

ETHICS POLICY

The NFTS is committed to sound corporate governance and standards of integrity and ethical conduct as set out within the Seven principles of public life¹ (also known as the Nolan principles), which are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. This Policy sets out the ethical framework within which the School will conduct its affairs and with which all staff, students, governors and associates of the School will be expected to comply.

The policy rests also on the School's core values which are:

- To nurture, develop and challenge the individual voice of each student
- To support students to marry inspiration with skill
- To instill the value of collaboration and team work
- To encourage creative risk-taking
- To value process as much as outcome
- To ensure students reflect on the cultural impact of their work
- To promote diversity and equality of opportunity for all

Structure

This policy sets out an overarching structure of ethical behaviour and practice relating to core activities of the School, namely Governance, Learning, Teaching and the Student Experience, Research, Fundraising & Donations, Commercial Activity and Finance.

The School's Executive Team is responsible to the Board of Governors to keep this policy under review and to seek guidance from the Board where material ethical judgement may be required.

Note, it is not possible to give guidance on every eventuality which might occur. Therefore it is the responsibility of every individual in the School to exercise judgment (taking advice where necessary) and to take personal responsibility for their actions.

¹ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

General Standards of Ethical Behaviour

High ethical standards require constant attention and reinforcement so irrespective of the particular situation, our actions must at all times reflect accepted standards of ethical behaviour so that we will:

- Act in accordance with the law.
- Be open, truthful and honest.
- Treat everyone with dignity and respect, promoting equality, diversity and inclusivity.
- Have regard to ethical principles in all our decision-making.
- Declare conflicts of interest and manage them appropriately.
- Maintain strict confidentiality, as appropriate, with regard to personal data and any information which is commercially sensitive.
- Maintain the highest standards of academic integrity and independence.
- Be able to justify our conduct publicly if necessary.

Governance

The School is committed to the highest standards of corporate governance and accountability. It has adopted and follows The Higher Education Code of Governance² published by the Committee of University Chairs.

The Board commits to:

- Being unambiguously and collectively accountable for the School's activities, taking all final decisions on matters of fundamental concern within its remit.
- Protecting the School's institutional reputation by being assured that clear regulations, policies and procedures that adhere to legislative and regulatory requirements are in place, ethical in nature, and followed.
- Ensuring institutional sustainability by working with the Executive to set the institutional mission and strategy and that there are effective systems of control and risk management.
- Being assured that academic governance is effective.
- Being assured that effective control and due diligence takes place in relation to institutionally significant external activities.
- Promoting equality and diversity throughout the School.
- Ensuring that governance structures and processes are fit for purpose by referencing them against recognized standards of good practice.

Learning, Teaching and the Student Experience

We are committed to maintaining a high standard of learning and teaching, professional practice, and academic integrity amongst staff and students. We promote an inclusive learning environment based on mutual respect for diversity of opinion and individual expression and creativity.

We are committed to:

- Maintaining teaching excellence and quality in all our courses, ensuring the best possible student experience with fair and transparent assessment and

² <https://www.universitychairs.ac.uk/wp-content/uploads/2015/02/Code-Final.pdf>

- progression procedures.
- Ensuring that all students have access to high quality guidance and support arrangements.
 - Ensuring that all students understand their responsibilities to produce and present their work with academic integrity.
 - Ensuring that all students understand the value of respectful and empathetic collaboration.
 - Upholding the academic freedom and creativity of our staff and students to express, within the law, diverse or controversial opinions without fear of disadvantage.

Research, Innovation, and Knowledge Exchange

All Staff and students who undertake research, innovation, and knowledge exchange activity are expected to adhere to a basic code of ethics which follows the following principles:

- Behaving with integrity and professionalism, conducting research, innovation and knowledge exchange activity with integrity and transparency and to accurately present their data and research findings.
- Maximising benefit ensuring that we maximise the benefits of our work to the public as part of our obligation to research participants and scholarship.
- Being fair, respecting participants' anonymity, where appropriate, not coercing them, minimising any harm by protecting personal data and taking other measures to avoid distress, and avoiding discriminating against individuals or groups.

Fundraising & Donations

The School undertakes fundraising and accepts gifts and donations from persons and organisations in order to further its mission, aims and aspirations, within its charitable purpose. Guidance is provided within the School's Donations Policy, which must be followed to ensure that a high level of ethical standards apply.

Commercial Activity

The Finance & General Purpose Committee maintains oversight of ethical issues in relation to commercial income that may be contracted with prospective partners.

To this end:

- The Executive will seek approval from the Chair or Deputy Chair of the Board if there is any question that any prospective commercial income may put the reputation or brand of the School at risk, such as the provision of services to sanctioned countries.
- Where the Chair / Deputy Chair, F&GP or Board consider prospective commercial income may bring the School's reputation or brand at risk, such funds may be returned or contracts cancelled.

Finance (Investments & Procurement)

The School uses its funds in alignment with its charitable status and ethical principles. It is School policy that all staff, students and contractors working on behalf of the School conduct business without corrupt practice or acts of bribery to obtain an unfair advantage.

To this end:

- The School's Financial Regulations set out the key financial controls, policies and regulation which must be adhered to, to ensure that funds are properly managed and disbursed to support the activities for which they were provided.
- Investment decisions take account of ethical considerations.
- We highlight to our suppliers the School's Supplier Code of Conduct, which sets out the School's expectation with regards to ethics and integrity.
- We comply with the Modern Slavery Act 2015 in full.

The Ethics Advisory Group

The Board has established an Ethics Advisory Group to provide advice on matters arising from this policy and referred to it by the Board, its Committees or Senior Management. The (EAG) provides guidance on the ethical dimensions and implications of the school's activities, including arrangements for research, teaching and learning, including staff and student production projects, and commercial activities. In addition, the EAG will provide advice on other ethical matters, such as conflicts of interest; the giving and receipt of gifts and hospitality; donations and fundraising; responsible procurement; investment; and partnerships with external bodies or individuals.

Operation of the Policy

All staff, students, governors and associates are expected to familiarise themselves and comply with this policy. Failure to do so will be treated with the utmost seriousness by the School and could result in disciplinary action or other sanctions. This policy applies equally to the activities of any subsidiary company of the School.

The School's Executive Team is responsible to the Board of Governors to keep this policy under review and to seek guidance from the Board where material ethical judgement may be required.

Should you require any advice or further information on the matters above please contact the School's Director of Curriculum, Dr Mark Readman (mreadman@nfts.co.uk) in the first instance.

Approved by the Audit Committee November 2023

Appendix 1 Links to Supporting Policies

- [Academic Regulations](#)³
- [Admissions Policy](#)
- [Anti-bribery Policy](#)
- [Copyright and Intellectual Property Policy](#)
- [Data Protection Policy](#)
- [Donation Policy](#)
- [Equality, Diversity and Inclusion Strategy](#)
- [Financial Regulations](#)
- [Freedom of Information](#)
- [Freedom of Speech Policy and Code of Conduct](#)
- [Harassment, Bullying, and Sexual Misconduct Policy](#)
- Procurement Policy – see Financial Regulations
- [Public Interest Disclosure \(Whistle-blowing Policy\)](#)
- Staff Code of Conduct – see Employee Handbook
- [Student Code of Conduct](#)
- [Student complaints](#)
- [Student Misconduct Policy](#)
- [Supplier Code of Conduct](#)

³ Note, the School falls under the RCA's Academic Regulations for students registered on Master's courses of the School before 1 January 2023 only.