ETHICS POLICY

> **The University seeks to promote the highest standards of scientific, scholarly and professional integrity and to give due consideration to the ethical, social and environmental issues arising from its activities.**
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> The University intends that all its activities should have positive impacts on its stakeholders and should improve the quality of the living, studying and working environment of its staff and students
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> The University expects to:
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> - Maintain high ethical standards incorporating rigour, respect and responsibility across all its activities
> - Undertake activities that are environmentally sustainable and conform to high standards of environmental consideration
> - Link effectively with the local and regional community, be a good neighbour and communicate honestly
> - Be an employer of choice, treating employees fairly and with respect

1. Aims and Objectives

1.1 The aim of this policy is to provide a framework for both professional practice and decision-making about ethical issues as they occur during the course of core University activities. The policy explores many of the key areas in which ethical considerations may occur, and sets out procedures for the formal consideration of such matters within appropriate University fora under the guidance of the University Ethics Committee. This Policy complements other strategies, policies, and plans which are in place at the University, and those of external professional bodies, to which links are provided where relevant.

1.2 Ethical issues arise across all spheres of University activity: from research and education to enterprise, student recruitment and alumni relations. The University endorses the key principles of rigour, respect and responsibility as set out by the Department for Business, Innovation and Skills.[1] These principles should inform every aspect of University operations by staff, students and lay governors, while they seek to create the culture of academic freedom necessary for first-class research and education.

1.3 Specifically, this Ethics Policy will address the following topics:

- University Governance and the University Ethics Committee
- Research
- The Student Experience
- Finance

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[1] "Rigour, respect and responsibility: A universal ethical code for scientists", Department for Business, Innovation & Skills:
http://www.bis.gov.uk/assets/bispartners/goscience/docs/u/universal-ethical-code-scientists.pdf

- Sustainability
- Human Resources
- External Relations and Knowledge Transfer
- Procedures for Colleges and Professional Services in relation to Ethical Issues
- The role of the University Ethics Committee and College Ethics Committees

2. University Governance and the University Ethics Committee

2.1 The University has in place robust mechanisms for ensuring accountability of its processes and decisions and for the management of risks. The University expects its members to abide by the seven principles identified by the Committee on Standards in Public Life[2] (selflessness, integrity, objectivity, accountability, openness, honesty and leadership) and with the guidance to universities which has been provided by the Committee of University Chairmen in its *Higher Education Code of Governance[3]*. The University of Exeter is mindful of the long history of the University as an academic community with a rich tradition of collegiality, of the institution's impact on wider society, and its mission to ensure public benefit through our research and education. Further information about our governance is available to all staff and students in our Strategic Plan and on our website.[4]

2.2 The Ethics Policy has been prepared by the University Ethics Committee (UEC) in consultation with the institution's key stakeholder groups. The UEC advises as necessary on ethical issues arising from University related activities within the context of the University's wish to be a socially responsible organisation with high ethical standards and a tolerant, liberal, open minded community.

2.3 The UEC is charged with sustaining a University-wide awareness of ethical issues arising especially from research and from other experiments, projects and demonstrations, and from teaching and learning. The UEC is responsible for producing guidelines for the conduct of activities with ethical implications and for ensuring that all University units have in place proper procedures for the consideration and conduct of activities with ethical implications.

2.4 The UEC will also consider and give advice on ethical matters referred to it from Colleges (and see Section 10 below) and on conflicts of interest if required. An actual or potential conflict of interest arises when the University or an individual is presented with a situation where corporate or individual interests, financial, ethical, personal or other, conflict or appear to conflict with the principles of this Ethics Policy and the primary mission of the University. By fostering a culture of transparency regarding intra and extramural affairs, the University seeks to avoid and minimize conflicts of interest, and strongly encourages members to disclose interests according to the University's Conflict of Interest Policy[5].

2.5 UEC members include academic, lay, student and external representatives; the committee is chaired by the Deputy Vice Chancellor for Research and Knowledge Transfer. The organogram in Section 11 below illustrates the inter-relationship

[2] http://www.public-standards.gov.uk/
[3] http://www.universitychairs.ac.uk/wp-content/uploads/2015/02/Code-Final.pdf
[4] Strategic Plan 2015: http://www.exeter.ac.uk/about/vision/strategicplan/
Further information on Governance: http://www.exeter.ac.uk/about/governance/index.shtml
[5]
http://www.exeter.ac.uk/media/universityofexeter/financeservices/pdfs/Investment_Policy_February_2019.pdfwww.exeter.ac.uk/media/universityofexeter/secureall/research/UoE_CoI_V1.1_CC_GS_for_web_publication_04102018.pdf

between College Research Ethics Committees, the UEC, Senate and the Council of the University.

3. Research and Learning

3.1 The University of Exeter is research intensive and dedicated to furthering knowledge in a responsible and exacting manner. In the conduct of research by staff and students, the University strives to protect the safety, rights, dignity, confidentiality and anonymity (except where covered by an appropriate protocol) of research participants, the welfare of animals and the sustainability of the environment. The University also endeavours to safeguard the wellbeing, rights and academic freedom of researchers and the reputation of the University as a centre for properly conducted, high quality research. The University complies with the *Concordat to Support Research Integrity*[6] maintains a *Code of Good Practice in the Conduct of Research* and a Student Academic Misconduct Code which it requires all staff and student researchers to follow (including during investigations undertaken as part of a degree programme).[7]

3.2 Ethical issues are manifest in a wide variety of research activities and arise especially when the conduct of research involves the interests and rights of others. The adoption of an ethical position in respect of such research requires that the researcher observes and protects the rights of would-be participants and systematically acts to permit the participants to exercise those rights in full accordance with UK law. Ethical practice in such cases requires that participants and/or legal guardians, at a minimum, be fully informed, free to volunteer, free to opt out at any time without redress, and be fully protected in regard to safety according to the limits of best practice.

3.3 The following list of issues is intended to highlight key areas of particular ethical relevance in research. The list should not be considered in any way exhaustive, and in areas of doubt individuals should consult the Research Ethics and Governance Office:

i) Compliance with relevant legislation in both spirit and letter. Statutory controls and codes of practice must be observed at all times.
ii) Adherence to best practice of relevant professional bodies (e.g. the British Psychological Society *Code of Ethics and Conduct* and British Educational Research Association *Revised Ethical Guidelines for Educational Research*)[8].
iii) Compliance with current Data Protection Law, and respect for privacy and confidentiality.
iv) Freedom of information issues under the Freedom of Information Act (2000).
v) Consideration and respect for relevant Intellectual Property legislation.
vi) Adherence to the Human Tissue Act (2004).
vii) Adherence to Code of Practice issued by the Human Fertilisation and Embryology Authority where relevant.
viii) Adherence to relevant contractual and commercial practices
ix) Respect for relevant international laws and conventions such as the Universal Declaration of Human Rights[9] and the Covenant of Civil and Political Rights[10].

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[6] http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2012/the-concordat-to-support-research-integrity.pdf
[7] The Code of Good Conduct in the Practice of Research is available at the following URL: https://www.exeter.ac.uk/cgr/researchethics/codesandpolicies/
[8] http://www.bps.org.uk/the-society/code-of-conduct/code-of-conduct_home.cfm and http://www.bera.ac.uk/publications/guidelines/
[9] http://www.un.org/Overview/rights.html

x) Consideration of the source of research funding, contractual obligations, and the direct and indirect applications of advances in research.

xi) Ethical issues are given added salience where research involves children and adults in a potentially vulnerable situation, and such research requires compliance with relevant legislation such as the Mental Capacity Act 2005.[11]

xii) Considerations pertaining to the involvement of living animals in research according to the principles of replacement, reduction, and refinement, as developed and promoted by the UK Research Councils.

xiii) All relevant projects carried out in strict accordance to the Animals (Scientific Procedures) Act, 1986, will be governed by the University of Exeter Animal Welfare and Ethical Review Board which reports to the UEC.

xiv) Full compliance with the Department of Health's Policy Framework on Health and Social Care Research, Clinical Trials Directives and relevant Health Research Authority procedures.[12]

xv) Awareness and consideration of potential and perceived conflicts of interest; risk assessment; sustainability; international relations.

xvi) Compliance with export controls and sanctions regimes

xvii) Falsification, fabrication, plagiarism, collusion, breach of duty of care and other forms of research or academic misconduct including inappropriate authorship or lack of authorial recognition[13].

4. The University Working Environment and Learning Experience

4.1 The University's commitment to rigour, respect and responsibility impacts directly on the experience of staff and students: from the need for transparency and fairness in recruitment and selection through to the commitment of the University to provide a curriculum that is academically rigorous and relevant to society incorporating specific modules on ethics where appropriate. In addition, the Students' Guild and FXU ensure that ethical issues feature strongly in both their guidance policies and their provision of welfare and support so that issues concerning substance abuse, harassment, bullying, and financial pressures for example, are identified and addressed speedily with professionalism and care.

4.2 The University encourages, supports and enables students to develop as honest, independent and active learners, who can also provide leadership, support and mentoring to others. We empower students to take responsibility for their personal and professional development and enhance their leadership and employability skills, enabling them to become sought after nationally and internationally, whether for further study or employment. We work with the Students' Guild, FXU and the Athletic Union to actively encourage participation in extra-curricular activities, including sport, music and volunteering. Widening Participation forms one of the central themes of the Outreach activity of the University in which we aim to raise awareness of, and aspirations to, higher education both in general and at Exeter. By building sustainable and meaningful relationships with stakeholders, we hope to have a real impact on the decisions young people make about their progression through further and higher education.

4.3 The University of Exeter believes that the diversity of its community is an essential part of its values and enriches employment, research, studying and learning experiences. We are committed to supporting students and staff to work and study in an environment that minimises harmful stress, is healthy and free

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[10] http://www2.ohchr.org/english/law/ccpr.htm

[11] See the 2010 ESRC *Framework for Research Ethics* and the MRC *Medical Research Involving Children.*

[12] https://www.hra.nhs.uk/

[13] http://www.exeter.ac.uk/cgr/researchethics/integrity/

from unlawful discrimination, and promotes equality of opportunity, being accepting of differences and conscientious in respecting other backgrounds. The University's policies support the objective of creating a culture in which the value of diversity is recognised and in which the values of respect for others, equality and dignity of treatment and openness are at the core of everything we do. Policies include a Disability Policy Statement, an Equal Opportunities Policy, Public Interest Disclosure Policy, Race, Disability and Gender Equality Policies, and Guidance on Supporting Staff and Students Experiencing Mental Health Difficulties.[14]The University offers excellent resources and facilities to assist with this aim, including the provision of a dedicated Disability Resource Centre and the support of an Equality and Diversity manager. Staff health and wellbeing is of great importance and a number of support services are available. Staff stress, wellbeing and support are reviewed in light of staff feedback, through mechanisms such as the Employee Engagement Survey, and such feedback is considered very seriously and acted upon by University Senior Management. It is the responsibility of all managers within the University to monitor and manage staff workloads appropriately and to give due recognition to family and other commitments.

4.4 We aim to ensure that academic services, administrative systems and educational structures are efficient, effective, transparent and enabling. We equip staff with appropriate training, effective support and rewards to provide them with the means to fulfil their goals and ambitions as excellent teachers, researchers and facilitators of learning. The University insists on the highest standards of conduct from its employees in terms of their relationships with colleagues and with students[15], and looks to ensure full compliance with relevant legislation.

4.5 The University rigorously defends the academic freedom of its staff to teach and discuss challenging and urgent issues, and to challenge conventional wisdom, within the constraints imposed by the law. All staff, however, need to be mindful of ethical issues arising from the discussion of such topics, and if in doubt, must refer the matter to their College Research Ethics Committee.[16]

4.6 The following list of issues highlights key areas of particular ethical relevance in teaching and learning:

1. Compliance with relevant legislation (e.g. copyright legislation) in both spirit and letter, with all internal regulations, such as those governing computing use, and procedures such as those on plagiarism.[17]
2. The need to treat all students equally and fairly, and to interact with them in a respectful and dignified manner.[18]
3. The need to respect students' confidentiality, except where this could lead to harm to the student, or be in breach of the law.
4. The importance of considering the needs of all students and guidance on accessibility when designing modules, course materials or assessments[19].

5. Finance

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[14] http://www.admin.ex.ac.uk/personnel/policies.shtml
http://www.exeter.ac.uk/staff/policies/calendar/part1/otherregs/mentalhealthdifficulties/
[15] http://www.admin.ex.ac.uk/personnel/%7Edocs/professionalconductcode.pdf
[16] http://www.exeter.ac.uk/staff/employment/hrpoliciesatoz/
[17] http://as.exeter.ac.uk/it/regulations/;
[18] http://www.exeter.ac.uk/staff/equality/
[19] https://as.exeter.ac.uk/tqae/inclusiveteaching/

5.1 Oversight responsibility for matters relating to ethical investment rests with the University Council. The annual report on investment prepared by the Chief Financial Officer, as described in section 8.3 of the University Investment Policy[20], will be discussed annually by the University Ethics Committee to ensure there is an opportunity for any concerns of members of the Committee to be highlighted and raised with Council. This does not replace the opportunity for members of the University to contact the CFO with any concerns around investment, as set out in section 8.5 of the Investment Policy.

5.2 The informed acceptance of gifts by the University and individuals will be made in strict accordance with the principles of this Ethics Policy and with advice from the UEC where appropriate. All gifts should be compatible with the mission of the University and of its strategic priorities as well as in compliance with current UK treasury regulations and UK, European and international laws.[21]

5.3 The University manages expenditure on all goods and services to ensure value for money. University procedures and legislation (national and EU) provide the framework for University staff to be objective, fair, transparent, honest and legal in their procurement activity. Procurement activity is supported by Procurement Services, whose members follow the Professional Code of Ethics of the Chartered Institute of Purchasing and Supply (CIPS).[22] The University of Exeter has gained full Fairtrade status for the products sold on its campuses in line with its long term strategy to recognise corporate responsibility and sustainability.[23]

6. Sustainability

6.1 Environmental sustainability and climate change are probably the greatest issues facing humankind in the twenty-first century: they are a major focus of Exeter's research and teaching activities and a key responsibility for the staff, students and governors of the University.[24]Through our association with the UK Met Office and academic developments in the Science Strategy and the Environment and Sustainability Institute at our Cornwall campus, the University is developing a high profile in climate change research and education.

6.2 The University has developed a Carbon Management Plan which develops the sustainability statements in the University Strategic Plan into a set of targets and actions which set the University on a path to reduce carbon dioxide emissions by 60% by 2050, equivalent to a reduction of 2% per year. It further aims to integrate carbon and energy management into all University processes and to maximise the influence of the University in reducing emissions through education and research.[25]

7. External Relations, Knowledge Exchange and Impact

7.1 The University of Exeter believes that External Relations and Knowledge Exchange, and the resulting collaborations with partners can be a key determinant of success in research and teaching. We aim to have a positive impact in our external

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http://www.exeter.ac.uk/media/universityofexeter/financeservices/pdfs/Investment_Policy_February_2019.pdf
[21] http://www.exeter.ac.uk/staff/employment/codesofconduct/bribery/
[22] http://www.cips.org/
[23] http://www.fairtrade.org.uk/
[24] Sustainable Development is understood in accordance with the report of the Brundtland Commission, *Our Common Future* (Oxford University Press, 1987).
[25] http://www.exeter.ac.uk/sustainability/

relations and provide maximum public benefit in accordance with our charitable status. In so doing we aim to underpin our external affairs with ethical considerations concerning the selection and development of external relationships and the criteria by which we engage in commercial activities. Relevant sections of external organisations which undertake activities within University premises, including the businesses based at the University's Innovation Centres, are expected to abide by the principles of this Policy.

7.2 The University is a charity and 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 2006[26].

7.3 The University looks to engage with external organisations which display responsible employment practices, adopt sustainable environmental practices and demonstrate excellent corporate governance. Internationally, the University engages with a range of countries and individual corporations with a view to increasing the international impact of its research and teaching. In so doing we seek to promote research excellence, good governance and the observance of the rule of law. Regionally, the University acts to contribute positively to the social cohesion and sustainability of its local and regional community.

8. Procedures for Colleges and Professional Services in relation to Ethical Issues

8.1 Under the guidance of the University Ethics Committee, each College is required:

- to comply with the University of Exeter's Research Ethics Framework[27]
- to report to UEC on an annual basis
- to refer cases to the UEC (via the Research Ethics & Governance Office) that require decision or require advice/opinion external sources such as the University's solicitors

9. Responsibilities of the UEC in relation to Colleges and Professional Services

9.1 The responsibilities of the UEC in respect of Colleges and the Professional Services are as follows:

- to develop policy and guidelines, and keep them under review;
- to approve procedures or statements;
- to arrange the provision of appropriate training for individuals and ethics officers with specific responsibility for ethical issues;
- to consider and offer guidance on cases of uncertainty and make decisions on cases which cannot be resolved by Research Ethics Committees.
- to consider annual reports from Colleges and the Professional Services on the management of ethical issues, offering advice and making recommendations as appropriate on the operation of procedures;

10. Annual Reports to the University Ethics Committee

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[26] http://www.legislation.gov.uk/ukpga/2006/50/contents
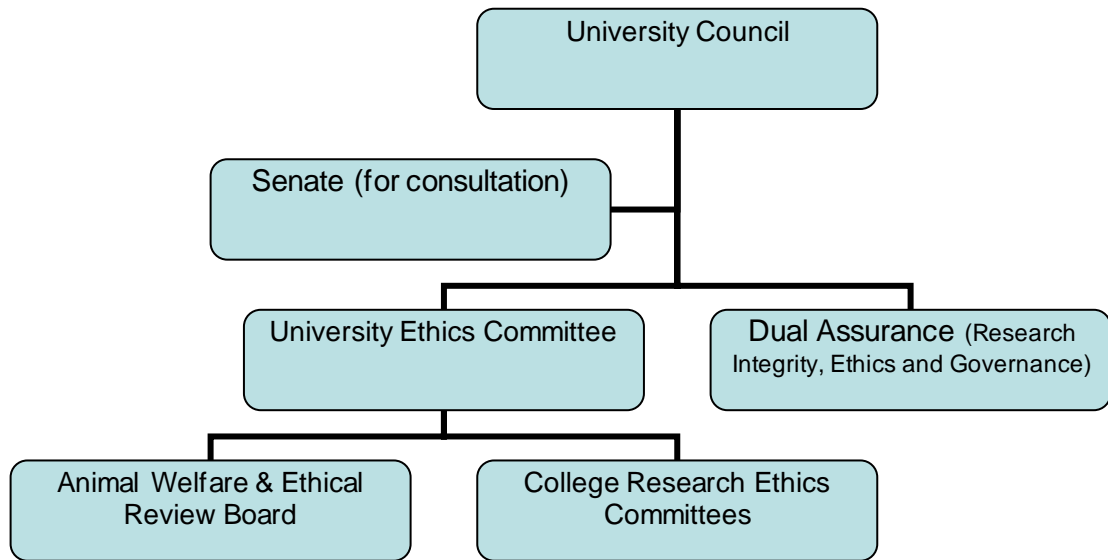[27] http://www.exeter.ac.uk/cgr/researchethics/codesandpolicies/

10.1 Each College and the Professional Services, through their designated officer(s), must conduct an annual review of its position in respect of ethical issues and report to the University Ethics Committee on an annual basis. It is expected that the annual reports to the Ethics Committee will include the following (a pro forma for reports will be provided):

- Details of any changes to the approved procedures;
- Summary of action taken by the Ethics Committee including details of the number of cases considered (staff and student), the number of cases approved and Certificates issued, and any particular difficulties encountered or consequent action taken;
- Where appropriate, the number of cases referred to external committees;
- Any issues for consideration by the University Ethics Committee.

10.2 The University Ethics Committee will consider the annual reports, offer advice and recommendation as appropriate, and report to Council on any outstanding difficulties. Colleges with nothing to report will be required to submit a signed statement to that effect on the pro forma.

11. <u>Ethics Committees at the University of Exeter</u>

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  │ Senate (for consultation) │─────────┤
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        │ University Ethics Committee   │    │ Dual Assurance (Research          │
        └──────────────────────────────┘    │ Integrity, Ethics and Governance) │
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│ Animal Welfare &      │   │ College Research Ethics  │
│ Ethical Review Board  │   │ Committees               │
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