



Procedure 1.6 Ethics protocols

1 Purpose

The purpose of these protocols is to provide guidance to staff and users of the Academy in assessing the many and sometimes intricate decisions they have to make. This should signal to all parties that they can have confidence in what the Academy does and the manner in which it is done.

All staff should ensure that all activities for which they are responsible comply with these protocols. Concerns about procedures or administrative or support activities should be raised with line managers in the first instance. Similarly, clear breaches of the Ethics protocols should be referred to senior managers. Existing mechanisms within the organisation of the Academy should be used to resolve concerns or refer as appropriate.

2 What do the protocols cover and to whom do they apply?

These protocols set out guiding principles and how the Academy intends to apply them.

- they apply to all aspects of governance
- all those covered by the protocols are personally accountable for operating within their scope and intent
- all staff, agents and collaborative centres are covered
- the Academy expects all organisations whose staff or students have commercial dealings with us to respect these protocols
- the Academy expects those who serve on our decision-making bodies to respect these protocols
- the Academy expects organisations or individuals who work with us to respect our ethical position

3 Why Ethics protocols?

The Academy has a policy and procedural framework on a range of issues such as equal opportunities and diversity, health and safety and the staff handbook outlines the Academy's stance on a number of matters. We also accept the values covered in the 'Seven Principles' as outlined by the Nolan Committee. Although this was primarily aimed at people in public life, we believe that those values equally apply to the values of the Academy.

4 The guiding principles

- **Selflessness** – all staff whether collectively or individually should take decisions solely in terms of student 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 positions should not place themselves under any financial



obligation to outside individuals or organisations that might influence them in the performance of their official duties

- **Objectivity** - in carrying out operations, including making appointments, awarding contracts or recommending individuals for rewards and benefits, holders of these positions should make choices on merit.
- **Accountability** – staff and agents are accountable for their decisions and actions to the organisation and those that they serve and must submit themselves to whatever scrutiny is appropriate to their position.
- **Openness** – holders of these positions 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 learning environment interest clearly demands.
- **Honesty** - holders of positions have a duty to declare any private interests relating to their duties and take steps to resolve any conflicts arising in a way that protects the learning environment.
- **Leadership** - holders of positions should promote and support these principles by leadership and example.

5 The following elements comprise our ethical framework:

5.1 In relationships with others:

- treat colleagues, students, customers and suppliers respectfully and professionally, taking account of confidential issues when appropriate
- deal courteously with those who hold opinions which differ from ours
- respect cultural differences
- have open and explicit relationships with external parties

5.2 In our work:

- operate with honesty and integrity in all our work, taking steps to identify and deal with corrupt practices and professional misconduct
- be open and transparent in making decisions and undertaking activities
- reach conclusions based on professional practice having carefully considered all views
- provide clear and concise information
- disclose conflicts of interest and actively manage them

- work within the UK legal framework and if attending events abroad then operate according to local laws
- ensure major decisions are transparent and securely based on objective assessment and set procedures
- recognise appropriately the intellectual support and operational contribution of others
- consider ethical challenges which arise from the ever-changing environment

5.3 In financial record keeping:

Truthful and accurate recording and reporting of information is critical to the Academy's ability to make responsible decisions. Accounting records are relied upon to produce reports for the Academy's management. Therefore, the financial statements, the accounts and records on which they are based must accurately reflect all transactions and comply to all legal and accounting requirements. The system of internal control is designed to provide this information.

- it is the aim of the Academy to fully and fairly disclose its compliance with applicable accounting principles, laws, rules and regulations and to make full, fair, accurate, timely and understandable disclosure in reports
- all employees have a responsibility to ensure that accounting records do not contain any false or intentionally misleading entries. Information on which the accounting records are based is the responsibility of staff.
- no payment or transfer of funds or assets will be made that is not authorised, properly accounted for and clearly identified on the Academy's accounts. Payment or transfer of funds and assets are to be used only as specified in the supporting documents and must pertain to Academy business
- no member of staff or representative, at any level, may authorise any payment or use any funds or assets for a bribe, gift, reward or similar payment that is directly or indirectly for the benefit of any individual, which is designed to secure favourable treatment for the Academy
- it is Academy policy not to contribute any funds or assets to any political party organisation, committee or any individual for the purposes of public office

5.4 In acceptance of payments:

- no member of staff, at any level, should seek or accept either directly or indirectly, any payments, fees, services or other gratuities (irrespective of size or amount) outside the normal course of their duties from any other person, company or organisation that does or seeks to do business with the Academy



- gifts of cash or cash equivalents of any amount are strictly forbidden
- the receipt of common courtesies, sales promotion items of nominal value, appropriate and associated with Academy activities are permissible, but should be notified to the CEO / Principal
- all dealings with customers or others doing or seeking to procure business with the Academy shall be conducted solely on a basis that reflects both the Academy's best interests and its high ethical standards
- the Academy does not permit the providing of common courtesies, entertainment, etc, for potential or actual customers or others involved in the Academy's activities, in a manner appropriate to the Academy's relationship and associated with business discussions

5.5 In conflicts of interest:

- the Academy expects all members of staff, at all levels, to exercise good judgment and the highest ethical standards in private activities outside the Academy that may, in any way, affect the reputation of the Academy
- staff shall exercise, at all times, particular care that no detriment to the interest of the Academy may result from a conflict between those interests and any personal interests which the individual may have
- in particular, every member of staff has an obligation to avoid any activity, agreement, business interest or other situation that might, in fact or in appearance, cause them to place his or her own interest, or that of any other person, above obligation to the Academy. The appearance of such an action may tend to impair confidence even if the individual may not have done anything wrong
- therefore, to this end, all members of staff must avoid any, associations or other relationships that could conflict with their responsibility to make objective decisions in the Academy's best interests
- no member of staff shall, for personal or for any other person's or entity's gain deprive the Academy of any business opportunity or benefit which could be construed as related to any existing or reasonably anticipated future activity of the Academy
- no member of staff who learns of any such opportunity through their association with the Academy is allowed to disclose it to a third party or personally invest in the opportunity without first offering it to the Academy



5.6 Confidentiality

All members of Academy staff are bound by the Data Protection Procedure (1.7)

- All members of staff are responsible for safeguarding and keeping confidential any information that the Academy considers to be of a confidential or sensitive nature. Such information includes, but is not limited to financial records, reports, marketing and strategic planning information, employee related documents, unpublished manuscripts and information relating to other materials that the Academy would not want disclosed to any unauthorised recipient, or might be harmful to the Academy or its students if disclosed whether or not such information is marked 'confidential'.
- confidential information also includes information concerning possible transactions with other colleges or information about the Academy's students, or other trading partners, which the college is under an obligation to maintain as confidential.
- no member of staff may use confidential information for their own personal benefit or the benefit of persons or entities outside the Academy, and must be careful so as not to remove any confidential or sensitive information from the Academy's premises without express authority and should safeguard the information from unintended disclosure or loss.

5.7 Laws and regulations

- the Academy requires all members of staff to comply with all applicable laws and regulations.
- all staff members have an obligation to comply with all laws and regulations and policies and procedures and to promptly alert management of any deviation from this.
- discussions regarding confidential, sensitive or proprietary information are not permissible. Staff should seek guidance from the CEO / Principal.

5.8 Dealing fairly

- each member of staff should endeavour to deal fairly with students, other external entities and employees. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

5.9 Duty to report violations

- no retribution against any individual who reports violations of this policy in good faith will be permitted. The Academy will investigate any matter which is reported and will take any appropriate corrective action.



5.10 Violations of ethics protocols

- violations of any of the foregoing provisions may expose the Academy and the individuals involved to legal action and possible criminal action.
- staff members who violate this policy are subject to appropriate disciplinary action, up to and including termination. Any alleged violations of this procedure will be reviewed by senior management, who will determine the appropriate action to take.