



Ethics Policy

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1. Introduction

Our values are as follows:

- We put our students and our community at the heart of all that we do.
- We foster excellence, innovation and creativity.
- We celebrate diversity and inclusion and the removal of barriers to success.
- We have high expectations of ourselves, our students and our partners.

This Ethics Policy builds upon our values by setting out seven ethical principles with which we expect all members of our academic community to act. Our academic community includes our trustees, staff, consultants, students and external members on our committees.

Our ethical principles reflect the following provisions as set out in our *Corporate and Academic Governance* document¹, that within the context of the delivery of high-quality education, we will:

- ensure the establishment of a self-critical, cohesive academic community that has a commitment to quality assurance supported by effective quality and enhancement systems
- actively promote and apply equality, diversity and inclusion throughout SSS, and promote an inclusive teaching and learning environment
- ensure respect for the principle of academic freedom, subject to compliance with SSS's equality, diversity and inclusion policies and procedures, and subject to compliance with any legislative or regulatory requirements
- ensure respect for the principle of freedom of speech for all students enrolled on a course delivered by SSS, staff employed by SSS (directly or through UKCAB), external speakers, the trustees and the members, subject to compliance with SSS's equality, diversity and inclusion policies and procedures, and subject to compliance with any legislative or regulatory requirements

2. Ethical principles

Our seven ethical principles are as follows:

2.1 Concern for others

- Act in the interest of others.

All members of our academic community should consider the interests of others.
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2.2 Integrity

- Be honest and truthful.
- Act in accordance with all legal requirements.

¹ See *Corporate and Academic Governance*, Terms of Reference for the Board of Trustees and the Corporate and Academic Board [SSS].

- Act in accordance with our regulations, policies and procedures.
- Declare interests and properly manage any conflicts.
- Be open and transparent in decision-making.
- Maintain independence when engaging with our academic partners, other external stakeholders, and any other outside parties.

All members of our academic community should behave honestly, and should communicate truthfully and openly with each other and outside parties.

No one should misrepresent their position or authority.

All members of our academic community should act in accordance with the law, and our regulations, policies and procedures and those of our academic partners.

No member of our academic community should offer or accept bribes (e.g. money, gifts or hospitality that is disproportionate to the relevant circumstances) either on a personal basis or on behalf of Bloomsbury Institute.

No member of our academic community should accept a gift in connection with their role if it could be intended, or might appear to others to be intended, to influence them to behave improperly.

All members of our academic community should declare outside interests relevant to their activities at SSS and should take steps to manage or 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.

2.3 Responsibility and accountability

- Ensure compliance with our ethical principles.
- Raise concerns relating to ethical matters as they arise.

Those in leadership and management positions have a specific responsibility to set an example in their conduct and to promote and support good ethical behaviour.

All members of our academic community have a responsibility for complying with our ethical principles.

Any ethical concerns that cannot be resolved through our existing policies and procedures may be resolved through the Whistleblowing Procedure (see **Section 4** below).

2.4 Academic freedom and freedom of speech

- Respect the principles of academic freedom and freedom of speech, subject to compliance with our equality, diversity and inclusion policies and procedures, and subject to compliance with any legislative or regulatory requirements.

All members of our academic community should recognise the right of others to academic freedom and the freedom of speech within the law. This does not absolve anyone of the responsibility for treating others with dignity and respect.

2.5 Dignity and respect

- Treat all people with dignity and respect and ensure that nobody is treated less favourably because of a protected characteristic, or because of their social or economic background, or for any other reason.

All members of our academic community should treat each other with dignity and respect, whether on or off our premises and in any environment (physical or virtual).

All members of our academic community should work to promote and achieve a culture free of discrimination.

2.6 Collegiality

- Uphold an inclusive and participatory work and social environment in which we encourage, support and behave appropriately to one another.

All members of our academic community should seek to be a good citizen and work in the best interests of our academic community as a whole.

All members of our academic community should support (and, where applicable, participate in) democratic consultation through our deliberative committee structures.

All members of our academic community should meet the highest standards of good personal and professional conduct.

2.7 Sustainability

- Minimise any negative impact we may have on the environment by effectively managing our resources.

All members of our academic community should be mindful of the impact that their actions or inactions may have on the environment and seek to minimise any negative impact.

3. Application of the ethical principles

It is impossible to devise a single set of rules and procedures that cover every ethical dilemma. Rather, the seven ethical principles should guide the exercise of judgement in each individual case.

These ethical principles are to be applied throughout our academic community, whatever the nature of the activity (e.g. when making a decision) or interaction (e.g. a student interacting with fellow students).

If anyone has a concern that a member of our academic community is not observing this Policy, it should normally be discussed with the individual first.

If this does not resolve the issue, it should then be discussed with a relevant person in authority.

If this does not resolve the issue, we have various policies and procedures through which formal action may be taken. The Whistleblowing Procedure could also be used by a member of our academic community to formally raise a concern (see **Section 4** below).

4. Whistleblowing Procedure

The Whistleblowing Procedure is designed to enable any member of our academic community to disclose information, in good faith, which relates to genuine concerns of suspected serious wrongdoing by a member of staff, a consultant, a trustee or an external member of any of our committees, or dangers relating to the running of SSS, without fear of reprisal, even if such concerns turn out to be mistaken (provided the information was disclosed in good faith and the concerns were genuine).

A suspected serious wrongdoing by a member of staff, consultant or a trustee, or a suspected danger relating to the running of SSS, includes the following:

- A criminal offence (to include fraud, corruption, bribery or blackmail) has been, is being or is likely to be committed
- A breach of a legal obligation has been, is being or is likely to be committed
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health and safety of an individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- A serious breach of our regulations, policies or procedures has been, is being or is likely to be committed
- Obstruction or frustration of the exercise of academic freedom or freedom of speech
- Serious breach of the ethical principles set out in our Ethics Policy
- Unauthorised disclosure of confidential information
- Information tending to show any of the above matters has been, is being or is likely to be deliberately concealed

A whistleblower is a person who raises a genuine serious concern in good faith relating to any of the above matters. The whistleblower may or may not be directly affected by the matter.

All members of staff are protected under the Public Interest Disclosure Act 1998.

4.1 Raising a concern

A concern should be raised as follows:

- if the concern relates to a member of staff or a consultant, it should be raised with the individual's line manager or direct report;
- if the concern relates to Trustee, it should be raised with a Trustee;
- if the concern relates to an external member of one of our committees, it should be raised with the Chair of the committee.

The person to whom the concern is raised will determine whether it falls within the remit of the Procedure.

If the concern does not fall within the remit of the Procedure, the concern will be dismissed.

The whistleblower will have a right of appeal to the Board of Trustees whose decision on this point shall be final.

4.2 Investigation

If the concern comes within the remit of the Procedure, SSS's Chief Executive Officer (or nominee) will appoint an Investigating Officer. If the concern relates to the Chief Executive Officer, a Trustee will appoint an Investigating Officer.

If a person to whom the concern relates is a member of staff, the Investigating Officer will not be that person's line manager.

The Investigating Officer will normally interview any person to whom the concern relates and any other relevant persons, including the person who has raised the concern.

If a person to whom the concern relates is interviewed by the Investigating Officer, that person will have the right to be represented or accompanied by a representative, provided such person is not acting as a legal representative.

At the end of the investigation, the Investigating Officer will present a written report to the Chief Executive Officer (or to the Trustee if the concern relates to the Chief Executive Officer). The report will set out the Investigating Officer's findings and recommendations.

4.3 Decision

4.3.1 Concern related to a Trustee

If the concern relates to a Trustee, the matter will be referred to the Board of Trustees. The Board could decide to reprimand the Trustee or, ultimately, to terminate the Trustee's term of office.

4.3.2 Concern related to a member of staff, consultant or external member of a committee

If the concern relates to a member of staff, a consultant or an external member of one of our committees, the Chief Executive Officer (or nominee) will make a final decision on the basis of the Investigating Officer's written report.

The Chief Executive Officer (or nominee) could decide to instigate action against the member of staff under our disciplinary procedures, or against a consultant or an external member of one of our committees under the provisions of their contract.

At the conclusion of the proceedings, the Chief Executive Officer (or nominee) will present a confidential report to the Board of Trustees setting out the concern, the findings and recommendations of the Investigating Officer, and the outcome.

4.3.3 Information provided to the person raising the concern

The Board of Trustees will determine what information, if any, should be provided to the person raising the concern.

4.3.4 Confidentiality and anonymity

A concern that is raised anonymously will not be dealt with.

The investigation will be dealt with on a confidential basis.

A request by a whistleblower to remain anonymous during the investigation will be respected, unless the Investigating Officer determines that disclosure is critical to the investigation.

4.3.5 Protection for whistleblowers

No detriment will be suffered by any whistleblower who takes action under this Whistleblowing Procedure, provided any information was disclosed in good faith and any concerns were genuine, even if such concerns turn out to be mistaken.

In addition, all members of staff are protected under the Public Interest Disclosure Act 1998.

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