



Ethical Policy

Core Documentation Cover Page					
Ethical Policy					
Version number	Dates produced and approved (include committee)	Reason for production/ revision	Author/Owner	Location(s)	Proposed next review date and approval required
V1.0	April 2021 SMT	To set out the ethical framework within which the UCO will conduct its affairs and with which all staff, students, and associates of the UCO will be expected to comply.	Trusts and Foundations Manager/Vice Chancellor's Group	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	April 2024
Equality Impact					
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)					
Neutral equality impact (i.e. no significant effect)					
Negative equality impact (i.e. increasing inequalities)					
<p>If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk</p>					

ETHICAL POLICY

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1. SCOPE OF POLICY

1.1 The University College of Osteopathy is committed to operating in an ethical way in every area to ensure the highest possible standards of decision-making and accountability. This statement provides the context of a range of policies, regulations and codes that cover specific issues with an ethical dimension. These are available on the UCO website and a link is provided in applicable sections. Additionally, staff members are required to adhere to any relevant legislation including that, which is specific to their area of responsibility.

1.2 This policy provides a framework for professional practice and decision-making on ethical issues as they arise in the work of the UCO, ensuring that all within the organisation have a consistent ethical approach across all operations.

1.3 As a public body, the UCO expects all its members (individually and collectively), its collaborative partners and those providing a service to the UCO to be committed to upholding the UCO's Ethical Policy.

1.4 This policy ensures that appropriate safeguards and processes are set to protect our students and patients and the UCO's reputation, as well as those we interact with – volunteers, healthcare professionals, donors and supporters, and members of the public.

1.5 This policy will be publicly published as we aim to be transparent and accountable in our activities and actions.

1.6 The scope of this policy covers all our activities as an organisation and applies to: delivery of services, procurement decisions, partnerships of any kind, fundraising and acceptance of funding (donations, legacy, grants, in-kind donations, sponsorships, etc.), investments, and contractual agreements. Each section shows related policies and procedures, and how this overarching policy sits across all operations.

2. OUR ETHICAL FRAMEWORK

2.1 The UCO's Ethical Policy aims to embed the UCO's values and principles into all our activities and to guide behaviour of members of the University. It is intended to complement and reflect existing UCO policies, procedures and codes of conduct and practice.

2.2 This Policy provides a framework for professional practice and decision-making on ethical issues as they arise in the work of the UCO.

3. OUR VALUES

3.1 The UCO's culture and shared values allow staff to work together towards a shared mission where the success of the of the University and its students is a common priority.

Our Ethical Policy is advised by our values:

- > Students and patients will always come first
- > A culture of critical enquiry, scholarship and research
- > A respect for the heritage and values of osteopathy
- > A respect for creativity and innovation
- > A respect for equal opportunities
- > A celebration of diversity
- > A culture of openness and honesty
- > A culture of collaboration and teamwork
- > A desire for environmental sustainability

Further information and related policies:

The UCO's Strategic Plan for 2018-23	https://www.uco.ac.uk/about-uco/who-we-are/mission-values-and-strategy
Equality Diversity Policy	https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy

4. STUDENT EXPERIENCE

4.1 The UCO has a duty of care for all students of the UCO. We promote a culture of inclusive learning and exchange of ideas where students are encouraged to challenge, critique, and seek out knowledge. We believe that all students, regardless of background or personal circumstances, should be treated with dignity, respect and fairness. In return, all students and staff have a responsibility to treat colleagues and peers with dignity and respect.

4.2 Students are expected to maintain high standards of personal and academic behaviour during their studies. Students must recognise that they are independent adults with legal and social responsibilities and are therefore personally accountable for their actions and behaviour.

The UCO aims to foster a community which has an atmosphere of trust and respect. Students are expected to conduct themselves in accordance with these principles, and with the UCO's commitment to access and diversity. They should show proper concern in their behaviour for the reputation of the UCO and the student body, and for its effect on their fellow students, staff and their successors.

Further information and related policies:

Antibullying & Harassment Policy
Academic Discipline Policy
Code of Conduct & Disciplinary Procedure
Plagiarism Policy
Fitness to Practise Policy
Freedom of Speech Policy and Procedure
Student Protection Plan
Support to Study Policy
Student Welfare Policy
Student Charter

To access these policies please visit: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

Point of Contact: Deputy Vice Chancellor (Education) or Head of Student Services

5. RESEARCH ETHICS

5.1 In line with the UCO's Research Governance and Integrity Policy, Researchers are expected to be aware of and to comply with all relevant ethical and legal standards and frameworks including the standards of research practice as published by the UCO, scientific and learned societies, funding bodies and other relevant professional bodies or stakeholders.

5.2 Research ethics committees are responsible for reviewing ethics applications to ensure that adequate consideration has been given to the ethical aspects of a research project. The main purpose of University Research Ethics Committee is to protect and safeguard potential participants in research as well as take into account the potential benefits for the community affected by the proposed research.

This includes recognising that research in the context of some award bearing programmes of learning has the dual aim of creating knowledge as well as delivering learning opportunities to students.

5.3 The ethics committee will assess whether the research proposed can be considered

ethical, i.e. whether:

- a) The research is justified, i.e. whether it is likely to add to the existing knowledge base;
- b) It is of sufficient standard – including whether the researchers are qualified to carry out the roles proposed in the research proposal;
- c) The risk it poses to participants is outweighed by the potential benefits of the Research;
- d) The research appears to comply with all statutory and other guidance;
- e) Data management and handling appears to comply with the relevant legislation
- f) Financial and resource arrangements appear sufficient to enable delivery of the proposed research.

5.4 Projects conducted by the UCO staff, students and collaborators that have the potential to cause harm, disturb or upset human participants or where participants they can be deemed to be in a vulnerable or disadvantageous situation, must be presented to the research ethics committee before they begin.

5.5 The purpose of obtaining ethical review is to show that researchers have thought about the ethical implications of their research and will conduct their research in an ethical way. Once they have ethical approval, they cannot deviate from the procedures approved by the research ethics committee that was approved. If they need to deviate from the protocol, the proposed amendment should be notified to all stakeholders in the project.

Further information and related policies:

Research Governance and Integrity Policy
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Research Misconduct Policy

To access these policies please visit: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

Point of Contact: Deputy Vice Chancellor (Research)

6. FUNDRAISING ETHICS

6.1 The UCO is committed to its charitable aims and fundraises towards our mission to continually provide the highest quality education and research for all and the very best care, for each patient, on every occasion.

6.2 The UCO is an exempt charity under the provision of the Charities Act 2011. An exempt charity is exempt from registration with and direct regulation by the Charity Commission. The Office for Students (OfS) is the principal regulator for those higher education providers in England that are exempt charities and for exempt charities that are closely connected with them; this includes the UCO.

6.3 As an exempt charity, the UCO has the same tax benefits of registered charities which include the ability to recover tax deducted from deeds of covenant and receipts under Gift Aid, exemption from Inheritance Tax for Donors to the institution and exemption from Capital Gains Tax. The UCO's gift aid number (otherwise officially titled HMRC Charities Reference) is X45098.

6.4 Fundraising practice must follow the fundraising provisions of the Charities Acts and other relevant legislation, and local government by-laws. Fundraising is regulated by the Fundraising Regulator which holds the Code of Fundraising Practice for the UK. The Fundraising Regulator is there to ensure that all fundraising is legal, open, honest and accountable.

6.5 We are dedicated to responsible fundraising practices. We are registered with the Fundraising Regulator and have signed up to the fundraising promise which means our fundraising activity will always be legal, open, honest and respectful.

6.6 At the UCO, we are committed to fundraising in an honest and responsible way, so we take care to ensure we act appropriately with children, young people and people who may be in vulnerable circumstances. As such, we publish our Safeguarding of Children, Young People and People in Vulnerable Circumstances in Fundraising on our website.

6.7 Private Sector Relationships and Community Partnerships

6.7.1 The UCO seeks opportunities to work with a range of commercial organisations to achieve our strategic aims. However, it is vital that we maintain our independence and ensure we safeguard the reputation of the UCO. We will only work in partnership with companies that benefit our strategic aims and uphold our ethical standards.

6.7.2 Reasons for declining opportunities. We have a duty not to decline opportunities or funding which will help us achieve our objectives without good reason for doing so.

6.7.3 When deciding to accept philanthropic donations or develop community partnerships, we will consider the extent to which a potential partner has taken positive steps to mitigate or resolve past issues of concern.

6.8 Below is a list of categories which require special attention given the potential to compromise our values, reputation, independence, or our ability to carry out our work and charitable aims.

- Alcohol
- Arms and ammunition
- Pharmaceuticals
- Pornography
- Tobacco

6.9 Due diligence

6.9.1 Due diligence must be completed by the Fundraising Department prior to, or otherwise within 3 months of:

- Receiving a gift, or cumulative gifts, of over £100,000
- Approving a volunteer to act as a Fundraiser for the UCO
- Receiving a gift or developing a relationship with a company in one the fields listed in Section 6.8.

6.9.2 If a due diligence assessment presents an ambiguous situation, this can be escalated to the appropriate committee such as the Finance & Estates Committee, Fundraising Committee or Audit and Risk Committee. These decisions are not binding, i.e. if a potential partner or donation was turned down it does not automatically mean we not work or engage with them in the future.

Further information and related policies:

Complaints Policy & Procedure for Supporters	https://www.uco.ac.uk/about-uco/support-us/support-trusts-and-foundations
Fundraising Promise	https://www.uco.ac.uk/about-uco/support-us/support-trusts-and-foundations
Safeguarding of Children, Young People and People in Vulnerable Circumstances in Fundraising	https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy

Point of Contact: Trusts and Foundations Manager

7. INVESTMENT ETHICS

7.1 The Board's policy, in view of the short-term nature of most of the funds currently available, is that any cash that is surplus to current operational needs may go on short- or longer-term investment, as may be appropriate. Any such investment must meet or exceed the recognised benchmark as agreed by the Board.

7.2 Investments must be ethical as defined by the Board by reference to the UCO's declared objectives. There should be no direct holding of investments in pharmaceutical or tobacco companies, and that the percentage of these industry types in managed funds should not exceed 5% of the managed fund total.

Point of Contact: Finance Director

8. SUSTAINABILITY AND ENVIRONMENT

8.1 The UCO recognises its activities will impact the environment and seeks to promote environmental and sustainability awareness. The UCO accepts the responsibility it has for protecting the environment and aims to minimise its impact whilst fulfilling its strategic objectives. The UCO seeks to promote the conservation of natural resources and aims to adhere to best practice wherever possible.

8.2 The UCO aims to ensure environmental sustainability is integrated into its policies and procedures with particular attention given to the following objectives:

- 8.2.1 To meet or exceed all legislative requirements
- 8.2.2 To set clear and obtainable targets and objectives
- 8.2.3 To monitor progress and report annually to all stakeholders
- 8.2.4 To reduce carbon emissions through the delivery of a Carbon Management Plan
- 8.2.5 To ensure all new buildings and capital projects take sustainability into account
- 8.2.6 To encourage sustainable travel practices by all stakeholders through the implementation of the Travel Plan
- 8.2.7 To consider the environmental performance and standards of suppliers when procuring goods and services
- 8.2.8 To conserve material resources and encourage re-use of existing supplies wherever possible
- 8.2.9 To promote recycling and reduce waste production
- 8.2.10 To ensure zero waste goes to landfill wherever possible
- 8.2.11 To communicate with stakeholders to promote and encourage a culture of environmental awareness and understanding

Further information and related policies:

Environmental Sustainability Policy

Carbon Management Plan

To access these policies please visit: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

Point of Contact: Head of Estates

9. STAFFING PRACTICES ETHICS

9.1 UCO has rigorous staffing policies and procedures to ensure compliance with human rights and fair labour / worker practices including the following:

9.2 Our recruitment, induction and onboarding processes are designed to ensure that full right to work documentation is obtained and that each new member of staff is issued with a contract of employment stating their hours of work.

9.3 Our staffing policies ensure that health, safety and wellbeing are promoted with all overtime being voluntary. New UCO staff are issued with a contract of employment explaining the regulations relating to working time and how to notify UCO if their combined hours of work here and at any other employer exceed the usual levels / limits.

9.4 Staff have access to a suite of employee benefits including a healthcare cash plan with access to an Employee Assistance Programme and a named line manager within UCO to raise concerns of welfare, workload, hours worked etc. Regular one to one supervision sessions and an annual Performance Development Review meeting provide documented protected time to discuss and agree the employee's workload, working hours, job description amendments etc.

Further information and related policies:

Appraisal and Professional Development Review Policy
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Staff Grievance Procedure

Antibullying & Harassment Policy

Health and Safety Policy

Change Management Policy

Disciplinary & Capability Procedures

To access these policies please visit: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

Point of Contact: Head of Human Resources

10. CLINICAL ETHICS

10.1 The UCO's clinical services aim to provide excellent affordable care for the local community in addition to an environment which promotes inclusive learning and best practice. Providers of care, supervisors and support staff adhere to appropriate clinical governance and regulatory frameworks.

10.2 Our commitment to ethical clinical practice includes:

- Treating and respecting people as individuals in an inclusive and fair environment
- Respecting peoples' expectations and preferences for care
- Respecting privacy, confidentiality and modesty of individuals
- Delivering care consensually with honesty, integrity and candour.
- Working in partnership with people to ensure that they receive the best care for them and recognising the limits of our service and that this may result in referral to other services.
- Our staff and students will recognise their own limitations and seek support and assistance appropriately.
- Delivering care in a learning environment that values continuing professional development at all stages of a career in a collegial manner and recognises the need to keep abreast with contemporary best practice.
- Identifying ourselves clearly to people seeking care, maintaining the high standards of hygiene and communicating effectively with individuals

Further information and related policies:

Infection control policy
Safeguarding policy
Safeguarding students and staff from violent and aggressive patients
Complaints policy and procedures
Fitness to practice and professional behaviour policy
Pregnancy, maternity and paternity policy

To access these policies please visit: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

Point of Contact: Head of Clinical Practice

11. MANAGING ETHICAL ISSUES

11.1 The Vice Chancellor's Group has ultimate responsibility for the Ethical Policy. The process for considering any ethical issues which may fall out with the existing established procedures is as follows:

- > Approach is made to a member of UCO staff regarding an ethical consideration which falls under an existing policy or procedure.
- > The relevant Committee (i.e. fundraising ethical issues will go to the Fundraising Committee) will investigate the matter and refer to the Vice Chancellor's Group for comment and decision on any action to be taken.

12. REVIEW

12.1 This policy will be reviewed every three years or sooner if necessary, because of changes to legislation or related internal or external policy.