

## Code of Ethical Conduct

### Introduction

The values of the School, as affirmed in its Mission and Strategy, commit the School to the highest standards of ethical conduct. To support this commitment, the School has developed a number of guiding principles as a reference point for ethical decision-making by School staff and directors. These guiding principles are based on the seven principles of behaviour arising from the [Nolan Committee Report on Standards in Public Life](#) (demonstrating selflessness, integrity, objectivity, accountability, openness, honesty, and leadership), as well on the School's core values.

### Guiding Principles

Ethical conduct means acting consistently in a way that is ethical and fair and encouraging others to do likewise.

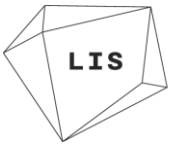
Specifically, the School, its directors and individual members of staff will:

- Act in the greater interests of the School, students and the wider community, putting individual interests aside;
- Act with integrity, in accordance with the law and the School's policies, regulations and procedures, declaring interests and managing conflicts appropriately;
- Be fair, acting without discrimination or bias of any kind, but rather acting with objectivity and impartially and on merit, and promoting equality in all activities;
- Be accountable, taking responsibility for their actions and being ready for and open to scrutiny;
- Be open and transparent in their actions and decisions;
- Be truthful and honest in all their actions;
- Provide ethical leadership to others, role-modelling and actively promoting these ethical principles and the values of the School, and challenging poor behaviour wherever it occurs.

The School, its directors and individual members of staff will also put the School's values at the heart of their decision-making and actions. They will:

- Be kind;
- Be honest;
- Be brave;
- Keep learning;
- Welcome otherness.

Given the variety and complexity of ethical questions that may arise in the course of carrying out the School's business, this statement of ethical principles can only serve as a general guide. The statement is therefore deliberately broad and brief. The School does not attempt to set out a list of ethical or unethical activities, but instead has established mechanisms by which ethical decisions can be taken. To this end, this statement of ethical principles is supported by a list of questions, designed to aid School directors and staff members in making ethical decisions, and by a set of policies, regulations and procedures that ensure that ethical behaviour is embedded in the way in which the School operates day-to-day. Where a director or staff member



is confronted with an ethically ambiguous situation, they should refer to this code, the list of questions and supporting policies, as well as seek advice from appropriate colleagues within the School.

### Questions to aid decision-making

This list of questions is designed to act as an aid to directors and staff members when dealing with decisions at the School that have ethical considerations:

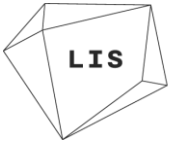
- Does the proposed activity create conflicts of interest or place obligations on the School that are contrary to the Code of Ethical Conduct's guiding principles?
- Is the decision or activity within the law and within the guidelines set out by the School's policies, regulations and procedures?
- Which parties would be affected by the decision or activity? Would any of these parties criticise the decision or activity, and what would be the grounds of their complaint?
- As well as the risk of harm, have you considered positive obligations that you owe to those affected by your decision or activity?
- Have you considered and appropriately weighed any potentially negative effects of the decision or activity for staff, students, the School or stakeholders? Does the proposed decision or activity have a negative effect on a particular protected group or minority?
- Is your understanding of the evidence upon which you have based your decision robust and fair?
- How would you justify your decision or action to your manager or a colleague or a family member? How would you justify it to the media?
- Are you confident that your decision is the best one in the circumstances?
- Where you are dealing with an external party, are you confident that they are ethically and financially sound? What checks have you undertaken to confirm this?

### Supporting policies, regulations and procedures

Taking ethical issues into account should be part of day-to-day activity and decision-making. In addition to this Code and the list of questions above, the School's ethical guidance is captured in its policies, regulations and procedures. Key documents are listed below:

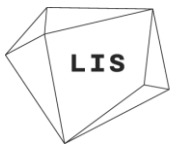
- Dignity at Work and Study Policy and Procedure
- Whistleblowing Policy and Procedure
- Anti-Bribery and Corruption Policy
- Equality, Diversity and Inclusion Policy
- Disability Policy
- Research Ethics Policy
- Admissions Regulations and Procedures
- Staff Code of Conduct for Personal Relationships (in the Staff Handbook)
- Safeguarding Policy and Procedure (including Prevent)
- Data Protection Policy
- Academic Freedom Policy
- Freedom of Speech Code of Practice
- Health and Safety Policy

### Monitoring and Review



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This Code and its effectiveness will be reviewed annually by the Audit, Risk and Compliance Committee, and will recommend any changes for authorisation by the Board of Directors.



## Version Control

<b>Name of policy/procedure:</b>	<b>Code of Ethical Conduct</b>
<b>Document owner:</b>	Hannah Kohler, Director of Admissions and Student Support
<b>Date Originally Created:</b>	02/2019
<b>Related documents: (eg associated forms, underpinning processes, related policies or overarching policies)</b>	Dignity at Work and Study Policy and Procedure Whistleblowing Policy and Procedure Anti-Bribery and Corruption Policy Equality, Diversity and Inclusion Policy Disability Policy Research Ethics Policy and Procedure Admissions Regulations and Procedures Staff Code of Conduct for Personal Relationships, in the Staff Handbook Safeguarding Policy and Procedure (including Prevent) Data Protection Policy Health and Safety Policy Academic Freedom Policy Freedom of Speech Code of Practice

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	20/02/2019	Original draft
2	Jasper Joyce (Director of Finance and Operations)	25/02/2019	Minor wording changes
3	Ed Fidoe (Chief Executive)	05/03/2019	Minor wording changes
4	Hannah Kohler (Director of Admissions and Student Support)	08/07/2019	Updated School values; inserted links to Policies
5	Board of Directors	12/07/2019	Approved
6	Academic Council	18/12/2019	Agreed but requires update given general update to governance articles in light of decisions to pursue NDAPs
7	Academic Council	16/03/2020	Agreed as part of package of governance documents
8	Head of Quality	ExCo Chair's action 02/02/2023	Updating of committee name: Audit, Risk and Compliance Committee