The
University
Of
Sheffield.

University
Secretary's
Office.

Council 14 October 2019

Annual Review of the Code of Ethics

Sponsor: President and Vice-Chancellor

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1. **Recommendations**

    (a)   Confirm that the Code does not require amendment (attached at Appendix 1)

    (b)   The University Secretary's Office to work with Corporate Communications to develop guidelines to support staff in identifying and making assessments about reputational risk, to include wider reputational risk.

    (c)   The University Secretary's Office to work with Corporate Communications to raise awareness of the Code of Ethics Guidance/Questions for staff in general and HoDs in particular.

    (c)   The register of interest maintained by the University Secretary for Council and UEB members be extended in scope to include Heads of Department, including Professional Services Directors.

    (d)   The University Secretary's Office to develop guidelines around perceived and potential conflicts of interest, to include illustrative examples and record keeping, for officers and committee members and to issue advice to committee secretaries and potential wider dissemination.

    (e)   Colleagues to advise the University Secretary's Office of changes to links to individual policies listed under the Code.

    (f)   The University Secretary's Office to work with the Vice-President for Research and Innovation to agree an approach to managing the potential reputational implications of subsidiary companies' activity.

2. **Introduction**

    In July 2017 Council approved a new University Code of Ethics to replace the previous "Framework for Decision-making Relating to Ethics and Reputational Risk" developed in response to recommendations made by a PwC internal audit report at the end of 2016.

    Monitoring, reporting and review of particular policies under the new Framework became the responsibility of the relevant functional service. To facilitate this the University Secretary was given responsibility for the effective operation of the Code of Ethics and for its annual review. In July 2018 the University Executive Board reviewed the operation of the overarching Code, including ensuring that the procedures and guidelines were current, publicised, and operating, and reported to Council, via Audit Committee, on the overall operation of the new Code and a review of its contents. The accepted recommendations from the 2018 annual review are attached (see Appendix 2) with an update on their completion/implementation.

This report presents the outcomes of the 2019 review of the Code.

3.   Process

Following the same approach taken for the 2018 review, in July 2019 the principal leads of areas identified in the Code (Education, Research, Fundraising, Finance) were asked the following five questions about the operation of the Code:

1. Are there any significant or material matters within your remit that have been dealt with under the Code or the underlying procedures for which you are responsible? If so please provide a summary.

2. Have you made any substantive changes to the policies and procedures within your remit? If so what are they, and why was the change necessary?

3. Please confirm that the links to the procedures listed on the website, and the documents to which they refer, are up to date?

4. Is there anything in the Code itself that needs updating, has been problematic or where you think amendment or improvement is needed?

5. Do you have any feedback on the usefulness of the revised series of questions we introduced last year to support Heads of Departments and others to navigate to the relevant policy or procedure and to consider the ethical and reputational risks associated with a given activity?

Where web links were found to have been out of date, these have been corrected.

4.   Findings

Key findings are set out below.

4.1   Significant or Material Matters:

No matters relating to the University's Financial Regulations or policies relating to Fraud, Bribery and Whistleblowing have triggered the Material Adverse Event reporting requirement for the OfS. A separate report to Audit Committee is made annually providing a reflection on the experiences of fraud (actual or attempted) and any uses of, or updates to, the Whistleblowing Policies. This is scheduled for the November 2019 Audit Committee meeting.

There have been a small number cases relating to research misconduct, these are reported to Senate though the Research Ethics Committee and annually to Council along with details of measures taken to ensure the University complies with the Concordat to support Research Integrity. In additional there have been two cases relating to allegations of plagiarism against former PGR students. The University cannot use the student disciplinary processes as the individuals are no longer students so a process has been developed to investigate these which effectively treats them as allegations of misconduct.

There have been a number of enquiries from UKRI about our research relationship with Huawei; to ensure the potential for reputational risk remains acceptable, new due diligence academic checks have been introduced for new academic collaborations.

4.2   Substantive changes to the underpinning policy and procedures:

Although a number of changes were notified to have been made or are in progress, these were largely operational in nature or in response to internal legislative and regulatory developments, for example the policies in relation to the Payment Card Industry Data Security Standard (PCIDSS) have been developed to ensure the University could demonstrate full compliance with the PCIDSS.

Feedback highlighted certain instances where further work may be necessary to

instigate or clarify processes and procedures which may result in future changes and additions. For example Research Data Management procedures are scheduled for review by the Open Access Advisory Group in the 2019/20 session, responsibility for PGR regulations is being changed and a brief statement on Sustainable Procurement will be provided when the University's Sustainability Strategy is fully developed. Where these are not changes to the Code itself they will need to be taken forward by the relevant Professional Service(s).

4.3   Suggested updates, amendments or improvements to the Code:

Conflicts of Interest: Conflicts of interest was an area highlighted as requiring further thought and development to increase awareness and understanding across the University of potential, perceived and actual conflicts of interest, including what these might look like, with greater emphasis on perceived and potential conflicts. It was also suggested that there needed to be improved transparency and recording in this area generally, to complement the work of the joint working group of HR and the Department of Finance, which was set up to look at conflicts of interest in in the workplace (personal relationships).

Recommendation: The University Secretary's Office to develop guidelines around perceived and potential conflicts of interest, to include illustrative examples and record keeping, for officers and committee members and to issue advise to committee secretaries. The University Secretary's Office will link in with the HR/Finance group to ensure outcomes align.

Recommendation: It is proposed that the register of interest maintained by the University Secretary for Council and UEB members be extended in scope to include Heads of Department, including Professional Services Directors.

4.4   Guidance for HoDs:

In 2018-19 guidance was reintroduced as part for Heads of Departments to guide their application of the Code and its supporting policies and to consider the ethical and reputational risks associated with a given activity. This was felt to be a worthwhile addition that may help to raise awareness, prompt wider thinking about ethical issues, and facilitate the Code being applied consistently.

A revised set of questions was developed and this was appended to the Code for uses by Heads of Departments and Professional Services colleagues acting together (see Appendix 3). Professional Services leads were asked to inform the University Secretary's Office where use of the checklist or wider application of the Code of Ethics had meant that activity has not proceeded or had been stopped; there have been no reported cases during 2018-19. Although this may be because the questions and awareness of the Code are guiding decisions at an earlier stage it is also possible that the questions are being underutilised and/or applied inconsistently due to a lack of awareness of the guidance.

Feedback on the usefulness of the revised questions highlighted a potential lack of consideration and/or lack of understanding of perceived or actual wider reputational risk when making assessments about an activity or research project. This linked to similar feedback highlighting the challenges for both the person identifying reputational risk and those called on to assess whether the risk is acceptable, for example where senior academics were making assessments about activities that may not be in his/her own specialist research field not perceiving the area to be a risk within the context of the discipline.

Recommendation: The University Secretary's Office to work with Corporate Communications to further develop the guidelines to support staff in identifying and

making assessments about reputational risk, to include wider reputational risk

Recommendation: The University Secretary's Office to work with Corporate Communications to raise awareness of the Guidance for HoDs.

4.5 Provenance of Historical Donations

In August 2019 the University received an enquiry from a publication called The Africa Report which is working on a story about how Universities are reviewing their lists of historical donors to establish if these people benefited from links to the slave trade. The UoS (which was established in 1905, 72 years after the Slavery Abolition Act of 1833 abolished slavery throughout the British Empire) is not aware of historical donations from people who may have profited from slavery and there are no current plans to review our historical lists of donors.

In May 2019 UEB approved a Heritage Collections Strategy and noted that relevant policies and procedures would fall under the Code of Ethics. A Heritage Acquisitions and Disposals Policy is in development and appropriate reference to will be added to the Code when this is finalised.

4.6 Ethics Committee

In its response to the OfS, De Montfort University (DMU) reported that it had re-constituted its Ethics Committee to take a lead role in University-wide ethics issues. TUoS has a clear 'Code of Ethics,' supported by specific policies, which is reviewed annually by the University Secretary and relevant officers, reporting to UEB and Council. Senate Research Ethics Committee promotes awareness and understanding of ethical policy governing research. While it may be necessary to raise awareness of the framework, it is practical and based on feedback it does seem to work. It is not proposed to constitute a general Ethics Committee.

Recommendation: The University Secretary's Office to work with Corporate Communications to raise awareness of the Code of Ethics Guidance/Questions for staff, including AMRC, in general and HoDs in particular, e.g. through induction.

4.7 Subsidiary Companies

A further concern has been raised in connection with the potential for reputational damage due to the University due to the nature of activity or business in wholly University-owned subsidiary companies. The Vice-President for Research and Innovation is leading work to ensure that the University is able to manage and mitigate any such risks.

Recommendation: The University Secretary's Office to work with the Vice-President for Research and Innovation to agree an approach to managing the potential reputational implications of subsidiary companies' activity.

5.   Follow-up action

Web pages will be updated and any changes to the Code communicated to relevant staff.

This report will be submitted to Council on 14 October and Audit Committee on 18 November alongside any proposed amendments to the Code, for Council approval.

September 2019

The University of Sheffield
Code of Ethics

A - Ethical Guiding Principles

The values of the University, expressed in our Charter and Statutes and re-affirmed in the Mission, Vision and Identity included in the institutional Strategic Plan, commit us to the highest standards of ethical conduct. To support this commitment we have developed a number of guiding principles as a reference point for ethical decision making, namely that the University and individual members of staff will:
- Behave with independence, consistency, honesty and transparency in all our activities.
- Carry out research and scholarship of a quality which commands the respect of academic peers, which is open to testing and refutation, and which is undertaken in an ethical and legal manner.
- Defend and promote the freedom to pursue, advance, and disseminate knowledge and ideas.
- Test received wisdom, examine evidence critically, consider and evaluate all opinions, beliefs and arguments with respect.
- Award degrees based on merit.
- Act in accordance with our Charter and Statutes and our Charitable objects

Ethics refer to the standards of behaviour that the University and individual members of staff apply in decision-making and action in the course of their day-to-day activities. Like other sectors, personal and corporate ethics inform and underpin the regulatory and codified regimes applicable to higher education institutions. The Seven Principles of Public Life (the ethical standards expected of holders of public office, including members of university governing bodies) are a useful guide to ethical behaviour:
https://www.gov.uk/government/publications/the-7-principles-of-public-life

Personal Ethics

Unethical personal behaviour by an individual is unacceptable. While the law can establish what behaviour is right and wrong, unethical behaviour is also determined by social attitudes of morality and good conduct. Ethical behaviour helps to build trust, and in the context of the University is associated with individuals acting with integrity and transparency. Unethical behaviour is commonly associated with selfishness, seeking personal satisfaction and the fulfilment of personal objectives (to the detriment of colleagues, the University itself, or third party individuals or organisations).

Organisational ("Corporate") Ethics

Corporate ethics are standards of behaviour expected of the University, which affects its relationships with staff, students and partners, as well as with funders and regulators, the region and society as a whole. These standards relate primarily to the Code's guiding principles and support the University's Mission, Vision and Identity. They provide an institutional context within which individual staff can ensure that their personal behaviour is ethical in support of the collective achievement of the University's strategic and charitable objectives.

Professional Ethics

Many professions, such as medicine, law and other chartered occupations, are governed by professional bodies that require members to act in accordance with certain professional standards, including ethics. Staff (and students) holding or seeking professional accreditation should also have regard to the standards of conduct expected and required by their respective professional body. Many of these will be the same or similar as other 'personal' ethics and may include principles of independence, confidentiality and selflessness, as well as honesty and integrity.

This Code is designed to provide an overarching guide to ethical conduct, with reference to practical application in four broad areas of University activity: **education** (including student recruitment & admissions, teaching partnerships and awards); **research** (including research partnerships); **fundraising**; and **finance**.

Appendix 1 to this Code sets out a series of guiding questions for Heads of Department to use with a relevant Professional Services Director to help evaluate any ethical issues around a particular decision, e.g. associated any reputational risk.

B - Policies and Procedures

The University deliberately does not attempt to set out a pre-determined list of 'ethical' or 'non-ethical' activities. Rather, we have established mechanisms by which informed decisions can be taken on matters relating to ethics (and the associated risks) on a case-by-case basis, within the appropriate policy or procedural context.

In the following paragraphs you will find links to the most relevant policies, procedures and guidance in respect of the four broad areas referred to above.

Also included are points of contact in the case of any further queries.

1. Education
When considering ethical matters relating to education, including admissions, teaching partnerships, and awards, relevant procedures are the following:

- Processes and Policies related to Learning and Teaching
  http://www.sheffield.ac.uk/lets/pp
- Student Admissions Policy https://www.sheffield.ac.uk/study/policies/admissions
- University Framework for Collaborative Provision
  http://www.sheffield.ac.uk/lets/pp/qa/collab
- Equality and Diversity Policies and Procedures
  http://www.sheffield.ac.uk/ssid/equality-and-diversity/policies-and-procedures/index
- Principles of Engaged Learning and Teaching
  https://www.sheffield.ac.uk/staff/learning-teaching/our-approach/current/engaged/principles
- Guidance for Students on the Use of Unfair Means
  http://www.sheffield.ac.uk/ssid/exams/plagiarism
- Code of Practice relating to Meetings and Other Activities on University Premises
  http://www.sheffield.ac.uk/calendar

- https://www.sheffield.ac.uk/polopoly_fs/1.784294!/file/StudentCodeOfConduct_May 2018.pdf
- Regulations relating to students, including examinations & awards, discipline, and computing http://www.sheffield.ac.uk/calendar
- Information Security Policies http://www.sheffield.ac.uk/cics/policies/infosec
- Our Commitment (a statement of partnership between students and teachers Safeguarding Policy and associated procedures http://www.sheffield.ac.uk/ssd/safeguarding
- Honorary Degrees Process and Procedures (including guidance on process, deadlines and meetings details) http://www.sheffield.ac.uk/govern/committees/hondegs

Please contact the Director of Academic Programmes and Student Engagement if there are questions which
cannot be addressed through the policies and procedures set out above.

2. Research
When considering ethical matters concerning research, knowledge exchange and related partnerships, relevant procedures are the following:

- Policy on Good Research and Innovation Practices http://www.sheffield.ac.uk/polopoly_fs/1.588399!/file/GRIPPolicyUpdateJun16.pdf
- Policies and Procedures relating to Research Integrity and Ethics http://www.sheffield.ac.uk/ris/other/gov-ethics/index
- Guidance on Export Control Legislation - http://www.sheffield.ac.uk/ris/export
- Guidance on Conflicts of Interest http://www.sheffield.ac.uk/hr/guidance/contracts/conflictsofinterest
- University research misconduct toolkit https://www.sheffield.ac.uk/hr/guidance/academicstaff/researchmisconduct
- Guidance on Intellectual Property: http://www.sheffield.ac.uk/hr/az/patent
- University Research Governance Procedure (relating to human-interventional studies) https://www.sheffield.ac.uk/rs/ethicsandintegrity/governance
- Ethical Policy on Use of Animals in Research https://www.sheffield.ac.uk/rs/ethicsandintegrity/animal-research/index
- Research Data Management Procedures http://www.sheffield.ac.uk/library/rdm/index
- Guidance on Collaborative Research https://www.sheffield.ac.uk/rs/ethicsandintegrity/collaborative-research
- Regulations relating to research students, including examinations & awards, discipline, and computing http://www.sheffield.ac.uk/calendar
- Information Security Policies http://www.sheffield.ac.uk/cics/policies/infosec

Please contact the Director of Research Services if there are questions which
cannot be addressed through the policies and procedures set out above.

3. Fundraising
When considering ethical matters concerning fundraising, gifts and hospitality, relevant procedures are the following:

- Charitable Fundraising Information relating to the University of Sheffield http://www.sheffield.ac.uk/alumni/donate/charity

- Financial Regulations relating to Donations, Bequests and Legacies; and also Gifts and Hospitality http://www.sheffield.ac.uk/finance/regulations/appendices
- Fundraising Guidelines http://www.sheffield.ac.uk/alumni/donate/fundraising/fundraise-for-us
- Donation Acceptance Policy www.sheffield.ac.uk/alumni/staff/fundraising/donations
- Policy Statement on Conflicts of Interest http://www.sheffield.ac.uk/hr/guidance/contracts/conflictsofinterest
- Fraud, Bribery and Whistleblowing Policies http://www.sheffield.ac.uk/finance/staff-information/howfinanceworks/fraud_and_whistle_blowing

Please contact the Director of Advancement if there are questions which cannot be addressed through the policies and procedures set out above.

4. Finance

When considering ethical matters concerning finance, relevant procedures are the following:

- Charitable Governance Information http://www.sheffield.ac.uk/about/charitable-status
- University Financial Control and Governance arrangements, including the role of Audit Committee and Serious Incident Reporting http://www.sheffield.ac.uk/finance/staff-information/howfinanceworks/index
- Financial Regulations http://www.sheffield.ac.uk/finance/regulations
- Endowment Investment Policy http://www.sheffield.ac.uk/polopoly_fs/1.535289!/file/University-Endowment-Investment-Policy_web-version.pdf
- Statement on Sustainable Procurement http://www.sheffield.ac.uk/finance/staff-information/help/procurement/why/sustainable_procurement
- Terms and conditions for supply of goods and services http://www.sheffield.ac.uk/procurement/suppliers-information
- Policies relating to compliance with the Payment Card Industry Data Security Standard http://www.sheffield.ac.uk/cics/policies/pcidss
- University Policy Statement on Conflicts of Interest http://www.sheffield.ac.uk/hr/guidance/contracts/conflictsofinterest
- Fraud, Bribery and Whistleblowing Policies http://www.sheffield.ac.uk/finance/staff-information/howfinanceworks/fraud_and_whistle_blowing
- Guidance on the Application of Financial and Trade Sanctions http://www.sheffield.ac.uk/polopoly_fs/1.467117!/file/Guidance_on_the_application_of_Sanctions.pdf
- Guidance on Facilitation Payments and the Bribery Act http://www.sheffield.ac.uk/polopoly_fs/1.194148!/file/Facilitation_payments_and_the_UK_Bribery_Act.pdf

Please contact the Director of Finance if there are questions which cannot be addressed through the policies and procedures set out above.

C - Publication, Monitoring, Reporting and Review

This Code of Ethics was first approved in July 2017. The Code will continue to be publicised within the University and will be available on the University website. It will be drawn to the attention of new members of staff and new heads of department.

The Code is supplemented by a series of ten questions which Heads of Departments and relevant Professional Services Directors are asked to consider in respect of any new activity or changed circumstances. These questions are intended to support HoDs and Professional Services Directors to consider the ethical and reputational risks associated with a given activity.

Breaches of relevant policy and procedures may result in disciplinary action.

The University's Public Interest Disclosure (Whistleblowing) Policy provides a means for any individual to raise matters of concern as regards malpractice, impropriety or wrongdoing http://www.sheffield.ac.uk/hr/guidance/contracts/pid

The policies and procedures referred to in section B above are subject to monitoring, reporting and review by those responsible for oversight in each case. By way of example, regular reports on matters regarding teaching partnerships are made by the Committee for Collaborative Provision to the Learning and Teaching Committee of the Senate; the Research Ethics Committee reports regularly on its work to the Senate; the Honorary Degrees Committee reports on its deliberations during each academic year to the Senate and to the Council.   The University Secretary has responsibility for ethical matters and effective operation of the University's framework for decision making on ethical matters.

Alongside these specific reporting arrangements, the University Executive Board will review the operation of this overarching Code, including ensuring that the various related policies, procedures and guidelines are current, publicised, and operating, and will report to Council, via its Audit Committee. The first such review will took place in 2018.

October 2018

The University Of Sheffield.

University Secretary's Office.

Recommendations from the 2018 Annual Review of the Code of Ethics

		Recommendations
	(a)	Approve the proposed amendments to the Code (as attached) Closed - Implemented
	(b	Endorse the introduction of a supporting 'checklist' for HoDs and related guidance about how this should be used. Closed – Implemented
	(c)	The University Secretary's Office to co-ordinate a shared review (with Research Services, Global Engagement, Academic Services, Partnerships and Regional Engagement and Finance) to propose to UEB a common approach to undertaking, reporting/recording and sharing the results of due diligence checks on potential external partners and a mechanism for this to be regularly reviewed. Ongoing – A working group (also including DARE and the Library) is finalising proposals and will bring forward recommendations to UEB shortly.
	(d)	To consider the Whistleblowing Policy being owned by and disclosures which meet the PIDA criteria being directed to the University Secretary as per the UK Corporate Governance Code, while retaining HR as the first point of reference. Closed – The Whistleblowing Policy was reviewed and updated to, amongst other things, include clarification of the role of the Chair of Audit and University Secretary in relation to disclosures. Approved by Council
	(e)	The University Secretary's Office to review the due diligence around fit and proper persons and conflicts of interest for offices and committee memberships and to issue advice to committee secretaries. Closed - Covered at Committee Secretaries Events and Guidance in 2018/19.
	(f)	Colleagues to advise the University Secretary's office of changes to links to individual policies listed the Code. Closed – Implemented

(Teaching Partnerships, Research and Research Partnerships, Student Recruitment, Accepting Donations)

Questions for Professional Services Directors and Head of Department **in respect of new activity and/or where there has been a change in circumstances or new information becomes known in areas of policy and process listed in the University Code of Ethics (e.g. Student Recruitment, Teaching and Research Partnerships, Fundraising and Accepting Donations)**

The guiding principles expressed in the Code of Ethics should serve as an institutional reference point and Heads of Department should discuss the questions with the relevant lead Professional Service(s) to inform their decision.

These questions are designed to aid Heads of Department in considering the ethical and reputational risks associated with activities undertaken in their Department and should be completed in conjunction with a relevant Professional Services Director as appropriate to the specific activity under consideration.

Questions		Answers: Yes/No and/or commentary, as appropriate.
Q1	*In making decisions about University activity in the context of the Code of Ethics, it is important that the consideration pathways associated with our primary purpose and commercial activities are properly understood. Those activities deemed as 'commercial' are more likely to be viewed as 'investment' decisions and have different implications under law. Should the answer to the following question be 'no', please seek advice from your nominated Professional Services Director (see below) or the Department of Finance.* Is the purpose of the proposed activity/action for all parties involved the advancement of education through research and teaching to deliver public benefit? More information can be found http://www.charitycommission.gov.uk/detailed-guidance/charitable-purposes-and-public- benefit/guidance-on-charitable-purposes	
Q2	Does the proposed activity/donation create conflicts of interest or place obligations on the University that run contrary to: • the University's Charitable status; • the Code's *Guiding Principles;* or • the terms and conditions of funding bodies. Further information about Conflicts of Interest is shown in paragraph 25 of the University's Financial Regulations and the University Policy Statement on Conflicts of Interest.	.

Q3	On consideration of the benefits and disadvantages of the proposed activity, would proceeding create reputational risk that could significantly impact upon the University?	
	Should you require assistance with the questions below, please contact the relevant Professional Services Director.	
Q4	Are there any issues that might cause concern in respect of the following: · Links to other countries or governments or representatives thereof, whose reputations might damage that of the University · Links to other countries or governments or representatives thereof who appear on the list of United Nations or European Union Sanctioned or Embargoed Countries. · Ethical codes of practice, e.g., activity that flouts accepted government or industry ethical codes of practice · Proposed activities which are contrary to the Office for Students' Public Interest Governance Principles: https://www.officeforstudents.org.uk/advice-and-guidance/regulation/public-interest-governance-principles/ · Proposed activity that would be a 'reportable event' as defined by the OfS, (see p128: https://www.officeforstudents.org.uk/media/1406/ofs2018_01.pdf) or 'material adverse events' (previously defined by HEFCE as 'serious incidents') · Proposed activities which run contrary to our Social Responsibility and Sustainability agenda https://www.sheffield.ac.uk/about/sustainability · Violations of human rights · Existing or potential media coverage *Guidance may be sought from UK Govt Foreign and Commonwealth Office:* *UK Trade and Industry: Overseas Business Risk/Political and Economic Updates* · https://www.gov.uk/government/collections/overseas-business-risk	

Q5	Does the external party have any current known links with the University, e.g., students, family, other funding, senior positions within or aligned with the University, e.g., Council member? *Any pre-existing links between anyone at the University and any representative of the organisations concerned should be declared. Any gifts or hospitality given or received from these organisations should be clearly documented. This is particularly important where the funding of student fees is concerned. In this regard it will be important for academic departments to declare whether or not they are aware of any family or other relationship between the student, any representative of the funding organisation and any member of staff at the University.*	
Q6	If the activity is contractual or otherwise involved a financial transaction, have financial checks been undertaken, including credit checks. If so, do they represent any risks or potential issues? (see Paragraph 9.8 of the Financial Regulations)	
Q7	What is the identity of the individual/organisation providing the funding and/or proposing the relationship? Does their identity present any actual or potential reputational issues?	
Q8	Have references been taken up, e.g. from the proposed counter-parties or partners? If so, do they represent any issues or risks, e.g. reputational, financial? Existing institutional knowledge: Does your department or any other department or Professional Service that you know of have any existing connection with the proposed partner?	

Q9	Does the organisation have publicy available policies about Bribery?.	
	What advice have you sought from the Finance Department or HR regarding potential conflicts, for example under the 'Proceeds of Crime Act', the 'Bribery Act', Criminal Finances Act and other anti-terrorism finance legislation?	
	For further information and assistance contact:	
	Helen Dingle, Chief Financial Officer, or Andrew Cattermole, Management Accountant.	
	Have any actual or potential issues been identified?	
	Note: It is important that we understand the legal status of the organisations concerned and whether it is clear (from their websites or other official published material) how they are funded and what they list as their primary purpose. This should help in providing assurance whether or not there is any risk of the funds we receive being generated from acts of crime, terrorism or money laundering (as well as helping to address the question of charitable of purposes at question 1). The acid test is to be clear on the full name and address to which our invoice will be sent. Any request to send an invoice "care of" or via a Third Party should be rejected as this then removes the transparency we need.	
Q10	In respect of overseas partnerships for the purposes of student education, are there any factors within the overseas country which would represent risk to the security of staff and students?	
	https://www.gov.uk/foreign-travel-advice	
	If the partnership will involve University staff working in the overseas country, advice on the financial implications of this must be sought from the Tax Team in the Finance Department before any arrangements are confirmed.	

Recommended course of action following discussion with relevant Professional Services Director:

1.   Recommend that the University should proceed *without* the need for a prepared Corporate Communications statement

2.   Recommend that the University should proceed *with* the requirement for a prepared Corporate Communications statement

3.   Recommend that the University should not proceed. If so please advise the University Secretary's Office (contact details) for recording and monitoring purposes.

Recommended course of action: ………………………………………………………………………………………………..

Name of Head of Academic Department: ………………………………………………………………………………………………

Name of Professional Services Director owner……………………………………………………………

Date: ……………………………………………………………