



## UKMC Conduct and Ethical Integrity Policy

Date	Author	Summary of Changes	Version	Authorised
12/12/2025	Director of Academic Quality	Realignment with processed student protection	1	Academic Board December 2025

### Policy/Procedure Management and Responsibilities

Policy/Procedure Owner	The policy is owned by the Head of Wellbeing and supported by the Finance Department.
Equality Analysis	Academic Board
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Linked Documents Internal	
Dissemination Plan	This document will be distributed through the academic departments and stakeholders of programme design, approval, monitoring or termination.
Accessibility	<b>Alternative formats available on request</b> contact <a href="mailto:Quality@ukmc.ac.uk">Quality@ukmc.ac.uk</a>

# ANNEX A – CONDUCT AND ETHICAL INTEGRITY POLICY

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## 1 PURPOSE AND SCOPE

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This policy sets out the behavioural, ethical and professional standards expected of all members of the UK Management College (UKMC) community.

It provides a single, integrated statement of conduct and ethical integrity, bringing together the principles that guide professional behaviour, responsible decision-making and the maintenance of trust in all institutional activities.

The purpose of the policy is to ensure that everyone representing UKMC acts lawfully, responsibly and in a manner that upholds the College's reputation, protects public and student confidence, and reflects its commitment to transparency, accountability and ethical governance.

This policy applies to all employees (permanent, temporary, full-time, part-time and visiting), members of the Board of Directors, the Executive Board, the Academic Board and all subsidiary committees. It also applies to contractors, agents, consultants and partners engaged in College activities. Compliance with this policy is a condition of employment and partnership, requiring individuals to exercise sound judgement, act in good faith and conduct themselves in a way that maintains confidence in the institution.

This policy operates alongside other internal College policies, including those relating to equality, safeguarding, data protection, whistleblowing and financial integrity. While those documents provide additional detail on specific areas of responsibility, this policy sets out the overarching standards of conduct and ethical integrity expected of everyone acting for or on behalf of UKMC.

## 2 ETHICAL PRINCIPLES AND VALUES

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UKMC's ethical foundations are grounded in the core values of **integrity, inclusivity, accountability, professionalism and social responsibility**. These values guide the behaviour of all staff, governors, contractors and partners, shaping a professional culture based on trust, fairness and respect.

**Integrity** requires individuals to act honestly, avoid conflicts of interest and maintain public confidence in the College's work.

**Inclusivity** ensures that every member of the community is treated with dignity and respect, and that the diversity and experiences of staff and students are valued.

**Accountability** requires individuals to take responsibility for their actions, comply with established policies and procedures, and demonstrate openness in decision-making.

**Professionalism** demands competence, diligence and courtesy in all interactions, ensuring that staff uphold the reputation of the College in both internal and external contexts.

**Social responsibility** reflects the College's commitment to contributing positively to the wider community through lawful, ethical and transparent conduct.

These values underpin the College's expectations of behaviour and provide the ethical basis for all decisions and actions. They apply in all circumstances, whether onsite, offsite, online or when representing the College in a public or professional capacity.

### **3 PROFESSIONAL CONDUCT EXPECTATIONS**

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All members of the UKMC community are expected to uphold high standards of personal and professional behaviour that reflect the College's values and maintain trust in its work. These expectations apply in all settings where individuals act on behalf of the College, whether on campus, online, during partnership activity or in public forums.

#### **3.1 PROFESSIONAL BEHAVIOUR AND STANDARDS**

Staff must conduct themselves in a manner that promotes confidence in the College. This includes being punctual, reliable and prepared for duties; completing work to appropriate professional standards; and responding constructively to feedback and oversight. Staff must always maintain appropriate professional boundaries with students and colleagues.

#### **3.2 RESPECT, DIGNITY AND INCLUSION**

All individuals are expected to treat others with courtesy, fairness and respect. Behaviour that constitutes discrimination, bullying, harassment, victimisation or intimidation is strictly prohibited. Staff must contribute to an environment in which diversity is valued and where all members of the community feel safe and supported.

#### **3.3 RESPONSIBLE USE OF COLLEGE SYSTEMS, RESOURCES AND INFORMATION**

College resources—including IT systems, equipment, data, intellectual property and communication tools—must be used responsibly and only for lawful and authorised purposes. Staff must not misuse institutional property, falsify information or access systems without permission. Confidential information must be protected and handled in line with data protection requirements and College policies.

#### **3.4 COMMUNICATION AND REPRESENTATION**

Employees must communicate professionally in all written, verbal and digital interactions. When using social media or other public platforms, individuals must

ensure that their conduct does not damage the reputation of the College, breach confidentiality or undermine public trust. Personal views should not be presented as official UKMC positions unless expressly authorised.

### **3.5 CONFLICTS OF INTEREST AND PERSONAL CONDUCT**

Staff must avoid situations where personal, financial or other interests could influence, or be perceived to influence, their professional responsibilities. Any potential or actual conflict must be declared promptly in accordance with internal procedures. Staff must act impartially, transparently and in a way that maintains confidence in institutional decision-making.

### **3.6 FITNESS FOR DUTY**

Staff are expected to be fit to carry out their duties safely and effectively. Behaviour that impairs judgement or performance—including the misuse of alcohol or drugs while on duty or representing the College—is not acceptable and may result in disciplinary action.

### **3.7 MISCONDUCT AND GROSS MISCONDUCT**

Behaviour that breaches this policy, or any other internal policy, may amount to misconduct or gross misconduct. Examples include but are not limited to: dishonesty; harassment; misuse of College systems or information; unauthorised disclosure of confidential data; and conduct that brings the College into disrepute. Serious breaches may result in disciplinary action up to and including dismissal.

## **4 ANTI-BRIBERY AND CORRUPTION**

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UKMC is committed to maintaining the highest standards of ethical conduct in all of its operations. As part of this commitment, the College adopts a strict zero-tolerance approach to bribery and corruption.

UKMC adopts a strict zero-tolerance approach to bribery and corruption in all of its activities. All staff, governors, contractors and partners acting on behalf of the College must comply with the Bribery Act 2010 and uphold the highest standards of honesty, fairness and transparency.

Bribery includes offering, giving, requesting or receiving any financial or other advantage with the intention of inducing improper performance or securing an undue benefit. Corruption is the abuse of entrusted power for personal or organisational gain. Both are prohibited under this policy.

Individuals must not:

- offer, promise or give a bribe.
- request, agree to receive or accept a bribe.
- engage in any activity that could be perceived as seeking an improper advantage; or
- permit third parties acting for the College to behave improperly on its behalf.

Staff involved in procurement, recruitment, partnership development, marketing, and student recruitment must take particular care to ensure their actions are ethical, impartial and properly documented. Any gift, payment, hospitality or benefit that could influence, or appear to influence, decision-making must be declined or declared in line with internal procedures.

Concerns or suspicions about bribery or improper conduct must be reported immediately to a line manager or the designated senior officer responsible for integrity matters. Reports made in good faith will be treated confidentially, and individuals will be protected from victimisation or retaliation.

Further guidance on financial conduct, money-laundering risks, and related reporting procedures is set out in Annex B – Financial Integrity and Anti-Money-Laundering Policy and Annex C – Fraud and Audit Assurance Policy.

Breaches of this policy may constitute gross misconduct and could result in disciplinary action, termination of employment or partnership, and referral to external authorities where required.

## **5 CONFLICTS OF INTEREST, GIFTS AND HOSPITALITY**

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All staff, governors and representatives of UKMC must act impartially and in the best interests of the College. A conflict of interest arises when personal, financial or other external considerations have the potential to influence, or be perceived to influence, professional judgement or decision-making.

Individuals must take reasonable steps to avoid situations in which conflicts occur and must declare any actual, potential or perceived conflict as soon as it arises. Declarations should be made in accordance with internal College procedures so that appropriate mitigation can be agreed and recorded. All declared interests are recorded in the College's Register of Interests, maintained by the Governance and Compliance Office.

Gifts, hospitality or other benefits offered in connection with college duties must be approached with caution. Staff must not solicit or accept any gift, advantage or hospitality that could influence, or appear to influence, their decisions or actions. Modest or customary hospitality may be acceptable where it is proportionate and transparently declared, but anything that creates a sense of obligation or could compromise impartiality must be declined.

Offering gifts or hospitality on behalf of the College must be reasonable, infrequent and justifiable, and must never be used to secure an improper advantage. Where uncertainty exists, advice should be sought from a line manager or the relevant senior officer before accepting or offering anything of value.

Failure to declare conflicts or the improper giving or receiving of gifts or hospitality may constitute misconduct and may result in disciplinary action.

## **6 REPORTING CONCERNS AND BREACHES**

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UKMC expects all staff and representatives to take responsibility for raising concerns about behaviour or actions that may breach this policy or undermine the integrity of the College. Concerns may relate to unethical conduct, suspected fraud or bribery, discrimination, harassment, misuse of resources, or any behaviour inconsistent with the College's values.

In most cases, concerns should be raised with the individual's line manager. Where this is not appropriate, concerns may be directed to the relevant senior manager, Human Resources, or the designated officer responsible for integrity and compliance matters. Staff may also make a disclosure under the College's whistleblowing or public interest disclosure policy.

Reports made in good faith will be treated sensitively and, where possible, confidentially. UKMC does not tolerate retaliation, disadvantage or victimisation against any individual who raises a concern honestly and reasonably.

Concerns relating specifically to financial irregularity, fraud or money-laundering must also be reported in accordance with the procedures in Annex C Fraud and Audit Assurance Policy.

Breaches of this policy may result in disciplinary action under the College's staff conduct procedures and, where necessary, referral to external authorities.

## **7 MONITORING, ACCOUNTABILITY AND POLICY REVIEW**

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Responsibility for promoting and upholding this policy is shared across the College. Line managers, senior staff and governance officers are expected to ensure that their teams understand the standards set out in this document and apply them consistently in their day-to-day work.

The College monitors adherence to this policy through routine management oversight, internal assurance processes and the outcomes of relevant HR or compliance procedures. Trends or concerns arising from these activities may be used to inform further training, policy updates or organisational improvements.

This policy is reviewed periodically to ensure it remains accurate, relevant and reflective of the College's values and legal obligations. Updates are normally considered through the appropriate governance channels and communicated to staff once approved.

The Governance and Compliance Office provides oversight of policy adherence and supports managers in ensuring consistent application across the institution.

## **8 CONCLUSION**

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This policy sets out the standards of conduct and ethical integrity expected of all those who work for, or on behalf of, UKMC. By upholding these principles, staff and representatives contribute to a professional, respectful and trustworthy environment that supports the College's mission and serves the best interests of its students and wider community. This policy forms part of the College's wider governance and assurance framework, and should be read alongside the related annexes that provide further detail on financial integrity, fraud response and committee oversight.