Loughborough University Ethical Policy Framework

The Loughborough University strategy, sets out our vision for the future. It recognises that the fundamental purpose of a university is to contribute to original knowledge and understanding and to develop students intellectually as critical thinkers and as responsible members of society and citizens of the world. It also accepts that we are part of a global community and that we have a responsibility to contribute to social and economic development at regional, national and international levels.

Why we are here

- To further knowledge and understanding through internationally-recognised research
- To provide a high quality, comprehensive educational experience that prepares our graduates for their future lives and the global workplace
- To influence the economic and social development of individuals, businesses, the professions and communities
- To shape national and international policy and practice

In delivering our strategy, we will adhere to a number of values which will influence the way we deliver our goals. We will:

- Respect each other and celebrate our diversity
- Recognise and reward excellence in our staff for their contribution and commitment
- Be inclusive and value the views of our staff, students, alumni and partners
- Respect the communities and environments in which we operate
- Work together as a team with professionalism and integrity
- Take pride in being the very best we can be

Upholding the mission and values of the institution is of the utmost importance to our long-term success and sustainability. In doing so, it is vital that, as individuals and as a community, we adhere to and promote the ethical principles set out in this framework.

Professor Robert Allison
Vice-Chancellor

1: Introduction

Preamble

The University is an independent academic institution that exists for the creation, transmission and dissemination of knowledge for the social and economic enrichment of society. We must be committed to fulfilling that purpose only in ways that comply with broad obligations to social responsibility, including the protection of human rights, civil liberties and the natural environment, with a special institutional commitment to the promotion of health and well-being. Integral to this commitment to social responsibility are the adoption of high ethical standards across every part of our activities. This framework provides a comprehensive statement of our expectations in relation to organisational and individual ethical behaviour, and a structure that supports informed decision-making when specific ethical issues arise in the course of the University's business.

How is the framework used and to whom does it apply?

We recognise the distinction between legal requirements (see Appendix 1) and ethical considerations, and aim to fulfil our obligations to both. No attempt is made in this framework to address or anticipate all possible ethical dilemmas. Nor will collaboration with any particular, legally constituted organisation or sector be ruled out simply to avoid confronting challenging ethical issues. Instead, the framework offers wide ranging guidance to all members of our university community on how to act with integrity, good conscience and good judgement at all times. Such members include our staff, including staff of our subsidiary companies, students and lay members of Council as well as visiting staff and students. Our ethical principles are summarised in section 2. Ethical checklists are available to help identify issues where further scrutiny is required (see Appendix 2).

How is the framework structured?

The framework is structured to reflect its essential connection to the university strategy and structure and considers each area of University activity in turn. When ethical issues arise in any one area of our activity, we also aim to consider any implications across all other areas of our activity. Each area is the responsibility of a named senior member of staff of the University (see Appendix 3).
Detailed Codes of Practice and further guidance in specific areas are set in context and the remit of the Ethics Committee is defined.

How can unethical behaviour be challenged?

Any member of the University community may challenge the institution if in good faith they feel that we have fallen short of the standards set out in this framework in relation to organisational or individual ethical behaviour. Initially, this should be discussed locally, for example with a tutor, supervisor, line manager, department / section head or Dean, but if a resolution cannot be found then contact should be made with the responsible person for the area of activity (see Appendix 3) in which the challenge is made. If a resolution still cannot be found then this responsible person will ensure that the matter is passed to the Ethics Committee for resolution. Retaliation or retribution against any person making such a challenge will not be tolerated and shall attract disciplinary action.

Who is responsible for the framework and how often is it reviewed?

This framework was produced after consultation across the University and was first approved by the University Council on 14 July 2011. The Ethics Committee is responsible for updates to this framework which is reviewed annually.

2: Loughborough University Ethical Principles

As active members of an international academic community, we are fundamentally committed to:

• the creation, transmission and dissemination of knowledge for the social and economic enrichment of society,
• the Nolan principles of public life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership,
• accepting our social, economic and environmental responsibilities and contributing to the wider goal of sustainable development.
• the protection of equity, human rights and civil liberties around the world, and
• supporting the academic freedom to further knowledge and debate, within UK law.

As the representatives of a modern, progressive institution, we are also committed to:

• excellence in all our activities,
• good governance and collegiate, transparent leadership,
• safe working practices
• fair, rigorous and transparent processes and practice,
• encouraging social mobility and widening participation, and
• regarding legal compliance as a minimum expectation but it may not be a sufficient response to an ethical challenge,

but we will not tolerate

• initiation of or collusion in harmful acts,
• giving, offering, receiving or requesting improper inducements to influence decisions affecting the interests of the University, or
• retaliation or retribution against any person who in good faith challenges our ethical position.

Furthermore, as members of the Loughborough University community, we are committed to:

• Fostering a collegial community characterised by inclusivity, equality of opportunity, the valuing of diversity, mutual trust, respect for personal dignity and the promotion of unity across nations,
• respect for our diverse local community,
• listening to all members of the university community, past and present,
• the promotion of health and well-being,
• valuing participation, dedication and honest endeavour, and
• celebrating ever greater achievement and success fairly gained.
• demonstrating courage and consistency and transparency when facing challenging ethical dilemmas,
• choosing partners who share our ethical commitments, and
• ensuring that all members of the university community embrace and promote these ethical principles.

3: Research

Loughborough is a research intensive institution. We undertake, promote and disseminate research of the very highest international quality. In particular, we deliver 'research that matters', in its impact on public policy, the professions, business and industry, as well as on the development of knowledge and understanding.

The leaders of our research projects and programmes, on all scales, are accountable for ensuring adherence to this framework in respect of the nature, conduct, dissemination and foreseeable end-use of research, and the behaviour of researchers. Acting with integrity, openness and honesty, these leaders are expected to make objective research decisions and, where difficult ethical issues are encountered, demonstrate courage and consistency in those decisions with the backing of the institution (through the Loughborough University Ethics Committee) as a whole. We will seek research partners who share our ethical principles, as demonstrated through their own ethical behaviour and commitment to relevant international ethical principles (for example, the WMA Declaration of Helsinki on Ethical Principles for Medical Research Involving Human Subjects). Research funding proposals will be subject to ethical scrutiny as part of the funder assessment process.

Researchers must work with honesty, accuracy and rigour, and accept their professional duty to understand the ethical implications of their studies, especially those involving human participants, human tissues, research within the NHS, animals, risk to the environment and the use of sensitive data. All researchers should declare any real or potential conflicts of interest at the earliest opportunity, including those associated with publication. In all publications, authorship must be fairly attributed in accordance with paragraph 3.15.4-3.15.6 of the UKRIO Code of Practice (http://www.ukrio.org/publications/code-of-practice-for-research/) Research misconduct, for example plagiarism or the falsification of results, will be regarded as a serious disciplinary offence.

The following Codes of Practice are available

The ethical quick test for research and enterprise projects (attached Appendix 4)

[Code of Practice on Investigations Involving Human Participants](#)

[Health and Safety Policy on Blood Borne Viruses](#)

[Health and Safety Policy on Pathogens (Excluding Blood Borne Viruses)](#)

[Research Misconduct Policy](#)

[Whistle blowing Policy & Procedure](#)

[Human Tissue Authority](#)

[NHS Health Research Authority](#)

The following guidance on research within the NHS is available: [NHS Research](#)

The UK Research Integrity Office [Code of Practice for Research](#) provides general principles

and standards for good practice in research.

The following detailed guidance for investigators is available

[University HTA Licence Compliance Quality Manual](#)

[Compliance with Data Protection Requirements](#)

[Conducting Interviews Off-Campus and Working Alone](#)

[Data Collection and Storage](#)

[Exposure to Hazardous Substances](#)

[Exposure to Ionising Radiation](#)

[Making Payments to Participants](#)

Studies Using Pre-Existing Data

Use of Pharmaceutical Drugs

Using Electronic Methods or Social Media for Research

Working with Children and Young People

Research with Military Applications (see appendix 7)

An archive of approved ethics proposals for research involving human participants, together with application forms and templates, are available from the Ethical Approvals (Human Participants) sub-committee.

4: Learning and Teaching

At Loughborough, we are committed to research-informed teaching and to developing programmes of study that build on our exceptional reputation for effective collaboration with external partners in business, industry, the public sector and the professions. Our defining characteristics are a student-centred ethos and an outstanding national reputation for high quality teaching and student learning. Academic staff have the primary responsibility for providing diverse opportunities for all students to develop qualities of critical enquiry and independent learning within a supportive and intellectually stimulating learning environment. Crucially, we will listen to their needs and encourage their participation in enhancing the quality of learning and teaching.

Our recruitment and admissions process will be transparent, fair and explicit. Selection procedures will be followed courteously and expeditiously. Information concerning applicants will remain confidential. The University has a good record on widening access, in line with national policy objectives, and is committed to engaging in a range of activities in support of outreach and fair access.

Across the many facets of the relationships between learners and teachers, all parties shall act with integrity and honesty and be willing to act selflessly. All students should have access to personal tutors to ensure that appropriate advice and support is provided. Module design will consider the needs of all students and assessment procedures will be fair, rigorous and transparent. Academic misconduct, such as taking prohibited materials into examination halls and plagiarism, will not be tolerated.

The ethical principles associated with research apply equally to research work associated with taught programmes. In this case, responsible examiners / project supervisors are accountable for the nature and conduct of the research, the end-use of its findings, the behaviour of students and the choice of partners. Module / project definitions should involve students in a formal ethical scrutiny stage with responsible examiners/supervisors ensuring escalation as appropriate where specific approvals are deemed necessary. Similar considerations apply to placements forming an integral part of Loughborough degree programmes. The health and safety of students on placement is of paramount concern.

The institution has procedures to listen and respond to student complaints and appeals about academic matters. These are designed to ensure that students can raise matters of genuine concern without fear of disadvantage and in the knowledge that confidentiality will be respected.

The following documentation is available:

The Academic Quality Procedures Handbook

Student Handbook

5: Enterprise

Enterprise at Loughborough University is the term used to describe academic engagement with business, public and voluntary organisations to create social, cultural and economic impact through knowledge exchange. Enterprise is one of our four strategic themes, alongside teaching and learning, research and sport.

Enterprise initiatives include the formation of partnerships with business, public and voluntary organisations, the development of our Science and Enterprise Park, the nurturing of graduate start-up and University spin-out companies, and the creation of impact from our research base through a variety of project mechanisms. The Pro-Vice Chancellor (Enterprise) is accountable for ensuring adherence to this framework in respect of such initiatives. Acting with integrity, openness and honesty, the PVC(E) is expected to ensure that objective decisions are made concerning the choice of partners and the formation of new businesses and, where difficult ethical issues are encountered, demonstrate courage and consistency in those decisions with the backing of the institution as a whole. We will seek partners who share our ethical principles and respect our institutional values, as demonstrated through their own business practices. Through our shareholdings, we will encourage our subsidiary and spin-out companies to reflect our ethical principles in their own governance processes. For external organisations based on our campus, a commitment to the ethical principles in section 2 is a condition of tenancy.

In commercial activities, such as consultancy or IP exploitation, agreements must reward consultants and inventors fairly and respect the principles of academic freedom. Staff and students must give informed consent to confidentiality clauses where these are deemed necessary by the institution and its business partners but every effort will be made to ensure that such dealings are as transparent and accountable as possible. The process for approval of commercial activities shall be subject to ethical scrutiny.

Each year, staff and members of the governing body must declare and provide details of any substantial involvement with an external organisation to ensure transparency in the University's current and future business relationships.

The following guidance is available:

The ethical quick test for research and enterprise projects (attached Appendix 4)

6: Sport

The University is distinguished by a long history of excellence in sports performance, sports sciences, technology and engineering, and the scale and range of activity in these domains. Our reputation as the UK's premier university for sport inspires us to act, across all activities, according to ideals which place fundamental value on participation, dedication and honest endeavour, while celebrating ever greater achievement, success fairly gained and unity across nations.

To demonstrate its unequivocal commitment to 'Clean Sport', the University, continually

uses education as the best form of prevention on Campus. Collaborative work with UK Anti- Doping (UKAD) has further expanded the team of onsite accredited anti-doping trainers who share anti-doping knowledge with coaches, teams and athletes. Loughborough students have also been selected to work as ambassadors for Clean Sport.

Loughborough contracts UKAD to deliver a 'no notice' testing programme within its performance sport squads. It is also one of only a handful universities in the UK committed to implementing UKAD's 'Elite Level' on the National University Accreditation Scheme.

The following Codes of Practice are available:

[Loughborough Sport Clean Sport Commitment](#)

[Loughborough Sport Anti-Doping Policy](#)

[Loughborough Physiology Lab Code of Conduct](#)

[UKSCA Code of Conduct](#)

[BASES Code of Conduct](#)

7: The Arts

Through a programme of arts based activities we support the creative life of students while they are at university. Students are given the opportunity to learn creative skills and to engage with issues and ideas outside of their academic study. It provides an environment where there is an opportunity to meet students from different cultures and gain a breadth of knowledge that will support their life long learning. This commitment to the arts exemplifies our broader commitment to delivering a rich academic experience, beyond the economic imperatives increasingly associated with today's university education.

For further information see: www.lboro.ac.uk/arts

8: The Loughborough Student Experience

The Loughborough Student Experience has always been a distinctive feature of the University. It is founded on a strong culture of student involvement in an energetic but caring community, characterised by high achievement, fun and a high degree of self-organisation. Effective partnership between Loughborough Students' Union, academic departments and support services has been central to this success, together with dynamic Hall communities and the strength of student sport.

The University attaches great importance to the student experience. We aim to provide an environment free from unfair discrimination and characterised by mutual trust, respect for personal dignity, inclusivity and equality of opportunity. This spans every phase of the student experience, from recruitment to graduation, and acknowledges our responsibilities towards disabled students. No student should be subjected to less favourable treatment on grounds of race, colour, nationality, ethnic origin, gender, gender identity (transsexuality), marital or civil partnership status, disability, religious or political beliefs, age, sexual orientation, pregnancy or maternity status, social or economic background.

Students must comply with the institution's rules and regulations, as set out in the student handbook which covers disciplinary and complaints procedures. We expect students to maintain high standards of personal and academic behaviour during their studies and we will not tolerate any form of harassment (including bullying) of, or by, our students. Students are expected to be open, honest and courteous with staff, with each other and with other members of the university as well as the local community. Academic freedom and freedom of speech are fundamental characteristics of the university environment. Debate, challenge and dissent are not only permitted but expected, and controversial ideas are likely to be advanced. Working with the Students' Union, we must ensure, however, that aberrant behaviour is challenged and communicated to the police where appropriate. At the same time, we do not seek to impede the exercise of fundamental freedoms, in particular freedom of speech, through additional censorship, surveillance or invasion of privacy.

Accepting our duty of care, we will ensure the provision of appropriate support mechanisms for students including academic supervision, counselling, disability and mental-health related support, career education guidance and financial support for cases of genuine hardship. We will also encourage participation in extra-curricular activity, particularly through academic departments, Halls and the Students' Union. We will empower students to take responsibility for their personal and professional development, enhancing their employability skills through, the breadth of opportunities provided. In these ways and in combination with high quality taught programmes, the University aims to

equip its graduates for the challenging opportunities of a rapidly changing global environment.

The following Codes of Practice are

available: [Harassment and Bullying](#)

[Sexual Assault and Sexual Harassment Policy](#)

[External Speaker Policy](#)

[Loughborough University Prevent Policy](#)

The following detailed guidance is available:

[The Student Charter](#)

[Single Equality Scheme](#)

[Guidelines for Good Practice to Support Mature Students](#)

[Student Handbook](#)

[Student Handbook: Equal Opportunities](#)

[Student Handbook: Discipline](#)

[Student Handbook: Complaints](#)

[Alcohol free zone on Campus](#)

9. Sustainability and Social Responsibility (S&SR) at LU

The University is committed to acting in a socially responsible way that maximises its positive impact and minimises its negative impact on society and the communities in which it is based. This is reflected in the University's strategy Building Excellence which states that "we will embed sustainability and social responsibility into all of our processes, operations and developments" and also that we "will work closely with local partners to enhance the social, cultural and economic wellbeing of the communities and regions in which we reside".

In terms of sustainability, the University takes its responsibility for the environment seriously, and understands the need to respond to the challenges we face globally around issues such as climate change, human wellbeing, food, water supply and energy security. Loughborough seeks to respond to these opportunities by leading in environmental sustainability, building on the work of our research and enterprise activities and aspiring to make the campus a living laboratory demonstrating operationally our aim to develop a sustainable campus. Our commitment to sustainability also has an impact in teaching and learning where students are increasingly interested in courses which include sustainability and are seeking to attend HEIs which can demonstrate their commitment to the

environment

Details of our sustainability response are available here:

http://www.lboro.ac.uk/services/sustainability/

Our response to the social responsibility agenda has wide-reaching implications for how staff and students are respected and supported:- for relationships with local communities: and for how we undertake our academic and business activities There are also opportunities to embed research and enterprise and a strong link to the curriculum where, within the key aim Educating for Success, the University states that "we will develop our students as individuals, enhancing their capabilities as creative, confident and adaptable 21st Century citizens who will make a significant contribution to global society". The Students Union is central to our social responsibility response, in particular through the work of Action and RAG.

Details of our approach and activities in respect of Social Responsibility can be found here: http://www.lboro.ac.uk/services/community/

10: Human Resource Management

The University values all of its staff, recognising that its reputation is dependent on the commitment and excellence of its staff. Led by the Director of Human Resources, we are committed to developing a demonstrably fair and supportive environment, which is concerned with employee wellbeing and which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, colour, nationality, ethnic origin, gender, gender identity (transsexuality), marital or civil partnership status, disability, religious or political beliefs, age, sexual orientation, pregnancy or maternity status, social or economic background, or offending background. All staff hold responsibility for upholding the University's equality and diversity policies. Equality of opportunity is embedded in all of our processes eg: the recruitment and selection of staff, training, promotion, performance and development review, induction, probation, and communication. We endeavour to treat people fairly on the basis of individual need and we will value the diversity in the workforce we build. All staff are encouraged to develop relevant skills and progress their careers. Training and development opportunities are readily available to facilitate this.

Staff must comply with the University's policies and procedures. In particular, when dealing with students, suppliers, business partners, government officials or other parties, no member of staff may give, offer, receive or request money or anything else of value, either directly or indirectly through connected parties, which could be construed as being intended as a bribe. Where an act of bribery is suspected, staff are obliged to take preventative action. When representing the University externally, staff should act courteously and respectfully at all times, acknowledging specific local traditions and cultures in dealings overseas. We will not tolerate sexual, physical or mental harassment (including bullying) of, or by, our staff. Confidentiality will be respected. But conflicts of interest must be disclosed. Staff are expected to be open, honest and courteous with students, with each other, and with all members of the University community.

Codes of Practice:

Harassment and Bullying

Equal Opportunities

Research Staff Employment

Disability

Policies and detailed guidance:

Anti-Bribery Policy

Conditions of Service

Recruitment Guide

Equal Pay Policy

Employment of Ex-Offenders

Equality & Diversity Statement

Whistleblowing Policy

11: Financial Sustainability

The University holds and strives to maintain a secure and stable financial position, characterised by returning the operating surpluses recommended by Council. By generating funding from a wider range of sources, we seek to retain the capacity to invest in staff and facilities in areas central to our academic strategies in the face of major changes in the financial base for UK Higher Education.

Led by the Director of Finance, the university executive is accountable for the setting of budgets and policies and the implementation of procedures that conform to the highest standards in corporate governance. For example, procurement policies and procedures will deliver value for money and encourage fair and equitable, socially responsible and environmentally sustainable behaviour while an ethical investment policy will set out guiding principles for our investments together with a specific listing of current investments. Individual budget holders are accountable for exerting appropriate financial controls in their areas of responsibilities and all members of the university community must play their part in ensuring our operations are cost effective.

Our efforts to generate income and attract resource generally, whether in collaboration or competition with other HE institutions or other bodies, will be characterised by our integrity and honesty. We seek suppliers, contractors and customers who share our ethical principles and respect our institutional values, as demonstrated through their own business practices and our relationships with these partners will be based on honesty, fairness and mutual trust, including adherence to agreed terms.

The following detailed guidance is available:

Ethical Investment Policy

Travel, Expenses and Benefits Policy

Sustainable Procurement Policy

12: Marketing and Communications

Our central marketing team undertakes activities that raise the University's profile with its external and internal stakeholders, inspire potential students, connect with alumni and competitively position the University nationally and internationally. We endeavour to ensure that all marketing materials are accurate at the time of publication, accessible and not misleading, and provide all the University's stakeholders with instructive information that helps them to make informed decisions and/or engage with the University. We endeavour to communicate policies, achievements and prospects honestly within and outside our University community.

The following detailed guidance is available:

Writing compelling copy to engage your audience

Advice on blogging, email marketing, web design and other online channels

Market research resources from applicant survey results to sector overviews

Advice on engaging with the media and other key stakeholder groups

Social media best practice

Trends in HE and marketing

Policy on Commissioned Advertising

13: Commercial Services

The University engages in commercial and sponsorship activity to develop sources of revenue which maximise the University's facilities and expertise (including its commercial skills) in ways which are consistent with, and support, its core objectives as an academic institution. All profits are re-invested into the University. Led by the Chief Operating Officer, adherence to this framework is expected from all staff engaged in the delivery of commercial services. We will seek business partners who share our ethical principles and respect our institutional values, as demonstrated through their own business practices.

In the context of the University's ethical principles, staff considering a sponsorship agreement should consider:

• The suitability and reputation of the organisation according to the criteria outlined in the University's ethical principles.

• How a sponsorship agreement will be perceived by members of the University's community.

• How a sponsorship agreement will be perceived externally, for example in the local community or within Higher Education, or in the wider public domain.

14: Philanthropic gifts

Development and Alumni Relations Office is charged with building relationships with alumni and friends and soliciting donations to support the University's strategy. In the first instance, all philanthropic gifts that the Institution applies for or is offered are vetted by the Director of Philanthropy to ensure basic compliance with law and with our ethical principles. The Director of DARO has the authority to approve gifts below £50k. Above £50k, whether as a single gift or a combination of gifts, the acceptance of funding from a single source is considered by the Ethics Committee or a quorate sub-group of the Committee.

When considering the ethical nature of a gift the Loughborough University Ethical Policy Framework's Ethical Principles and Checklist should be referred to, and these points should be of particular focus:
The origin of the gift – where is the money or item coming from?
The nature of the donor – are they an individual or organisation of integrity and good reputation?
The legal and financial context of the gift – is the gift legal?
The purpose of the gift – has the benefitting campaign, project or cause obtained ethical approval, or is it ethically sound, are there any conditions attached to the gift?

The following Code of Practice is available:

Ethical Approval of Gifts (Appendix 6)

15: Estate

The University is committed to acting in a socially responsible way that aims to maximises it's positive impact and minimises its negative impact on society and the communities in which it is based.

Over the last 5 years the University has made significant progress in embedding environmental Sustainability across its operations. It also has a measurable track record of success in delivering on Social Responsibility. Our ongoing vision is to demonstrate a consistent and meaningful engagement with sustainability through our capital development programme, campus operations and academic activities and embed sustainability and social responsibility in our school and services management processes.

The following detailed guidance is

available: [Managing our environmental impacts](#)

16: Information Services

High quality, fit-for-purpose information services are required to support and underpin the work of a knowledge-based organisation such as Loughborough University. For this reason, we seek to promote and facilitate the proper and extensive use of Information Technology while ensuring responsible and legal use of the technologies and facilities made available to students, staff and partners of the University.

The following detailed guidance is available: IT Acceptable Use Policy

17: Ethics Committee

The Ethics Committee serves to advise Council on ethical matters arising in the conduct of the University's business. It is a Joint Committee of Senate and Council. Its terms of reference, constitution and membership and FAQs are available here:

http://www.lboro.ac.uk/committees/ethics/meetings/

Its Sub-Committees are: the Ethical Approval (Human Participants) Sub-Committee and Human Tissue Act Licence Sub-Committee.

18: Principal Sources of Information

A number of sources of information have informed the development of this framework. These have included:
- The Council for Industry and Higher Education: Ethics Matters – Managing Ethical Issues in Higher Education.

- The Council for Industry and Higher Education: Reviewing the effectiveness of 'Ethics Matters – Managing Ethical Issues in Higher Education'.

- Royal Academy of Engineering Statement of Ethical Principles.

- OECD Guidelines for Multinational Enterprises.

19: Further Information

If your concerns have not been fully addressed by this Ethical Policy Framework, its Codes of Practice or the additional guidance provided, your next steps should be to:
• Raise the issue locally and in confidence with, for example, your tutor, supervisor, line manager or Dean of School.

• If resolution cannot be reached, you or your representative (as above) should refer the case to the person responsible for the area of activity in which the issue falls (see Appendix 3).

If resolution still cannot be reached, the person responsible for the relevant area of activity should raise the matter with the Secretary of the Ethics Committee who will pass it to the Chair for consideration.

Appendix 1: Legal Requirements

University guidance is available covering the following

areas: Freedom of Information

Data protection

Appendix 2: Ethical Checklists

For some actions, e.g. approval of experiments with human participants, dedicated checklists have already been formulated and should be used. For other actions, dedicated checklists should be developed over time, assisted by the generic checklists. A Research quick test check list has been formulated against which to consider all research activity including research funding proposals, to be completed independently by the principal investigator and the research office. For consultancy, a dedicated checklist might be completed by the consultant and the LUEL consultancy manager while, for IP exploitation, the checklist might be completed by the inventor and the Head of IP Commercialisation.

Ethical issues, however, will arise from such diverse activities that in many cases a dedicated checklist will not be available. The quick test is intended to prompt a reviewer or challenger to begin to consider the action in question in simple terms. The generic ethical checklist prompts more detailed consideration of ethical issues

'Yes' responses allow the action to proceed through the ethical approval process straightforwardly. 'No' or 'Not sure' responses should, in the first instance, promote amendments where possible and acceptable, or further investigation before re-submission. Remaining 'No' and 'Not sure' responses then form the basis of a submission either for local resolution or for the attention of the person responsible for the area of activity.

It is essential that reviewers consider the implications of an action in all areas of the University's business, not just in the area within which the action arises. For example, how would a particular research project be viewed by potential applicants for taught programmes?

The ethical quick test

Question	yes	no	Not sure	Comments
Is the action legal?				
Does the University already have a dedicated procedure for approval of such actions?				
Does the action adhere without question to the ethical principles in section 2 of the framework?				
Is the action free from obvious conflicts with relevant sections of the ethical framework?				
Will I be proud of the action and its outcomes?				
Will I feel comfortable about the action and its outcomes?				
Will the action look acceptable in the media?				
Will the action look acceptable to my colleagues, friends or family?				
Does the action involve animal testing? If the answer to this question is yes, then guidance from the Research Office should be sought in the first instance				
Does the action have military applications?				

The generic ethical checklists

This generic checklist is based on strategy areas and the statement of ethical principles

In which areas of the University's business are there ethical or other implications arising from the action?	Yes	No	Not sure	Comments
Research				
Learning and Teaching				
Enterprise				
Sport				
The Arts				
The Loughborough student experience				
Social Impact and Engagement				
Human Resource Management				
Financial Sustainability				
Marketing and Communications				
Commercial Services				
Advancement and Fundraising				
Estate				
Information Services				

Is the action consistent with our institutional	Yes	No	Not sure	Comments
the creation, transmission and dissemination of knowledge for the social and economic enrichment of society?				
the seven overarching ethical principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership?				
accepting our social, economic and environmental responsibilities and contributing to the wider goal of sustainable development?				
the protection of equity, human rights and civil liberties* around the world?				
supporting the academic freedom to further knowledge and debate, within UK law?				
excellence in all our activities?				
good governance and collegiate, transparent leadership?				
safe working practices?				
fair, rigorous and transparent processes and practice?				

encouraging social mobility and widening participation?				

Is the action consistent with our institutional commitments to:	Yes	No	Not sure	Comments
regarding legal compliance as a minimum expectation but not as a sufficient response to an ethical challenge?				
intolerance to initiation or collusion in harmful acts?				
intolerance to improper inducements to influence decisions affecting the interests of the University?				
intolerance to retaliation or retribution against any person who in good faith challenges our ethical position?				
fostering a collegial community characterised by inclusivity, equality of opportunity, the valuing of diversity, mutual trust, respect for personal dignity and the promotion of unity across nations?				
respect for our diverse local community?				
listening to all members of the university community, past and present?				
the promotion of health and well-being?				

valuing participation, dedication and honest endeavour?				
celebrating ever greater achievement and success fairly gained?				

* Civil liberties (http://legal-dictionary.thefreedictionary.com/civil+liberties)

The rights or freedoms given to the people by the First Amendment to the [US] Constitution, by common law, or legislation, allowing the individual to be free to speak, think, assemble, organise, worship, or petition without government (or even private) interference or restraints.

What rights does the Human Rights Act protect? (http://www.liberty-human-rights.org.uk/human-rights/human-rights/the-human-rights-act/index.php)

• The right to life – protects your life, by law. The state is required to investigate suspicious deaths and deaths in custody.

• The prohibition of torture and inhuman treatment – you should never be tortured or treated in an inhuman or degrading way, no matter what the situation.

• Protection against slavery and forced labour – you should not be treated like a slave or subjected to forced labour.

• The right to liberty and freedom – you have the right to be free and the state can only imprison you with very good reason – for example, if you are convicted of a crime.

• The right to a fair trial and no punishment without law - you are innocent until proven guilty. If accused of a crime, you have the right to hear the evidence against you, in a court of law.

• Respect for privacy and family life and the right to marry – protects against unnecessary surveillance or intrusion into your life. You have the right to marry and raise a family.

• Freedom of thought, religion and belief – you can believe what you like and practise your religion or beliefs.

• Free speech and peaceful protest – you have a right to speak freely and join with others peacefully, to express your views.

• No discrimination – everyone's rights are equal. You should not be treated unfairly – because, for example, of your gender, race, sexuality, religion or age.

• Protection of property, the right to an education and the right to free elections – protects against state interference with your possessions; means that no child can be denied an education and that elections must be free and fair.

Appendix 3: Responsible Persons

Strategy Area	Responsible Post	Current Post-holder
Research	PVC(R)	Steve Rothberg
Learning and Teaching	PVC(T)	Morag Bell
Enterprise	PVC(E)	Steve Rothberg
Sport	Director of Sport	Peter Keen
The Arts	Director of Arts	Nick Slater
The Loughborough Student Experience	Director of Student Services	Manuel Alonso
Social Responsibility	Chief Operating Officer	Richard Taylor
Human Resource Management	Director of Human Resources	Rob Allan
Financial Sustainability	Director of Finance	Andy Stephens
Marketing and Communications	Director of Marketing and Communications	Emma Leech
Commercial Services	Chief Operating Officer	Richard Taylor
Advancement and Fundraising	Director of Development and Alumni Relations	Sue Sargent
Estate	Director of Facilities Management	David Fulford
Information Services	Director of IT Services	Vipin Ahlawat

Remit for the Responsible Person:

• To own the relevant section of this framework, ensuring that guidance provided,

including linked documents, is accurate and sufficient. When the formulation of additional guidance is necessary, to recommend such action to the Ethics Committee.

To guide the review, modification and production of Codes of Practice and guidance documents within their area of responsibility as requested by Ethics Committee.

To receive ethical issues relating to their area of the business of the University which members of the university community have not been able to resolve locally.

Where such issues still cannot be resolved, to ensure that the issue is considered within the process laid out in this framework.

The ethical quick test for research and enterprise projects

Completion of the RX2 for research and enterprise projects or approval for consultancy projects through Loughborough University Enterprises Limited (LUEL) requires completion of an ethical approval. It is the responsibility of the Principal Investigator (or equivalent) to ensure that any approval required is obtained.

The first stage is to consider whether aspects of the project fall under the remit of specific Ethical Approval Sub-committees in which case submissions should be made to the appropriate sub-committees as follows:

Aspect of project:	Sub-committee
experiments with human participants	Ethical Advisory (Human Participants)
activity falling under the Human Tissues Act	Human Tissue Act Licence sub committee
funding by philanthropic gifts	Ethical Advisory (Gifts)
Military Applications	Ethics Committee

For projects in which ethical aspects fall partially or wholly outside the remit of these sub-committees, the Principal Investigator must also complete the ethical quick test and provide a copy to the Dean of School who is responsible for confirming that all necessary ethical approvals are in place or are in process.

The quick test asks questions in a way that are intended to be thought-provoking. To pass the test, all responses must be 'yes'. Failing the quick test does not imply a refusal by the University to undertake the project. If a project fails the quick test then this means that further ethical scrutiny is required. This process requires completion of the generic ethical checklist to be found in the Ethical Policy Framework which must then be forwarded together with the project proposal to the PVC(R) or PVC(E), for research or enterprise (including LUEL) projects respectively.

Completion of the quick test requires familiarity with the University's statement of ethical principles which can be found in the Ethical Policy Framework where extensive further details are also available.

Question	yes	no	Not sure	Comments
Have you made all necessary submissions concerning aspects of the research / enterprise project that fall under the remit of existing ethical approval sub-committees?				
Are the research / enterprise project and its outcomes clearly legal?				
Does the research / enterprise project adhere without question to the ethical principles in section 2 of the framework?				
Will I be proud of the project and its outcomes?				
Will I feel comfortable about the project activities and their consequences?				
Will the project activities and their consequences look acceptable to my colleagues, friends or family?				
Will the project activities and their consequences look acceptable in the wider public domain?				
Does the project involve animal testing? If the answer to this question is yes, then guidance from the Research Office should be sought in the first instance				
Does the research/enterprise activity have military applications?				

Loughborough University

Code of Practice for the Acceptance of Gifts

1.   Scope

This Code of Practice applies to **all** philanthropic gifts to the University regardless of whether the donation is secured by the Development and Alumni Relations Office (DARO) or not. It ensures that philanthropic gift acceptance procedures are transparent and accessible to all members of the University community.

2.   What is a Philanthropic Gift?

Philanthropic gifts, typically gifts of money and artefacts, are intended to assist the University to pursue its strategic aims without bringing material reward to the donor. While philanthropic giving is generally associated with cash gifts, it may also take other forms such as the donation of shares, equipment or works of art.

Philanthropic giving should not be confused with sponsorship which is a cash and/or in-kind fee paid in return for access to the exploitable commercial potential associated with the beneficiary.

3.   Fundraising campaigns and projects

Donors may choose to contribute to a specific campaign, to predefined projects, to a cause of their choice which aligns with the University's strategic aims, or may state that the University should allocate their gift where the need is greatest (unrestricted).

All campaigns, projects and causes supported by philanthropic gifts within the University are subject to ethical review and must follow the ethical approval process which reflects it potential value to the University:

>£50K	•DARO provide a report to enable the Ethics Committee or a quorate sub-group of the Committee to approve / refuse the campaign or project
<£50K	•Director of DARO makes a decision based on the ethical checklist

Operations Committee must also approve fundraising campaigns and projects which have resource implications. It is the responsibility of the Director of DARO to ensure that relevant committee approvals are secured during the process of identifying fundraising campaigns and projects.

4.   How should discussion of philanthropic gifts be conducted?

All discussions relating to philanthropic gifts should be supported by the Development and Alumni Relations Office (DARO). Discussions originating outside of DARO should involve DARO staff at the earliest opportunity. To facilitate these discussions, DARO will research and review information that is
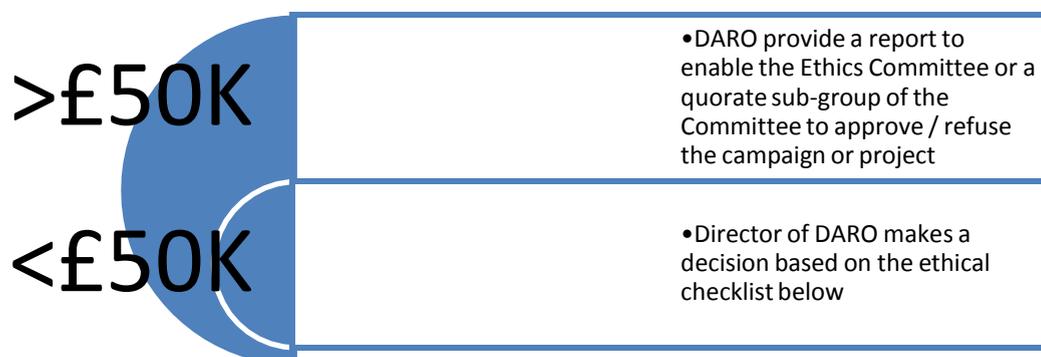
relevant to the gift, assist in the drafting of an appropriate gift agreement and prepare the information required to obtain gift acceptance approval. Sometimes philanthropic gifts to support research are processed via the Research Office, in these cases the Research Office must follow the gift approval procedures detailed below calling upon the support of DARO as appropriate.

5.   What is the process for accepting a philanthropic gift?

All philanthropic gifts are initially vetted by the Director of DARO to ensure both compliance with applicable laws and alignment with University strategy. Acceptance of gifts outside of approved campaigns/projects/causes requires both ethical approval and the agreement of the relevant School Dean or Pro-Vice Chancellor. Where a gift has implications for staff, space or revenue funding, additional approval is required from Operations Committee. The Director of DARO is responsible for deciding when a gift should be referred in this way.

To assist in the ethical assessment of philanthropic gifts fundraisers and members of the Ethics Committee should refer to the Loughborough University Ethical Policy Framework's Ethical Principles and Checklist described in 7. below.

Depending on the value of a gift (or the cumulative value of gifts from the same donor) a different gift approval process will be followed:

>£50K	• DARO provide a report to enable the Ethics Committee or a quorate sub-group of the Committee to approve / refuse the campaign or project
<£50K	• Director of DARO makes a decision based on the ethical checklist below

For gifts (or cumulative gifts) in excess of £50K Ethics Committee or a quorate sub-group of the Committee will received a due diligence report from the Director of DARO setting out the nature, source and purpose of the gift and highlighting any areas which might merit particular scrutiny. To assist in the ethical assessment of philanthropic gifts fundraisers and members of the Ethics Committee should refer to the Loughborough University Ethical Policy Framework's Ethical Principles and Checklist described in 7. below. If the gift is refused but further information to support its case is available it may be resubmitted for reconsideration pending a final decision. In exceptional cases, where specific reasons exist the Ethics Committee should refer the decision to University Council.

For gifts (or cumulative gifts) under £50K the Director of DARO should approve or reject the gift based on due diligence research conducted by DARO and with reference to the checklist outlined in 7. below.

Where the Director of DARO or members of the Ethics Committee have a conflict of interest this must be declared and the individual must abstain from the decision making process. For gifts under £50K, if the conflict of interest lies with the Director of DARO then the gift concerned should be considered by the Deputy Director of DARO.

6.   Ethics Committee Terms of Reference in relation to philanthropic gifts and campaigns

The Ethics Committee operates under the following terms of reference Committee <hyperlink to the TOR for the full University Ethics Committee>. In relation to philanthropic gifts or campaigns its remit is:

- To make recommendations to and to receive recommendations for the development of codes of practice and guidance concerned with the acceptance of philanthropic gifts.
- To approve or decline gifts valued in excess of £50K based on information received from the
Director of DARO.
- To report decisions relating to the acceptance or rejection of gifts to
University Council.
- To give ethical approval to fundraising campaigns, projects and causes valued in excess of £50K.
- After assessment against the ethical checklist, to recommend donors of widely acknowledged integrity and impeccable reputation for inclusion on an Approved Donor list.

At times, it may not be possible for the full Ethics Committee to meet to consider a donor or gift. In these instances due diligence information will be shared with a quorate sub-group of the Committee who will have the delegated authority to approve or reject donors or gifts. This sub-group should consist of four members of the full Ethics Committee of which one must be the Chair or Deputy Chair and one must be a lay member of University Council.

Members of this sub-group can seek external advice, if required.

The Director of DARO will attend meetings of the Ethics Committee as required to provide supporting evidence but will not participate in the decision making process.

7.   Ethical Checklist

Philanthropic donations are diverse and consequently the ethical considerations they raise can also vary. When considering the ethical nature of a gift, campaign, project or cause colleagues should refer to the Loughborough University Ethical Policy Framework's Ethical Principles and Checklist http://www.lboro.ac.uk/committees/ethics/. Not all points on the checklist will be applicable in all cases but the checklist provides a useful and comprehensive guide to ethical issues which might arise.

When considering the reports from the Director of DARO, the following should be of particular focus:

- The origin of the gift – where is the money or item coming from?
- The nature of the donor – are they an individual or organisation of integrity and good reputation?
- The legal and financial context of the gift – is the gift legal?
- The purpose of the gift – has the benefitting campaign, project or cause obtained ethical approval, or is it ethically sound?

8. Where to obtain further guidance

In the first instance, please contact the Director of DARO for assistance in gaining ethical approval for philanthropic gifts, fundraising campaigns and fundraising projects.

9. Charitable bodies from who gifts have been pre-approved by the Ethics Committee:

• Big Lottery Fund
• Bill & Melinda Gates Foundation
• The British Academy
• British Council
• British Heart Foundation
• Garfield Weston Foundation
• The Football Association
• Joseph Rowntree Foundation
• Leverhulme Trust
• The Nuffield Foundation
• The Princes Trust
• Royal Academy of Engineering
• The Royal Society
• Sport England
• Wellcome Trust
• Wolfson Foundation
• Youth Sports Trust
• National Lottery Funding Bodies
• The Gatsby Foundation
• The Ferguson Trust

Loughborough University

Ethics Committee

Subject: Outline process for approval of projects with military applications

Origin: Professor Steve Rothberg, PVC(E)

Summary: Ethics Committee is asked to APPROVE the following outline process for approval of

projects with military applications and to stand down the working group.

The process follows the regular pattern of
1. Self-assessment
2. Escalation to sub-committee
3. Escalation to Ethics Committee

At this stage a sub-committee will not be created until such point as the volume or specialist nature of business demands it. Hence, steps 2 and 3 are combined and escalation is to Ethics Committee.

The self-assessment element of the process is based on the generic "quick test"

Are collaborating companies on the approved list	If no, escalate through ethics committee
Is the project one where the application is primarily humanitarian e.g. humanitarian assistance, rehabilitation of injured personnel	If yes and companies are in the approved list then the self-assessment test is passed.

For all other military applications e.g. combat, intelligence gathering:	Yes/Not sure/no responses. Responses other than 'yes' require escalation to ethics committee
Is the military application legal under uk/eu law (regardless of where in the world the application might be implemented)?	
Does the action adhere without question to the ethical principles in section 2 of the framework?	If not sure / no, identify those ethical principles that are challenged by the work proposed
Will I feel comfortable about the action and its outcomes?	
Will a cross-section of my colleagues, friends or family feel comfortable about the action and its outcomes?	If not sure / no, what concerns would they express?

For projects that do not pass the self-assessment, referral follows to ethics committee with a supporting statement from the investigator(s).

The case will be considered in 2 parts: collaborating companies / governmental organisations (where there is one) and project.

In assessing collaborating companies / governmental organisation, factors considered will include:
●

- UK Government entities such as MoD (including the Armed Forces), AWE, DSTL, and GCHQ would feature permanently on the approved list by default and only be scrutinised in response to a specific challenge.
- Evidence on other organisations would include:
    - No evidence of engagement with activities that would be illegal by UK/EU law. Independent listings may be used for this purpose e.g. Aviva have compiled a list of companies that they will not invest in due to their involvement in the production of cluster munitions and land mines: http://www.aviva.com/media/news/item/avivas-position-on-cluster-munitions-an-update-17101/
    - Evidence of training in ethics for employees;
    - Evidence of commitment to ethics

corporately Such information is normally the public domain.

An approved list of companies will be established in this way. For companies in the approved list, further approvals are not required for subsequent projects. Renewal at 3-5 year intervals.

In assessing Projects, the factors considered will include:
- Projects are tested against the ethical principles in the usual way.
- Legal compliance is a minimum expectation. In this context, granting of an Export Control Licence forms a part of the minimum expectation and ethical approvals are in addition to this. Further information is available online http://www.lboro.ac.uk/export- control.html
- A register of staff who have security clearance, and the level of clearance they have will be drawn up to assist with assessment of classified projects.

In previous minutes, the importance has been noted of Statute XXI, Part 1a: "to ensure that academic staff have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges". This has not been included in the above process as it is not specific to the military projects. It is already enshrined in principle within the framework but Ethics Committee may wish to check that it is adequately portrayed.