

CODE OF ETHICS POLICY

Introduction

This Code of Ethics is derived from work undertaken by the Association of Colleges. It does not seek to rehearse the legal framework governing the operation of Colleges, but takes as its starting point the distribution of powers and responsibilities set out in governing legislation, including charity law, and set out in the Corporation's Instrument and Articles of Government. It lays down general principles which can be used to determine action, which will conform to the high standards and values expected in the public sector. It is consistent with the Code of Good Governance for English Colleges, which the College adopted in 2015.

The Model

A. Overview of general values

1. In all College activities it is important to develop and promote a set of core values relevant to its mission statement to provide high quality learning opportunities for students.
2. As an institution funded primarily by public money), the College accepts that those values must conform with the principles laid down by the Nolan Committee for those holding public office – selflessness, integrity, objectivity, accountability, openness, honesty and leadership
3. The College recognises its obligations to all those with whom it has dealings – students, employees, employers, suppliers, other educational institutions and the wider community – and also to the public generally, and more particularly, the taxpayer.
4. The reputation of the College, including the trust and confidence of those with whom it deals, is one of its most vital assets, the protection of which is of fundamental importance.
5. The College requires and demands the highest ethical standards in carrying out its activities.
6. In its dealings with individuals, the College will adhere to the principles of natural justice and the civil and human rights of individuals.
7. The College will seek to encourage a culture of openness aimed at ensuring that matters connected with the operation of the College can be discussed frankly with staff and students. It will adopt and maintain Policy and Procedures on Whistleblowing which will enable concerns to be raised on a confidential basis, where that is appropriate, both inside and, if necessary, outside the organisation.
8. The College is committed to securing equality of opportunity for staff and students alike, to discharging its legal duties under relevant equality legislation (Equality Act 2010) and to safeguarding staff and students within the College environment.

B. Values relating to students

1. The College believes that integrity in dealing with its students or prospective students is a prerequisite for success and an important statement of the values it offers.
2. The College will not deliberately give inadequate or misleading information on its learning programmes or other services.
3. In all advertising and public communications, the College will accurately promote its programmes and achievements.
4. The College will not countenance recruitment or other practices that involve the offer of improper financial or other inducements to students.
5. The College will make all reasonable attempts to deliver learning programmes and support services to meet the particular needs of students efficiently and effectively to accepted quality standards and will take reasonable steps to rectify any shortcomings in the service delivered.
6. Learning support, information, advice and guidance offered to students will be impartial and guided by the best interests of the student, so far as it is practicable to do so.
7. The College will publish a statement setting out what students and others can expect of the College and details of its complaints and appeals procedures. It will deal with all students with equal care and respect.
8. The College will ensure that complaints are dealt with fairly, openly and efficiently and in compliance with laid down, published procedures.
9. Within the requirements of the law and in accordance with the General Data Protection Act Regulations May 2018 and subsequent amendments, the College will maintain the confidentiality of information on individual students. (Refer to the College GDPR Policy and Procedure)

C. Values relating to our Educational Partners

1. The College is committed to collaborative arrangements that will benefit the institution and its students. Where the College is in competition with others, the College will compete vigorously, but honestly, with other educational providers offering similar learning opportunities.
2. The College will not seek to damage the reputation of competitors or other third parties either directly or by innuendo.
3. The College will provide information on individual students to any Government institutions engaged in providing for the learning needs of the student in accordance with agreed procedures, within the requirements of the General Data Protection Act Regulations May 2018 and subsequent amendments 1998 or any other relevant statute.
4. The College will not seek to acquire information regarding competitors by unfair or disreputable means.
5. The College will not engage in unfair or restrictive practices regarding the recruitment or retention of students.
6. The College will consult with institutions and/or service providers who might be affected on any significant proposals for change in the learning programmes or services it offers.

D. The Board of Governors of the Corporation

1. The Corporation will adopt a Code of Conduct for itself consistent with the principles laid down by the Nolan Committee and the requirements of its Instrument and Articles of Government.
2. The College will maintain a Register of Members' Interests which will be open to inspection by the public. Members required to register those interests, which are

of relevance to the work of the College, insufficient detail to allow the nature of those interests to be understood by enquirers and those interests will be reviewed and updated annually.

3. The Corporation will seek to ensure that its members are appointed on merit, after an open selection process, and are drawn widely from the community it serves, having regard to the need for continuity and freshness, and for a range of skills and interests.
4. The Corporation will fully undertake its statutory responsibilities as set out in Article 3 (i), and will not delegate these responsibilities.
5. The rules and byelaws by which the Corporation conducts its business shall be set out in its Standing Orders.
6. The Corporation will adopt procedures which ensure sound financial decision making, control and monitoring to meet the requirements of the funding bodies and public audit.
7. The Corporation will ensure that information on its decisions and the work of the College is made publicly available, having regard to proper confidentiality as determined by the Corporation (and regularly reviewed) and any legal requirements.

E. Management and Staff

1. The College will adopt a Code of Professional Conduct for its employees, based on similar principles to that for Members.
2. The staff Code of Professional Conduct will forbid employees from soliciting or accepting inducements in respect of any matter connected with the operation of the College
3. The staff Code of Professional Conduct will be consistent with the College Code of Practice on Freedom of Speech in respecting the freedom within the law of academic staff to question and test received wisdom, and to put forward new ideas or controversial or unpopular opinions without placing their employment in jeopardy. This includes the right of staff to speak freely and without being subject to disciplinary sanctions or victimisation about academic standards or related matters, provided that they do so lawfully, in confidence, without malice and in the public interest. (Refer to the Whistleblowing Policy and Procedure)
4. Where the College includes confidentiality clauses in severance contracts or agreements, this will not prevent staff who have legitimate concerns about malpractice raising these concerns with the appropriate authority.
5. As Accounting Officer for the College under the Financial Memorandum, the Principal and Chief Executive will be responsible for the propriety of financial decision making and will advise the Corporation of any requirements in respect of matters before it.
6. Within the requirements of the law and in accordance with the General Data Protection Act Regulations May 2018 and subsequent amendments, the College will maintain the confidentiality of information on individual staff. (Refer to the College GDPR Policy and Procedure)

F. External Relationships

1. The College recognises that it is responsible to the community it serves and will take steps to ensure that information on its external activities is made publicly available, noting any requirements for confidentiality that may be applicable and which shall be explained as necessary.
2. The College will be responsive to its community and within the framework of its own Mission Statement will seek to provide programmes and services relevant to the needs of individuals and employers.

3. The College will provide timely and accurate information to the best of its abilities on individual students to employers or others providing sponsorship, within the confines of the General Data Protection Act Regulations May 2018 and subsequent amendments and any other relevant contractual or general legal requirements.
4. The College will ensure that its contracts with organisations comply with acceptable ethical standards and any legal duties, for example, the general duty under the Equality Act 2010 to eliminate discrimination, to promote equality of opportunity and to promote good community relations.

G. Compliance and Verification

1. The College will require all its employees, officials and sub-contractors to adhere to its Code of Professional Conduct for staff.
2. The College will create mechanisms by which employees and students can express genuinely held concerns about behaviour or decisions they perceive to involve serious impropriety, and have them investigated, with every reasonable assurance of confidentiality as appropriate.
3. The Clerk will be responsible for monitoring adherence to the Members' Code of Conduct by Members of the Corporation, investigating alleged breaches and reporting to the Corporation. The Corporation will decide on any action to be taken to ensure compliance with the Code.
4. The Principal and Chief Executive will be responsible for initiating and supervising investigations into alleged breaches of the Code of Conduct by members of staff, and for ensuring that appropriate action is taken.
5. The College auditors (internal and external) may be asked to report on any practice that appears to breach the Code.
6. The College will ensure that its Codes are published and made publicly available, and that they are regularly reviewed.

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