

Loughborough University Ethical Policy Framework 2019

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 (see Annex A) 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 and the ethical approval processes are summarised in 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 (see Annex A) 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 University is a research intensive institution. The University undertakes, promotes and disseminates research of the very highest international quality and aims to engage with business, public and voluntary organisations to create social, cultural and economic impacts from its research.

Research leaders 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. Researchers 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 as a whole.

Researchers should seek research partners who share the University's ethical principles, as demonstrated through their own ethical behaviour and commitment to relevant international ethical principles. The University is committed to maintaining the highest standards of rigour and integrity in the conduct of its research as embodied in the Concordat to Support Research Integrity (2012). All those engaged in research at the University are responsible for observing the principles in the UK Research Integrity Office (UKRIO) Code of Practice for Research (2009) in all aspects of their research from initial concepts through to final dissemination of outcomes.

Research misconduct, including but not limited to plagiarism or the falsification of data, will be regarded as a serious disciplinary offence. The University is committed to using transparent, robust and fair processes to deal with allegations of research misconduct should they arise. These processes are detailed in the University's Research Misconduct Policy. Staff and students should report any concerns according to the procedure laid out in this policy.

Our ethical principles go beyond statutory, regulatory or funders' requirements, and all research activities, funded or unfunded, must adhere to the ethical principles. The principal investigator (or project supervisor where studies are conducted by students) is responsible for ensuring that appropriate ethical review is undertaken and appropriate approvals are in place. For certain areas of work, the Ethics Committee has established dedicated approval processes (Appendix 2).

Internal links

- [Code of Practice for Research](#)
- [Research Misconduct Policy](#)
- [Research Data Management Policy](#)
- [Whistleblowing Policy and Procedure](#)
- [Guidance on applying for ethical approval for research within the NHS](#)
- [All Health and Safety Policies](#)
- [Code of Practice on Investigations Involving Human Participants](#)
- [University HTA Licence Compliance Quality Manual](#)
- [Exposure to Hazardous Substances](#)
- [Exposure to Ionising Radiation](#)
- [Use of Pharmaceutical Drugs](#)
- [Compliance with Data Protection Requirements](#)
- [Data Collection and Storage](#)
- [Studies Using Pre-Existing Data](#)
- [Conducting Interviews Off-Campus and Working Alone](#)
- [Working with Children and Young People](#)
- [Using Electronic Methods or Social Media for Research](#)
- [Making Payments to Participants](#)

External Links

- [Concordat to Support Research Integrity](#) (2012)
- UK Research Integrity Office (UKRIO) [Code of Practice for Research](#) (2009)

- [Human Tissue Authority](#)
- [Health Research Authority](#)

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 academic tutors to ensure that appropriate advice and support are 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, the use of essay mills 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. All students undertaking research projects are required to complete an Ethical Awareness form. 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 and students are required to complete appropriate health, safety and risk assessments for their placements.

The institution has robust 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 documents are 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.

For all proposed studies, staff should initially complete the online [Ethical Quick Test Form](#). On submission, staff will either receive email confirmation that ethical approval is granted or an email outlining the next steps they need to take to seek full ethical approval for their study.

[Conflict of interest policy and procedure](#)

6. Sport

On global and national stages sport has experienced some profound ethical challenges in recent history and we would see this as a continuing issue. There are two main areas of concern bullying and doping which have to be high in terms of risk for the university. Loughborough University has so many connections to the broader sporting landscape that we could be connected unwittingly to an issue in these areas and we have to look to mitigate the risks and manage our media presence carefully. Recent issues have resulted in sanctions around the Paralympics and investigations into some of the UK's highest profile sports. Concerns and allegations around doping and bullying continue, with government Select Committee Reviews focusing in these areas. Loughborough plays a role in the national sports system and has national governing bodies of sport on campus as part of a vibrant sporting ecosystem. This offers many benefits but also potential risk of association with any unethical practices. It would be timely for Sport at Loughborough to consider and review its stance on "Ethics in Sport" and potentially play a lead role in helping create solutions and develop ideas.

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.

As the first university to be given the highest level of UKAD recognition via the UKAD University Accreditation scheme launched in 2015, a commitment to clean sport and the values associated with it are embedded within all elements of Loughborough University sporting practice. To demonstrate our unequivocal commitment to 'Clean Sport', the University, continually uses education as the best form of prevention on Campus. Loughborough host the training for national UKAD Educators alongside Doping Control Officers and offer tailored Clean Sport education to each performance athlete when transitioning to Loughborough University.

Loughborough also contracts UKAD to deliver a 'no notice' testing programme within its performance sport squads.

<https://www.lboro.ac.uk/media/media/sport/downloads/Athlete%20Clean%20Sport%20Commitment%20Statement.pdf>

<https://www.lboro.ac.uk/media/media/sport/downloads/Loughborough%20Clean%20Sport%20Commitment%20Statement.pdf>

<https://www.lboro.ac.uk/news-events/news/2015/december/ukad-accreditation.html>

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 lifelong 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 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. No student should be subjected to less favourable treatment on grounds of race, colour, nationality, ethnic origin, gender, gender identity, 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 behaviour which contravenes our disciplinary standards is challenged and that any unlawful behavior is communicated to the police. 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 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](#) [Loughborough University Safeguarding 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/>

Our Environmental Management System is accredited to ISO14001:2015

10. Human Resources and Organisational Development

The University values its people and recognises that its reputation is dependent on their engagement and commitment to excellence. Led by the Director of Human Resources and Organisational Development, we have developed a People Strategy, aligned with the University's Strategy, with a series of initiatives split across five priorities in the context of three themes:

- A culture that empowers people to perform at the highest levels
- An agile organisation
- An inspiring place to work and study

We have developed a fair and supportive environment, which is concerned with employee wellbeing and 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, other staff, 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. Conflicts of interest must be disclosed, but confidentiality will be respected.

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. 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 continuing change 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 and Expenses Policy](#)

[Sustainable Procurement Guidance](#)

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

The Philanthropy team within Marketing and Advancement is charged with building relationships with alumni and friends, charitable trusts, foundations and companies to soliciting donations to support the University's strategy. The Philanthropy team operates in accordance with national guidelines advised by CASE and the Institute of Fundraising, and Loughborough University is registered with the Fundraising Regulator. In the first instance, all philanthropic gifts over £10,000 that the Institution applies for or is offered are considered by the Head of Philanthropy to ensure basic compliance with law and with our ethical principles. Gifts below this amount are considered by individual members of the Philanthropy team under the supervision of the Senior Development Managers and Head of Philanthropy as their line managers. The Head of Philanthropy 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 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 its 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](#);
- [University Information Governance Policies](#)

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 Approval Processes

For research and enterprise studies, the [Ethical Quick Test](#) is intended to prompt University staff and students to consider the action/activity in simple terms and to ensure that the conduct and outcomes of the activity adhere without question to the ethical principles outlined in Section 2 of the Ethical Policy Framework. It is essential that reviewers consider the implications of an action/activity in all areas of the University's business, not just in the area within which the action/activity arises. On completion of the Ethical Quick Test, respondents will be advised by email whether ethical approval is granted for their activity or alternatively, the appropriate course of action to seek full approval.

For a range of activities, full ethical approval will need to be sought, as detailed in the table below.

Action/Activity:	Approval Route	Follow the process(es) below:
Investigations with human participants and activity falling under the Human Tissue Act	Human Participants Sub-Committee (HPSC)	1. Complete the Ethical Quick Test 2. Follow the process outlined on the HPSC Website
Military Applications, Dual Use Technologies or Security Sensitive Research	Dean/AD(R) – Ethics Committee	1. Complete the Ethical Quick Test 2. Follow the process outlined in Appendix 4
Accessing potentially security-sensitive material (e.g. online terrorist content or materials)	Dean – Chief Operating Officer – Ethics Committee	1. Complete the Ethical Quick Test 2. Follow the process outlined in Appendix 5
Funding by philanthropic gifts	Ethical Advisory (Gifts)	1. Follow the process outlined in Appendix 6
Taught Student Projects	As applicable	1. Follow the process outlined in Appendix 7
Animal testing		1. Contact the Research Governance Officer (researchpolicy@lboro.ac.uk)

For any other activities that sit partially or wholly outside those detailed above where there is a possible conflict with the ethical principles outlined in Section 2, please speak to the area's responsible person (detailed in Appendix 3) in the first instance.

Appendix 3: Responsible Persons

Strategy Area	Responsible Post	Current Postholder
Research	PVC(R)	Steve Rothberg
Learning and Teaching	PVC(T)	Rachel Thompson
Enterprise	PVC(E)	Tracy Bhamra
Sport	Director of Sport	John Steele
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 Advancement	Emma Leech
Commercial Services	Chief Operating Officer	Richard Taylor
Philanthropic gifts	Head of Philanthropy	Rachel Third
Estate	Director of Facilities Development	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 issues are considered within the process laid out in this framework.

Appendix 4



Process for Approval of Projects Involving Research with Military Applications or Dual Use Technologies (non-military items which may also be used for military purposes)

This process applies to non-military research where this may also be used for military purposes regardless of the funding source.

Researchers must comply with all legal requirements relating to non-proliferation and dual-use, particularly export controls. Export controls apply to the transfer (by any means) of goods, technology, software and/or knowledge from the UK to a destination outside the UK that may be used for military or Weapons of Mass Destruction purposes.

Export Control regulations place significant limitations on the exporting of certain technology and information from the UK – it is not always immediately obvious which technologies and information are captured by this regime, so careful thought must be given. Failure to comply with Export Controls can give rise to criminal liability. For more information and relevant resources please visit: <http://www.lboro.ac.uk/export-control.html>

Approval Process

The process follows the regular pattern of:

1. Self-assessment
2. Escalation to ADR/Dean
3. Escalation to relevant sub-committee (where applicable)
4. Escalation to Ethics Committee

At this stage a specific sub-committee will not be created until such point as the volume or specialist nature of business demands it. Hence, steps 3 and 4 are combined and escalation is to Ethics Committee.

The self-assessment element of the process is based on the completing the form on the following page.

Research with Military Applications, or Dual Use Technologies Self Assessment Form

Project title:

Investigators:

Is the project one where the application is primarily humanitarian e.g. humanitarian assistance, rehabilitation of injured personnel?	<i>If yes the self-assessment test is passed.</i>
Does the study involve activity that raises any Weapons of Mass Destruction (WMD)-end use control concerns?	<i>If yes then the project details should be submitted to the Ethics Committee</i>

<u>For all other Research with Military Applications, or Dual Use Technologies</u>	Responses other than 'yes' require escalation to AD(R)/Dean and then if unresolved 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?	
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?	

AD(R)/Dean approval/referral if required

Signed:

Date:

Referred to Ethics Committee:

YES/NO

For projects that do not pass the self-assessment, referral follows to Ethics Committee with a supporting statement from the investigator(s) which should address the issues raised. The case will be considered in two steps:

Step 1: Collaborating companies / governmental organisations (where there is one)

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 only be scrutinised in response to a specific challenge due to the nature of the project.
- Evidence on companies/organisations would include:
 - Evidence that they have no 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:
https://www.aviva.com/media/upload/Companies_we_do_not_invest_in_G0KqBhA.pdf
 - Evidence of training in ethics for employees;
 - Evidence of commitment to ethics corporately. This information is normally the public domain.
 - If projects from the company have been approved by Ethics Committee (as recorded in the minutes) within the previous 3 years this step can be skipped.

Step 2: Project Description

The factors considered will include:

- Projects will be 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>
- Whether staff involved have the necessary security clearance.

Appendix 5



Process for Approval of Projects or Research Requiring Access to Potentially Security-Sensitive Material (e.g. Online Terrorist Content or Materials)

Researchers undertaking projects or research requiring access to potentially security-sensitive material (e.g. online terrorist content or materials) must complete the pro-forma below.

Approval Process

The process follows the regular pattern, except that there is no specific sub-committee in this area, and escalation beyond the relevant Dean and Chief Operating Officer is therefore direct to the Ethics Committee.

1. Self-assessment is based on completing the form on the following page.
2. Escalation to the relevant Dean, to consider the content of the proposal, and to the Chief Operating Officer, for central oversight and so that any potential enquiries from security services can be dealt with promptly, sensitively and appropriately.
3. Escalation to Ethics Committee (if the Dean or COO have concerns about the proposed project or research which cannot be otherwise resolved).

PLEASE NOTE: If clearance is given to proceed with your project you should only access online, security-sensitive material from University computers

Self Assessment Form for Projects or Research Requiring Access to Potentially Security-Sensitive Material (e.g. Online Terrorist Content or Materials)

Project title:

Investigators:

1. If the project or research will require you to access potentially security-sensitive material (e.g. online terrorist content or materials), please specify the nature of this content and the purpose for which you will be accessing it (if you aware of specific URLs you should indicate these).

--

2. Please specify the time period during which you will need to access the potentially security-sensitive material (this may be the duration of research project or a specific period of time within the research project).

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Considered by Dean:

Signed: Date:

Considered by Chief Operating Officer:

Signed:..... Date:

Referred to Ethics Committee: YES/NO

Appendix 6



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?

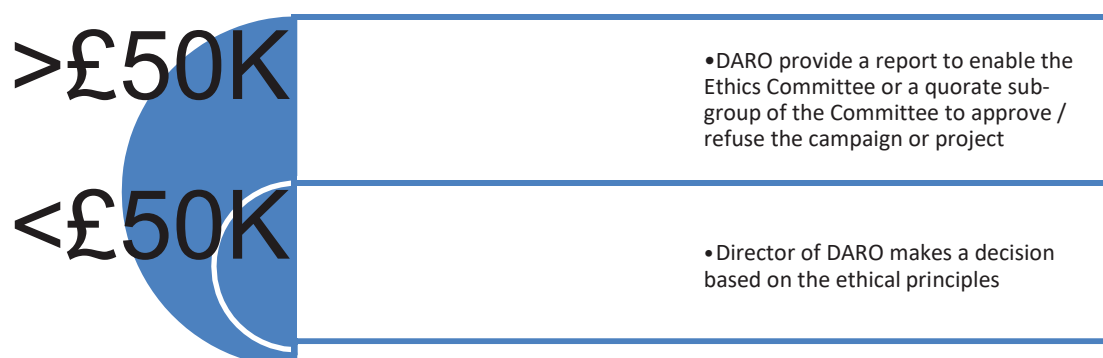
Philanthropic gifts, typically gifts of money and artefacts, are intended to assist the University to pursue its strategic aims without bringing material reward to the donor. While philanthropic giving is generally associated with cash gifts, it may also take other forms such as the donation of shares,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

Philanthropic giving should not be confused with sponsorship which is 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 its potential value to the University:



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?

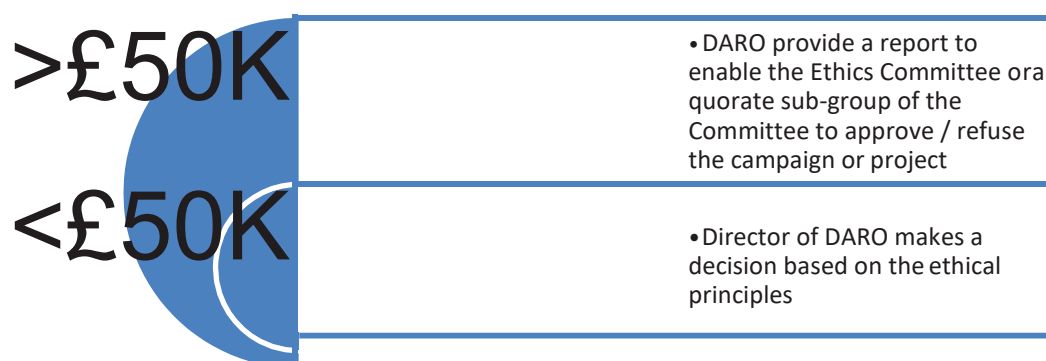
All discussions relating to philanthropic gifts should be supported by the Development and Alumni Relations Office (DARO). Discussions originating outside of DARO should involve DARO staff at the earliest opportunity. To facilitate these discussions, DARO will research and review information that is 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.

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:



For gifts (or cumulative gifts) in excess of £50K Ethics Committee or a quorate sub-group of the Committee will receive 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.

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.

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](#). 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 principles in Section 2, 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 Framework Principles

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.

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

Appendix 7



Ethical Awareness Form for Taught Student Projects

Project Title/Topic:

All students should discuss with their supervisor whether their project might conflict with the University's ethical principles which can be found in the [Ethical Policy Framework](#).

Students should complete the second column in the table below, discussing with their supervisor as appropriate.

Aspect of project	Does the project involve this aspect? (Yes / No)	If Yes, follow the process(es) below
Investigations with human participants and activity falling under the Human Tissue Act		1. Complete the Ethical Quick Test 2. Follow the process outlined on the HPSC Website
Military Applications, Dual Use Technologies or Security Sensitive Research		1. Complete the Ethical Quick Test 2. Follow the process outlined in Appendix 4
Accessing potentially security-sensitive material (e.g. online terrorist content or materials)		1. Complete the Ethical Quick Test 2. Follow the process outlined in Appendix 5
Funding by philanthropic gifts		Follow the process outlined in Appendix 6
Animal testing		Contact the Research Governance Officer: researchpolicy@lboro.ac.uk
Possible conflict with ethical principles partially or wholly outside the above.		1. Complete the Ethical Quick Test

Student Declaration

I confirm that I have discussed the ethics awareness form with my supervisor and, if appropriate, followed the relevant guidance / made the relevant application.

Student name: Student ID number:

Signature: Date:

Supervisor Declaration

I confirm that I have discussed the ethics awareness form with my supervisee and, if appropriate, requested that they follow the relevant guidance / make the relevant application.

Supervisor name:

Signature: Date:

Approved by
Learning and Teaching Committee
7 March 2017

Annex A: 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 (see Annex B) 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.

Annex B

Modern slavery and human trafficking statement 2015-16

Introduction from the Chief Operating Officer

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring our practices do not support organisations or individuals who engage in slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st July 2016.

Organisational structure

We are a leading UK university in the higher education sector, with a reputation for excellence in teaching and research, strong links with business and industry and unrivalled sporting achievement. The University has over 17,000 students and over 3,500 staff. In 2015-16, we had total income of £291 million and total expenditure of £275 million.

Loughborough's Chancellor is the formal principal officer. The Chancellor is also an ex-officio member of the University Council and confers degrees on Loughborough's graduates. The day-to-day running of the University is the responsibility of the Vice Chancellor and President, Professor Robert Allison, who is the academic and executive head.

The Vice Chancellor works closely with the Academic Leadership Team which includes: the Provost and Deputy Vice Chancellor, three Pro Vice Chancellors, the Chief Operating Officer, the Director of Finance and ten School Deans. He also works closely with other senior officers.

The University Council is the governing body, responsible for the University's strategy and overall governance. It is the official employer of all staff and meets four times a year. Its Chair is the Senior Pro Chancellor, Sir Peter Bonfield.

The University Senate is responsible for the academic work of the University, academic awards, teaching and research quality. Its membership is drawn from the academic staff of the University.

The University has 20 academic schools and departments, over 100 research groups, institutes and centres, and over 35 professional services teams.

We categorise our procurement spend as follows: *(The percentage split is indicative)*

Estates/Construction	44.5%	Library	3.8%	Office Supplies	1.1%
Professional Services	12%	Catering	3.7%	Domestic/Cleaning	0.5%
Laboratory & Medical	11.1%	Miscellaneous	3.6%	Postal Services	0.3%
IT & Telecommunications	10.6%	Furniture	1.6%		
Travel & Accommodation	6%	Audio Visual	1.2%		

We have purchased NETpositive's Supplier Engagement Tool, which allows our suppliers to generate their own, bespoke Sustainability Action Plans, which includes context-specific modern slavery due diligence actions/measures. As suppliers use the portal to update their progress against their Sustainability Action Plan, we can run reports to establish the progress made across our supply base; informing future modern slavery and human trafficking statements.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. During this reporting period, a member of the Procurement Team attended a training course to gain a fuller understanding of the Modern Slavery Act 2015 and best practice policies and procedures that can be established to mitigate the risk of modern slavery or human trafficking in the supply chain.

Our University Strategy, workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our procurement policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Our HR policies and procedures reflect UK employment law.

The University's Procurement Regulations require compliance with the Modern Slavery Act 2015.

The University's Sustainable Procurement Guidance Note explicitly references the Modern Slavery Act 2015, with slavery and human trafficking included within the pre-procurement risk assessment tool. It also prompts consideration of the appropriateness of using labour standards (including ILO core conventions) as selection criteria.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have not only reflected the requirements of the Modern Slavery Act 2015 in our policies and procedures, but also in our working documents. The risk of slavery and human trafficking within the supply chain is now flagged and mitigated within the Procurement Strategy checklist/template, pre-qualification/tender documents and the University's Standard Terms and Conditions.

The University's Procurement Team will now fully embed and improve our systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Review/monitor potential risk areas in our supply chains

In doing so, we will engage with other universities and higher education purchasing consortia, not least the North Eastern Universities Purchasing Consortium (NEUPC) of which the University is a member, to agree how best our combined resource may be used to identify and review/monitor risks of slavery and human trafficking in our supply chains.

Supplier adherence to our values

We have zero tolerance of slavery and human trafficking. As well as taking mitigating measures through the procurement process (adding appropriate pre-qualification/tender questions and standard contract clauses), we will use the Supplier Engagement Tool to monitor suppliers' progress in building such mitigation measures into their processes.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, we will add them to our new rolling in-house Procurement training, as well as the mitigation measures mentioned above.

Our effectiveness in combating slavery and human trafficking

We will measure our effectiveness in combatting slavery and human trafficking by charting the progress of our suppliers in responding to the relevant actions generated through the Supplier Engagement Tool.

Richard Taylor

Chief Operating Officer Loughborough University

On behalf of the Council of Loughborough University which approved this statement on 24 November 2016