



Code of Ethics – Employees, Trustees and Volunteers 2020-21

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1. Introduction

1.1 NMITE is committed to the highest standards of ethical conduct in all of our activities. Each member of NMITE community – staff (including honorary, emeritus and visiting staff), learners, Trustees and volunteers have a responsibility to act ethically and in accordance with the Nolan Committee’s principles¹ for public life; *Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership*.

Selflessness – NMITE members should act solely in terms of the public interest.

Integrity – NMITE members must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interest and relationships.

Objectivity – NMITE members must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability - NMITE members are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

¹ The Nolan Principles - <https://www.gov.uk/government/publications/the-7-principles-of-public-life>



Openness – NMITE members should act and take decisions in an open and transparent manner, Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty – NMITE members should be truthful

Leadership – NMITE members should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

- 1.2 Ethical conduct means acting consistently in a way that is ethical and fair and encouraging others to do likewise; it should not be an isolated response to a specific situation.
- 1.3 NMITE recognises that ethical queries can arise in a variety of circumstances. It is the responsibility of all members of NMITE to act ethically. If in doubt about how to resolve an ethical dilemma, the following guidance for individuals on decision making will help form the basis for good ethical behaviour.

2. Code of Ethics in Practice

- 2.1 Every member of NMITE is expected to act with integrity in their work. Good ethical conduct is not an isolated response to a specific problem, but the process of making effective choices from day to day. When dealing with a situation with ethical implications, you should consider the following questions and guidance.
- 2.2 Are you confident that your decision is the correct action?
 - i. Could you happily justify your behaviour to your Manager or a colleague or friend if asked?
 - ii. What would your actions look like if published in the media?
 - iii. What could go wrong as a result of your decision for you, your colleagues, other stakeholders or NMITE as a whole?

3. Promoting Equality

- 3.1 NMITE is committed to an inclusive learning and working environment that will enable staff and learners to reach their full potential, in accordance with NMITE's [Equality, Diversity and Dignity in the Workplace Policy](#). This accords with the duties under the Equality Act 2010 to treat learners, staff and visitors to NMITE with dignity and respect, not to unlawfully discriminate as set out in the Equality Act, and to promote good relations and equal opportunities.

4. Academic Freedom

- 4.1 Academic Freedom is an important consideration in ethical matters relating to research and teaching. NMITE's commitment to academic freedom is incorporated within the founding principles. NMITE will ensure that members of Academic Staff have the freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without fear of reproach.



5. Fundraising & Gifts

- 5.1 The NMITE Senior Leadership Team has oversight of fundraising and gifts and very difficult ethical cases in these areas can be escalated to the Board of Trustees. The Head of Fundraising is responsible for all ethical matters in fundraising and gifts. Please see the [Gift Acceptance Policy](#).
- 5.2 All gifts donated to NMITE should be directed and processed by the Fundraising team.
- 5.3 All potential donors and donations – regardless of the potential gift amount – should be discussed with the Head of Fundraising or their delegate at the earliest possible stage and before any donation is accepted.
- 5.4 Due diligence will be undertaken in respect of all single gifts greater than £99.99 and/or where the total value of donations amounts to more than £500,000. Potential reputational risks that result from negative public perception will be considered.
- 5.5 Any donor records maintained by NMITE will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record and challenge its accuracy. NMITE will not sell either its donor or alumni lists to any third parties.
- 5.6 Donors accept that the management and governance of programme and/or activities funded through Fundraising, rests solely with NMITE.

6. Finance & Procurement

- 6.1 General oversight of ethical issues in NMITE finance is the responsibility of the Chief Executive Officer. The Finance Director has the overall day to day responsibility of ethical compliance. NMITE uses the funds in alignment with the charitable status and ethical principles.

7. Honest & Transparent Operations

- 7.1 It is NMITE's Policy that all staff, learners, Trustees and volunteers working on behalf of NMITE conduct business without the use of corrupt practices or acts of bribery to obtain an unfair advantage.
- 7.2 All staff, Trustees and volunteers are required to recognise and declare activities or circumstances that might give rise to conflicts of interest or the perception of conflicts as it first arises, and to ensure that such conflicts are seen to be properly managed. Discussions should be held with the individual's Manager and a central record kept of any (perceived) conflict of interest.
- 7.3 It is an offence under the Bribery Act 2010 for members of staff, learners, Trustee of volunteers to accept, offer or give corruptly any gift or consideration (including hospitality) as an inducement or reward. Giving or receiving gifts, entertainment of hospitality in matters connected with NMITE business is



acceptable provided they fall within reasonable bounds of value and occurrence.

- 7.4 All members of NMITE community must risk assess the vulnerability of their activities to accusations of bribery and corruption, particularly overseas activities, on a continuous basis.

8. Socially Responsible Investment

- 8.1 As an educational charity, NMITE must be mindful of securing the effective use of its funds to ensure its financial sustainability.

9. Procurement

- 9.1 Expenditure of NMITE funds must be administered with the highest levels of probity and transparency with all parties responsible for securing the best value for money in purchases. To our best endeavours, NMITE ensures that our chosen suppliers also abide by standards of ethical conduct that satisfy our requirements.
- 9.2 The procurement department undertakes due diligence, which includes consideration of reputational and ethical considerations as part of the contracting process, raising issues with the Finance Director as necessary.

If you have any problems or queries, please contact the HR Department.