/uwe-research-misconduct-procedure.pdf>
- UWE Bristol Handbook of Research Ethics - <https://www.uwe.ac.uk/-/media/uwe/documents/research/uwe-bristol-handbook-of-research-ethics.pdf>
- Intellectual Property Policy and Regulations

Teaching

- Transforming Futures Teaching and Learning Strategy
- Academic Appeals Policy
- Academic Regulations and Procedures
- Assessment Content Limit Policy
- Assessment and Feedback Policy
- Assessment Offences Policy
- Audio-Video Recording for Educational Activities and Audio Policy (additional information)
- Certificate and Transcript Policy
- Degree Outcomes Statement
- Reasonable Adjustments Disabled Students Policy
- Work Based Learning

ANNEX B – University Ethics and Integrity Committee Terms of Reference

Purpose

The University Ethics and Integrity Committee (UEIC) is a sub-committee of Academic Board. It oversees the University's approach to academic integrity, corporate ethics and due diligence, and considers and makes recommendations on significant ethical matters for the University. Ethical considerations include academic activity, particularly research, knowledge exchange and academic partnerships, and also corporate ethics matters such as donations and business engagements as referred to the Committee. The Committee is responsible for promoting and championing ethical practices and standards across the University.

The University Ethics and Integrity Committee has the authority to steer the work of Colleges, Academic Schools and Professional Service areas of the University, in relation to its areas of responsibility. The Committee will consider key themes, complex individual research ethics cases where referred from College or School Ethics Committees/Panels, and matters as referred by Colleges, Schools and the wider university, in line with the University's integrity policies and procedures.

In fulfilling its purpose, the University Ethics and Integrity Committee will work closely with the Learning, Teaching and Student Experience Committee and the Research and Knowledge Exchange Committee, and may call upon the support of its sub-committees:

- Animal Welfare & Ethics Sub-Committee.
- Human Tissue Sub-Committee.

The Committee may also call upon internal and external advice, for example in relation to Genetic Modification, biological safety, radiation, data protection and other related areas.

The College or School Ethics Committees/Panels will fulfil the research ethics consideration and approval process locally and report to the College Dean of Research and Enterprise, with exception reporting to be provided to the Committee. It is not expected that the College or School Ethics Committees/Panels will hold regular formal meetings, but instead that they adopt agile ways of working to manage their workflow.

The Chair of UEIC will meet at least annually with College or School Ethics Committees/Panels to review key themes, best practice and developments regarding university policy, practice and guidance in this area. The Chair will also have ongoing engagement with the Chairs of College or School Ethics Committees/Panels with regards to the specific policy, procedural or training needs of the College or School.

Membership

- Chair – nominated by the Vice-Chancellor and independent from university executive structures.
- Deputy Chair – nominated and approved by the Chair in consultation with the Committee, from existing Members.
- College Deans of Research and Enterprise (representing College or School Ethics Committees/Panels within their College and providing assurance on their effectiveness, these roles will also be trained as scrutineers).
- Head of the Doctoral Academy (or nominee).
- Chair of the Animal Welfare & Ethics Sub-Committee.

- Chair of the Human Tissue Sub-Committee.
- Students' Union elected representative, on the nomination of the Students' Union President.
- An independent member of the Board of Governors.
- Chief People Officer (or nominee).
- Director Research, Business and Innovation (or nominee).
- Director of Student & Academic Services (or nominee).
- Finance Director (or nominee).
- General Counsel.
- Head of Risk, Resilience and Assurance.
- Research Governance Manager.
- Independent external member from the health sector – nominated by the Vice-Chancellor and approved by the Chair.
- Independent external member from the business sector – nominated by the Vice-Chancellor and approved by the Chair.

18 Members.

In attendance

Chief of Staff and Clerk to the Board of Governors / Director of Strategy and Governance (Secretary).
Committee Officer.

Members "in attendance" do not have voting rights. The Chair has the discretion to invite additional officers to a set meeting of the Committee in a non-voting capacity to provide specialist advice as required, for example in relation to corporate communications or data protection. In addition, members of the University's research community will be drawn upon where their academic expertise in a particular area is required by the Committee or to support the exception reporting from the College or School Ethics Committees/Panels.

The membership can include up to two co-opted members with voting rights. Co-opted members are appointed by the Chair in consultation with the Committee.

Responsibility

The University Ethics and Integrity Committee is responsible for:

1. Considering, robustly debating, and establishing a university-wide approach for significant current and future ethical matters impacting on the business of the University.
2. Maintaining oversight of the ethical framework for the University's decision making, assuring itself that decisions are being taken across the University in line with this framework, including around partnerships and international work.
3. Overseeing and gaining assurance on the University's framework for due diligence and the consideration of conflicts of interest, providing advice to the Vice-Chancellor on the most complex cases.
4. Approving, with advice from the University's Executive, the approach to research ethics review in the Colleges and Schools, monitoring and providing assurance that human and animal participants, and the environment, are afforded appropriate ethical protection in relation to research conducted by staff and students of the University.

5. Overseeing the work of the Animal Welfare and Ethics sub-Committee, and the Human Tissue sub-Committee, providing assurance on legal compliance and fulfilment of their terms of reference.
6. Advising on individual research ethics applications, where:
 - a. It is not appropriate for the application to be considered by a College or School Ethics Committee/Panel.
 - b. The applicant does not have a home School, or where an external application cannot be reasonably reviewed by a College or School Ethics Committee/Panel.
 - c. The Chair of the College or School Ethics Committee/Panel refers the application to UEIC for additional advice.
7. Advising on ethics and integrity issues raised by Colleges, Schools or Professional Services, in line with the University's policies and procedures.
8. Providing advice on ethical matters to inform Vice-Chancellor, Vice-Chancellor's Executive and/or the Board of Governors' decisions on specific issues that might pose significant ethical and/or reputational risk to the University.
9. Considering any ethical matters that might be submitted for review by the Board of Governors, Vice-Chancellor's Executive, or Academic Board, convening an emergency meeting or review via Teams, of the whole or part of the Committee, as appropriate, to consider the issues where required.
10. Working with Schools, Colleges and the Vice-Chancellor's Executive, to create an environment in which ethics and integrity are embedded into all areas of the University's work, leading on the training, development, and understanding of emergent issues to facilitate this.
11. Seeking clarification from external expert bodies on matters of ethics and integrity policy and practice.
12. Advising on and assuring compliance with external regulations, funding requirements and/or guidance on the integrity and ethical conduct of research, in particular the Concordat to Support Research Integrity.
13. Developing and reviewing policy, procedures and guidelines for corporate ethics, integrity and the ethical conduct of research, research misconduct, due diligence and supporting the spreading of good practice across the University.
14. Overseeing a programme of audit of the ethical conduct of research conducted by staff and student researchers.
15. Ensuring active consideration of equality, diversity, and inclusion in the conduct of its business.
16. Evaluating annually its performance and that of any Sub-Committees, Panels or groups it creates to ensure academic governance arrangements enhance institutional performance and add value.

Accountability

The University Ethics and Integrity Committee is accountable to Academic Board. It reports to it on:

- Approval of new policies and frameworks within its area of competence.
- Proposals for changes to its Terms of Reference, membership, or priorities.
- Any matters or priority areas referred to it for action by the Chair of Academic Board or Vice-Chancellor's Executive.

The Committee also reports to the Board of Governors on any matters related to corporate ethics or matters that are referred to it by the Board.

The University Ethics and Integrity Committee provides an annual assurance report to Academic Board, through which it demonstrates how it has fulfilled its Terms of Reference and assessed its own effectiveness. The requirements for the report are specified by Academic Board, which may then make recommendations to amend its Terms of Reference and/or membership accordingly.

Administration

UEIC will normally meet five times a year. Meetings will be scheduled to enable UEIC to fulfil its accountabilities to Academic Board, supporting timely updates on progress and new developments. The duration of meetings will be approximately 2.5 hours.

The Quorum for meetings is one-third of members eligible to attend.

Representative members who are nominated to represent a particular constituency will be reviewed and confirmed annually. Co-opted members will serve a maximum three-year term.

A committee officer will be identified to support the Chair in the effective and efficient conduct of the Committee's business.

An emergency meeting, or review of an urgent matter via Teams, can be initiated by the Chair working with the Clerk. The approach taken will be noted, and where appropriate considered, by the Committee at its next meeting.

The Terms of Reference for UEIC will be reviewed annually to ensure they are still relevant and effective and that UEIC can effectively discharge its duties. As part of the review consideration should be given to how the Committee can improve and better integrate practices which support equality, diversity and inclusivity.

ANNEX C: The Seven Principles of Public Life

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

These principles apply to all aspects of public life. The Committee has set them out here for the benefit of all who serve the public in any way.

For further information go to <http://www.public-standards.gov.uk/>

Document Control Box	
Policy Title	Corporate Ethics Policy
Date Approved	26 September 2023
Approving Body	University Ethics and Integrity Committee; Board of Governors (substantive changes)
Version	2.0
Supersedes	Corporate Ethics Policy 2016
Previous Review Dates	n/a
Equality Impact Outcome	n/a
Next Review Date	Every three years – October 2026, unless there are internal or legislative changes that necessitate earlier review.
Related Statutes, Ordinances, General Regulations	
Related Policies / Procedures	See Annex A
Related Guidance and / or Codes of Practice	Institute of Business Ethics and The Council for Industry and Higher Education ' <i>Managing Ethical Issues in Higher Education</i> '.
Related Information	
Policy Owner	Jodie Anstee, Chief of Staff and Clerk to the Board of Governors
Lead Contact	Jodie Anstee, Chief of Staff and Clerk to the Board of Governors