Imperial College London

AN ETHICS CODE FOR IMPERIAL COLLEGE LONDON

INTRODUCTION

Imperial College London is committed to delivering world class research and education in science, engineering, medicine and business to the highest intellectual standards, achieved though objective judgement. This is the context for this Code, which establishes an overall ethics code for Imperial College.

This Code is not intended to replace the College's established policies and procedures relating to ethics which are listed in Appendix 1. Those carrying out research or other activities governed by established policies and procedures relating to ethics should continue to follow these established policies and procedures in relation to such matters, as well as the wider requirements set out in this Code.

Whilst it is impossible to devise a single set of rules to resolve every ethical dilemma, this Code is intended to provide a starting point to help members of the College to identify and tackle ethical issues faced in the course of their activities at Imperial.

The whole of the College's community, including all its staff, students, governors and associates are expected to comply with this Code and to behave in line with the principles set out in it (and references to "members", "members of the College" or "members of the College community" should be construed as referring to all such people.) For the avoidance of doubt:

(a)   this includes where College staff engage in consultancy arrangements; whether or not through Imperial Consultants,

(b)   those issued with honorary contracts from the College are expected to comply with the terms of this Code in the same manner as staff members.

The College will look to those in senior positions in particular to set an example in their conduct and to promote and support good ethical behaviour.

The Code sets out a number of key principles and behaviours which the College expects of its members. It is structured around the following themes:

➢ Section 1: Integrity as the guiding principle

➢ Section 2: Facilitating a leading academic community

➢ Section 3: Third party interactions

➢ Section 4: Other ethical matters.

Section 5 deals with ethical governance of matters raised pursuant to this Code. It is not intended to replace existing review mechanisms but is intended to supplement them and to provide for appropriate reporting and accountability at the highest level in cases not falling under other review procedures. Please note that nothing in this policy is intended to affect the application of the College's whistle blowing policy.

In appropriate cases, breaches of the Code and related policies may be treated as offences under the College's disciplinary procedures.

SECTION 1: INTEGRITY AS THE GUIDING PRINCIPLE

The College is committed to demonstrating independence, honesty and transparency in all its activities and expects its staff, students and other members of the College community to show the same commitment.

Members are expected to:

A.   **Be honest and truthful** in their dealings with each other and with third parties

B.   **Manage conflicts in interests** in line with the College's procedures

Members should declare outside interests relevant to their activities at the College and manage any potential, perceived or actual conflicts appropriately and always in accordance with the College's External Interests Policy[1]. All proposed gifts should be considered against the College's anti-bribery, Gifts and Hospitality[2] and Relationship Review policies and any other policy relating to the proposed gift. Members of the

---

[1] http://www3.imperial.ac.uk/hr/procedures/externalinterests/registerinterests

[2] https://workspace.imperial.ac.uk/secretariat/public/Policy%20on%20Gifts%20and%20Hospitality%20%28Jan%2009%29.pdf

College should not be involved in any decision from which they (or others close to them) might derive some personal benefit.

C.   **Display transparency and fairness in decision making**

The College aims to make decisions in a transparent and fair manner in accordance with its published policies and procedures, whilst honouring its obligations in relation to privacy and confidentiality. Members should conduct their activities avoiding any suggestion of bribery, fraud, corruption and other such practices which may prevent them from making decisions or being seen to make decisions in a transparent and fair manner.

SECTION 2: FACILITATING A LEADING ACADEMIC COMMUNITY

It is important that all members of the College community work together to achieve the College's academic mission and to facilitate a leading academic community. The College expects its members to:

A.   **Behave appropriately**

All members of the College community should behave in a manner which aims to enhance the reputation of the university and always in accordance with the principles set out in this Code and the College's wider policies and procedures. They should meet the highest standards of professional and academic conduct. The College has an agreed set of principles which govern the behaviour of our staff, Imperial Expectations, and staff with leadership, management or supervisory responsibility are, in particular, expected to set an example by undertaking their roles in accordance with these principles.[3] The College also has in place rigorous procedures relating to expected levels of academic conduct by students.

B.   **Play their part within the College community**

Members should strive to contribute to the functioning of the College to the best of their ability and work with others in a supportive manner.

---

[3] https://workspace.imperial.ac.uk/staffdevelopment/Public/HR/imperialexpectationsfeb2012.pdf

C. **Treat people with dignity and respect**

Members of the College community should treat others as they would like to be treated themselves, and with dignity and due respect at all times. The College will not tolerate unlawful discrimination, bullying, harassment or victimisation and will deal with such matters in accordance with the applicable policies.

D. **Promote equality of opportunity and diversity**

The College is committed to promoting equality and diversity within the College community and has a number of policies to support its aims. All members should treat other people equitably, regardless of political opinions, race, gender, disability, age, religion and belief, sexual orientation, gender identity, social economic background and personal history and should work to promote a culture free of discrimination.

E. **Uphold individuals' freedom of expression**

The College upholds the principle of freedom of expression within the law. All members should recognise the right of others to such freedoms and exercise their own freedom of expression responsibly.

F. **Research and educate responsibly**

Research and education is central to the College's work but can raise ethical issues which need careful consideration. Those involved in research should conduct their research responsibly and in accordance with the College's policies and procedures relating to research ethics. Academic staff are expected to teach to the best of their ability, be open to new ideas, and incorporate consideration of ethical issues in their teaching content when relevant.

G. **Uphold the freedoms to research**

The College fully upholds academic freedom within the law for staff and students.

SECTION 3: THIRD PARTY INTERACTIONS

The College interacts with third parties and is reliant upon them for, amongst other things, providing income to assist the College to fulfil its aims, to provide services and collaborative opportunities to the College and to facilitate knowledge transfer opportunities.

Whilst many such relationships are highly beneficial, certain relationships may be harmful for the College and may have a significant negative impact on its reputation, its ability to secure funding and its capacity to develop beneficial relationships in the future. Ethical issues may arise, for example, from the source of funding, from the partners or collaborators involved, or from what is being agreed to (in terms of output, methodology, potential use of the output, restrictions on publication or otherwise).

It is necessary to consider relationships with third parties in a holistic manner, considering the rights and interests of all parties that may be affected. In such interactions, the College expects members of the College community to:

A.   **Manage proposed relationships appropriately**

Members need to consider carefully the relationships they form with third parties and the impact that this can have on the College and its reputation before entering into them.

The College has in place a Relationship Review Policy which sets out guidelines for reviewing all relationships, with specific requirements in relation to certain types of relationship:

> ➤ Academic collaborations
>
> ➤ Commercial partnering
>
> ➤ Philanthropic income and other gifts
>
> ➤ Procurement, purchasing and supplier relationships
>
> ➤ Research funding and related relationship agreements
>
> ➤ Other income

The Relationship Review Policy also sets out guidance regarding what members of College identifying ethical issues should do, and in particular sets out clear processes for escalating ethical concerns in appropriate cases.

B.   **Admit, assess and deal with students fairly**

The College is committed to fair, rigorous and transparent student admission and assessment procedures. The College's selection criteria for admissions are fully independent of philanthropic or other support of the institution. No gift or grant will affect the academic record of any student, nor will it have a bearing on any dispute between a student and the College about his/her programme of study.

C.   **Manage resources responsibly**

Members of the College community should manage any financial, physical, human and intellectual resources within their control in a responsible manner, making sure that appropriate protections for the College and its community are in place and that their actions are in line with the College's policies, procedures and regulations (including in relation to health and safety, finance and purchasing, the protection of intellectual property, the use of the College name and brand, communications and publications, and environmental matters).

D.   **Foster strong relationships with Alumni**

SECTION 4: OTHER ETHICAL MATTERS

The College views ethical issues as extremely important and a number of its policies and procedures have ethical relevance.

The College expects members of the College community to:

A.   **Be aware of the College's ethical policies and procedures**

This Code is intended to act as a general ethical reference point, whist acknowledging that there are a number of other policies and procedures applying to the various aspects of the College's operation which have ethical relevance. Members should be familiar with the policies and procedures that apply to their work and follow them.

The Central Secretariat is developing an "Ethics Hub" listing the key policies and procedures with ethical relevance. Members of the College community are encouraged to notify any policy which they feel has ethical relevance and which is not listed in the Hub to the Central Secretariat.

B.   **Raise matters of ethical concern though the prescribed channels**

Every member of the College community has a responsibility to refer ethical concerns in accordance with this Code and the College's established policies and procedures relating to ethics listed in Appendix 1 of this document.

The Relationship Review Policy describes the methods for raising ethical issues in certain contexts. There are specific policies and procedures (for example in relation to the ethics of research processes and concerns about research misconduct) which provide for escalation of ethical issues in certain other areas. Members should refer to their Departments and the Ethics Hub for guidance.

Ethical issues that are not covered by specific policies should be escalated to a member's Head of Department or equivalent using the prescribed notification documentation which can be found on the Governance Hub webpage. Thereafter, such ethical issues will be considered in accordance with the procedures set out in section 5.

SECTION 5: ETHICAL GOVERNANCE

A.   **Escalation procedures**

Where a matter is raised in accordance with a specific policy or procedure, the escalation procedure specified in that policy shall apply.

In the event that a matter is raised with a Head of Department in accordance with the terms of this policy, and the relevant Head of Department does not feel able to resolve the matter, the Head of Department should provide a written report to the Head of Central Secretariat, setting out the issues and including (where appropriate) a recommendation as to how the matter should progress.

In appropriate cases, the **President and Provost** will then review the matter in light of the report provided and other matters brought to its attention, seeking further advice from College members and third parties as required. Any decision reached in this forum will be reported back to the Head of Department making the reference to it via the Head of Central Secretariat (and may be used in general guidance for future use).

All cases escalated will be included in the termly report to the Audit Committee.

B.   **Record keeping**

A system of sign off and record keeping should be in place so that the College and individual decision makers can demonstrate that ethical matters have been properly considered.

Heads of Department/equivalent should retain a record of all ethical issues raised with them, including:

> ➢ Copies of all ethical proforma received from members of their department

> ➢ details of how each ethical issue has been dealt with by that individual

> ➢ details (where applicable) of how that issue has been dealt with by the /**President and Provost**

> ➢ copies of all relevant reports

(Record keeping in relation to the matters dealt with under the specific procedures referred to under section 3 should take place in accordance with those policies.)

C.   **Accountability reporting**

The **College Secretary & Registrar** (in consultation with others as appropriate) is required to produce a formal report for the **Audit Committee** each term, outlining the ethical issues considered by the President and Provost /Senate and how such matters have been dealt with. Any concerns with how the Code or related policies are functioning should be included within the report.

The **Audit Committee** will report to the **Council** on the functioning of the policy as part of its annual report, highlighting specific areas where necessary.

D.   **Assistance**

Members requiring further advice or assistance on the applicability of this Code or the issues raised by it should contact the Central Secretariat.

Approved by the Council: 12 July 2013
Effective from: 1 November 2013
Revised: 23 June 2016

APPENDIX 1: LIST OF ESTABLISHED POLICIES AND PROCEDURES RELATING TO ETHICS

A. **Research policies and procedures**

 ➢ Research Integrity

 ➢ College authorisation of research proposals and related agreements

 ➢ Enterprise guidelines for ethical review of relationships

 ➢ Guidelines for proper scientific conduct in research

 ➢ Policy on the use of animals in research

 ➢ Health-related research governance framework

B. **Academic collaborations**

 ➢ Establishing Collaborative Degree Programmes: Due Diligence Checks

 ➢ Guidelines for Establishing Collaborative Programmes

C. **Financial policies and procedures**

 ➢ Acceptance of Gifts and Hospitality Policy

 ➢ Guidelines for accepting philanthropic income and other gifts

 ➢ Ordinance C1, Financial Matters Part 8, Financial Ethics and Conflict of Interest

 ➢ External Interests Policy

 ➢ National Institutes of Health Financial Conflict of Interest

 ➢ Expenses policy

 ➢ Purchasing regulations