

ETHICS POLICY

Approved by	Audit Committee and the Board of Governors		
Date approved	5 October 2017	Status	Final
Policy owner	Director of Planning & Policy Development	Impact assessed	Yes
Version	2	Date of next review	August 2020

1. Policy Statement

- 1.1 The Robert Gordon University embraces and endorses the highest principles in regard to ethics. This policy has been developed to ensure that all business, research, teaching and administration carried out in the name of the Robert Gordon University is performed to the highest ethical standards.

2. Standards

- 2.1 The Robert Gordon University embraces the values and high professional standards enshrined in the Nine Principles of Public Life in Scotland and these should be upheld by all employees of the university at all times.
1. **Duty** – You have a duty to uphold the law and act in accordance with the law and the trust placed in you. You have a duty to act in the interests of the body of which you are a member and in accordance with the core functions and duties of that body.
 2. **Selflessness** – You have a duty to take decisions solely in terms of interest of the institution. You must not act in order to gain financial or other material benefit for yourself, family or friends.
 3. **Integrity** – You must not place yourself under any financial, or other, obligation to any individual or organisation that might reasonably be thought to influence you in the performance of your duties.
 4. **Objectivity** – You must make decisions solely on merit and in a way that is consistent with the functions of the institution when carrying out business including making appointments, awarding contracts or recommending individuals for rewards and benefits.
 5. **Accountability and Stewardship** – You are accountable for your decisions and actions to the public and the institution’s stakeholders. You have a duty to consider issues on their merits, taking account of the views of others and must ensure that the institution uses its resources prudently and in accordance with the law.
 6. **Openness** – You have a duty to be as open as possible about your decisions and actions, giving reasons for your decisions and restricting information only when other duties clearly demand, such as the duty to protect personal or commercially sensitive information or to defend the wider public interest.
 7. **Honesty** – You have a duty to act honestly. You must declare any private interests relating to your duties and take steps to resolve any conflicts arising in a way that protects the interests of the institution, the public and other stakeholders.
 8. **Leadership** – You have a duty to promote and support these principles by leadership and example, and to maintain and strengthen trust and confidence in the integrity of the institution.
 9. **Respect** – You must respect fellow members of your governing body and employees of the institution and the role they play, treating them with courtesy at all times. Similarly you must respect members of the public when performing duties as a member of the governing body.
- 2.2 The University accepts that it has an obligation to all those with whom it has dealings – and this includes, *inter alia*, students, employees, suppliers, other institutions and organisations and the wider communities the University

serves – to observe and meet these standards. The University’s reputation and the trust and confidence of those with whom it deals are important attributes, the protection of which is of fundamental importance.

3. Obligations incumbent upon staff

- 3.1 Staff must act honestly, diligently and in good faith, placing the interests of the University at the forefront of their minds. The actions of staff must always seek to promote and protect the reputation of the University and decisions taken by staff must be to the benefit of the University and not for any improper or personal motive. Staff should avoid any action (or inaction) which would bring the reputation of the university in to disrepute, would have the potential to do so or which might be perceived as doing so. In carrying out their duties, staff must adhere to the seven Nolan principles of public life, as well as to all relevant regulations, policies and procedures of the University.

4. Obligations incumbent upon students

- 4.1 All students are required to conduct themselves in an appropriate manner in their dealings with other students, staff and external organisations. Students are required to comply with all appropriate policies and procedures and should familiarise themselves with the code of conduct outlined within academic regulation A3-1¹.

5. Confidentiality

- 5.1 Staff should be mindful of confidentiality and must not make public or private statements, outside of the university, regarding confidential university business, without first seeking the permission of the appropriate authority within the university.

6. Anti-bribery and corruption statement

- 6.1 The University prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company. This prohibition applies to any individual employee, agent or other person or body acting on behalf of The Robert Gordon University in order to gain any commercial, contractual or regulatory advantage for the university or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.
- 6.2 With the introduction of the UK Bribery Act 2010, the university has taken steps to introduce appropriate procedures which are rigorously applied and reviewed to ensure that it is fully compliant with the provisions of the Bribery Act.

¹ <http://www.rgu.ac.uk/file/a3-1-academic-appeals-2016-17-pdf-412kb>

7. Hospitality, Gifts and Gratuities

- 7.1 Modest hospitality and the exchange of gifts is an accepted courtesy in the course of a business relationship. However, members of staff must not accept any gifts, rewards or hospitality (or have given to persons with which they have a close connection) from any organisation or individual with whom they have contact in the course of their employment that could cause them to, or might be deemed by others to have caused them to have been, influenced in making decisions as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the university would be likely to provide in return. Staff should refer to the University's Financial Regulations: Receiving Gifts or Hospitality² in this regard.
- 7.2 It is also recognised that from time to time the University itself will be offered or actively seek gifts or philanthropic donations. The University recognises that this activity presents a range of ethical issues and sensitivities. In light of this, the University has codified its approach to the acceptance of gifts through a Gift Acceptance policy³.

8. Conflict of Interest

- 8.1 Conflict of interest refers to situations in which personal interests (which may include financial interests) may compromise, or potentially compromise, professional judgement and integrity and, in doing so, the best interests of the university. A conflict of interest also is present where there is the appearance of a conflict of interest.
- 8.2 The University recognises that it is unrealistic to completely eliminate the potential for conflicts of interest. It considers that the establishment of relationships between its employees and outside bodies – whether government departments, commerce, industry or others – is not only in the public interest but also benefits the university and the individuals concerned. However, it is possible that such relationships may give rise to actual or potential conflicts of interest.
- 8.3 It is incumbent upon staff to declare conflicts of interest and to take no part in any relevant decision making. The Conflict of Interest policy⁴ aims to ensure openness and an appropriate level of scrutiny. Staff should also refer to the University's Financial Regulations⁵.

9. Modern Slavery & Human Trafficking

- 9.1 Robert Gordon University is committed to establishing practices to combat slavery and human trafficking, in line with the Modern Slavery Act 2015. The University seeks to ensure that all processes, policies and supply chains are

² <http://www.rgu.ac.uk/file/robert-gordon-university-financial-regulations-pdf-169kb>

³ <http://www.rgu.ac.uk/file/gift-acceptance-policy-pdf-137kb>

⁴ <http://www.rgu.ac.uk/file/conflict-of-interest-policy-pdf-165kb>

⁵

<https://you.rgu.ac.uk/org/finance/Documents/Robert%20Gordon%20University%20Financial%20Regulations.pdf>

carried out in an ethical and transparent manner. The University's approach to achieving these aims is laid out in full in the annual statement pursuant to section 54(1) of the Modern Slavery Act 2015.

10. Research Ethics

- 10.1 Researchers should be aware that all research carried out should be to the highest ethical standards possible, that it complies with all relevant laws including, where appropriate, laws of other countries; appropriate due diligence is undertaken to minimise risk; and finally, that it adheres to all relevant policies or codes of good practice. Researchers should ensure engagement in research does not cause unnecessary harm to participants, stakeholders, the environment, the economy and other living beings.
- 10.2 The principles of beneficence and non-maleficence are fundamental to all research activity. Beneficence is the requirement to promote the interests and well-being of others. It is the ethical principle of 'doing good' in the widest sense. Non-maleficence is the principle of 'not doing harm'. Both principles must be applied to all entities directly or indirectly affected by the research. In practice these principles frequently conflict, for example as in animal versus human welfare.
- 10.3 Researchers have a moral obligation to attempt to minimise the risk of physical and/or mental harm to themselves, human and animal participants, research subjects, stakeholders and the environment which may result from their research.
- 10.4 The university is committed to the principles of reduction, refinement and replacement of the use of animals in research. On each project it will ensure that the numbers of animals used is minimised and that procedures, care routines and husbandry are regularly reviewed and refined to maximise welfare. The university is committed to the development of alternative methods such as computer modelling, tissue culture and research with non-animal techniques wherever possible. Where the use of animals remains essential, the university is committed to a culture of care and respect for animal welfare.
- 10.5 Advice to research teams on matters and procedures related to research ethics can be found within the Research Ethics Policy⁶ and the Research Governance and Integrity Policy⁷.

11. Failure to comply

- 11.1 Members of staff in material breach of the ethics policy or related procedures will be investigated and may be subject to discipline. Students found to be in breach of this policy may be subject to the non-academic misconduct procedure.

⁶ <https://you.rgu.ac.uk/org/Research-Strategy-and-Policy/SiteAssets/SitePages/Policies%20and%20Procedures/Research%20Ethics%20Policy%20PDF%2060KB.pdf>

⁷ <https://you.rgu.ac.uk/org/Research-Strategy-and-Policy/SiteAssets/SitePages/Policies%20and%20Procedures/Research%20Governance%20and%20Integrity%20Policy%20PDF%20105KB.pdf>

12. Review

- 12.1 This policy will be subject to review every three years, or as required in line with legislative changes.