

General Policy

G01 Code of Conduct

1. Policy Statement

This Code of Conduct affirms that SAE Institute, through all its operation in campuses in Europe, in any Licenced territories and in all campuses offering programmes or operations in collaboration with Middlesex University, expects that all staff, students, Directors, Officers and appointed members employed by or acting on behalf of the Institute will adhere to the highest standards of professional conduct.

2. Purpose

All categories of staff and students in programmes of the Institute are expected to carry out their work in an ethical and collegial manner, to perform their duties with efficiency, fairness, impartiality and honesty, and to comply with the provisions of this Code. Compliance with this Code will foster and maintain student, staff, and public trust and confidence in the integrity and professionalism of the Institute, and will enhance the public standing of SAE Institute as a high quality education provider. Staff are expected to promote and protect the interests of SAE Institute and to maintain and enhance its reputation at all times.

3. Scope

This policy applies in the context of all SAE Institute operations in Europe, Licenced territories and campuses offering programmes or operations in collaboration with Middlesex University. It is applicable to all staff, officers and persons holding appointments with or employed by SAE Institute in any capacity at all campuses and branch campuses, and all students enrolled with or prospective students of SAE Institute irrespective of their place of residence, campus or mode of study.

This Code should be read in conjunction with the approved policies of the Institute. Failure to abide by the provisions of this code or approved policies of the Institute may lead to disciplinary proceedings, and in severe cases, the termination of employment.

4. Associated Policies and Procedures

This Code should be read in conjunction with the full range of approved policies and rules of SAE Institute, and with the relevant local, national or applicable regional legislation, as appropriate and amended from time to time, including but not limited to legislation relating to:

- Anti-Discrimination
- Child Protection
- Copyright
- Disability Discrimination

- Equal Opportunity for Women in the Workplace
- Human Rights and Equal Opportunities
- Occupational Health and Safety Regulations
- Privacy and Personal Information Protection Act
- Racial Discrimination
- Sex Discrimination.

5. Policy

5.1. Respect for Law and Governance

Staff and students of the Institute are required to observe and comply with all relevant laws, statutes, approved policies, procedures, prescribed requirements and published rules of the Institute.

5.2. Professional Conduct

For staff, the professional conduct required by the Institute includes, but is not limited to:

- a) A commitment to professional standards in teaching and learning, research, administration and industry involvement;
- b) Observance and promotion of the rights of students and other staff, including professional respect in all Institute activities;
- c) Conduct which is professional at all times, and which has regard to the interests of the Institute and the interests of students and staff;
- d) Awareness of relevant legislation and adherence to policies and procedures developed by the Institute.

For students, the professional conduct required by the Institute includes, but is not limited to:

- a) A commitment to learning, appropriate methods of research, and appropriate behaviour at all times while on the Institute's premises or elsewhere as a student;
- b) Recognition and observance of the rights of fellow students and staff;
- c) Conduct which is fair and has regard to the Institute interests;
- d) Awareness of relevant legislation and adherence to policies and procedures developed by the Institute.

In conjunction with this code, students should also read, familiarise themselves with, and abide by the provisions of the Academic and General Polices which apply to students.

5.3. Academic Freedom

The Institute shall:

- a) Promote academic freedom of both inquiry and expression provided such inquiry and expression does not contravene applicable legislation (such as defamation and privacy laws) and provided that if disputes arise, the provisions of this code and any relevant procedures are observed;
- b) Encourage students and staff to express themselves using critical judgement and scholarship, subject to confidentiality obligations placed upon them by any privacy and research obligations;
- c) Encourage officers and employees to express themselves using critical judgement and scholarship, subject to confidentiality obligations placed upon them by the Institute either through defamation or privacy laws, policy or under the terms of their contracts of employment.

5.4. Respect for Individuals

All staff and students of the Institute shall treat other members of staff and students as well as visitors and members of the community with respect, courtesy, fairness and equity. This involves, but is not limited to:

- a) Fairness in supervising and dealing with students and staff;
- b) Carrying out work with integrity and objectivity;
- c) Making decisions that are procedurally fair;
- d) A client-centred approach to work;
- e) Avoiding unlawful discrimination, for example on grounds such as: gender, sexual orientation, race, cultural background, religion, or political conviction;
- f) Avoiding behaviour which might reasonably be perceived as corruption, harassment, bullying or intimidation, or vexatious or malicious attribution, rumour or gossip;
- g) Carrying out work in a safe manner and taking precautions to protect the health, safety and welfare of oneself and others;
- h) Complying with any legislative, industrial or administrative requirements;
- i) Avoiding behaviour which might reasonably be perceived as creating an unsafe or unhealthy environment, or constraining the legitimate rights of others;
- j) Respecting an individual's right to privacy and undertaking to keep personal information in confidence;
- k) Respecting privacy laws and confidential information given to them in the course of their employment or enrolment.

5.5. Conflict of Interest

Staff of the Institute should be sensitive to the potential for conflicts of interest to arise between their personal interests and their duties, obligations and responsibilities to the Institute, and shall take care to ensure that no actual conflict of interest arises.

Staff shall avoid situations in which their private interests (whether involving personal financial or pecuniary interests, or external associations, or personal and family relationships between staff or between staff and students) conflict with or might reasonably be thought to conflict with or influence judgements made during the course of their professional duties, and perceptions that an unfair benefit may have been attained or may be attainable. Potential conflicts of interest should be assessed in terms of the likelihood that a staff member possessing a particular interest could be improperly influenced, or might appear to be improperly influenced, in the performance of their duties on a particular matter.

Academic staff have a particular responsibility to their students to assess their work fairly, objectively and consistently across the candidature for their particular unit or course. Because personal relationships between students and staff may involve serious difficulties arising from the unequal power of the parties concerned, as well as difficulties in maintaining appropriate boundaries between professional and personal life, academic staff have a responsibility to declare such potential or actual conflicts of interest to their supervisor as soon as they are aware of them.

Staff or students who believe they may be involved in, or that a potential situation of involvement may give rise to perceptions of, a conflict of interest, must inform and should seek advice from their supervisor or relevant Campus Manager or Campus Academic Coordinator, as the case may be, who will determine what action is to be taken. In the case of Campus Managers or other senior staff, advice should be sought and any potential conflict of interest discussed with the Regional Manager.

Members of staff should take particular care not to take part in the following matters in relation to any student with whom they have a personal relationship:

- i) selection for entry to any course where this depends on a judgement other than a pre-determined score or grade in which they have not been involved;
- ii) assessment procedures;
- iii) selection for any scholarship or prize;
- iv) postgraduate supervision.

Where a potential conflict of interest exists in relation to any student matters then the Campus Academic Coordinator or Campus Manager should approve alternative arrangements.

Failure to disclose a potential or actual conflict of interest by staff or students of the Institute may render any associated decisions null and void, and may result in disciplinary proceedings.

5.6. Reporting Corrupt Conduct

Where reasonable evidence exists, staff and students are encouraged to report suspected corrupt conduct, as well as maladministration and serious or substantial waste of resources, to the Campus Manager or Campus Academic Coordinator, or Group Academic Coordinator or Regional Manager as appropriate. Privacy and confidentiality should be strictly observed in all such cases, and particular care must be taken to avoid vexatious or malicious allegations.

5.7. Outside Work and Private Practice

The employment obligations of staff who receive full-time salaries are to the Institute as their employer. Full-time staff wishing to engage in outside work, including private practice, must seek approval to do so from the Campus Manager, who may approve or not approve such requests. Where a staff member wishes they may appeal such a determination to the Regional Manager, whose decision shall be final.

All staff, including those employed for less than full-time, should not accept outside work where it may cause a direct or indirect conflict with their duties for the Institute or otherwise adversely impact the conduct of their work or reflect poorly on the reputation and public standing of the Institute, or where the possible work is for a competitor organisation where such work could cause loss or harm to SAE Institute, without first discussing it with their Campus Manager and/or senior management. Any such potential direct or indirect conflict must be reported to the Campus Manager in the first instance, and may be raised with the Regional Manager.

5.8. Duty of Care and Safety

Employees are required at all times to work safely and to observe all safety procedures. The staff and students of the Institute must take every precaution reasonable in the circumstances to protect the health, safety and welfare of all those in the workplace. In particular, they must comply with the relevant legislation and relevant Codes of Practice as well as specific Institute Workplace Health and Safety policies and procedures. Staff and students should also actively promote safe working practices and environments for everyone using the Institute's facilities.

Staff should ensure that their personal behaviour does not affect work performance or the health, safety and welfare of others, especially students in their care. Relevant staff should take steps to ensure that all contractors engaged on site are aware of the Institute's WHS Act obligations and are compliant with Occupational Health and Safety policies and procedures.

5.9. Discrimination and Harassment

Staff and students of the Institute must not harass or discriminate against their colleagues, students, members of the public or other persons with whom they may interact on the grounds of (including but not limited to) sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment or sexual preference. Such behaviour may constitute an offence under legislation and will be considered a serious breach of

policy. In addition, staff and students must not harass or discriminate on the grounds of political or religious convictions.

Managers and Coordinators must make every effort to ensure that the workplace is free from all forms of harassment and discrimination. They should understand and apply the principles of equal employment opportunity and ensure that the employees they supervise are informed of these principles.

5.10. Diligence

Staff are expected to be diligent in their work and to carry out their duties in a professional, responsible, and conscientious manner, and to be accountable for their official conduct and decisions. They have an obligation to carry out official decisions and adhere to policies faithfully and impartially.

All employees of the Institute are expected to maintain and enhance their skills and expertise and keep up-to-date the knowledge associated with their particular field or area of work. High standards of performance and a keen focus on client service are expected.

5.11. Confidential Information

Official information must only be used for the work-related purpose intended and not for personal benefit. Officers and employees must make sure that they do not disclose, disseminate or make use of any information marked confidential without prior specific authorisation.

All staff of the Institute must take reasonable steps to ensure that any information marked confidential in any form (e.g. computer files), cannot be accessed by unauthorised people and that sensitive information is only discussed with people who are authorised to have access to it. Unauthorised disclosure or use of confidential information may result in disciplinary proceedings for misconduct.

5.12. Use and Security of Personal Information

All staff have a duty to maintain the confidentiality, integrity and security of information for which they are responsible. In addition, staff of the Institute have an obligation to:

- a) ensure that personal information concerning students or staff is secured against loss, misuse or unauthorised access, modification or inappropriate disclosure;
- b) report to their supervisor, or the Campus Manager, actual or suspected misuse of information.

5.13. Computer Usage

The Institute provides computing, internet and email facilities for work purposes, which should at all times be used in a responsible manner, and in compliance with the relevant Institute policies as well as relevant applicable legislation.

The Institute will not allow excessive or unreasonable personal use of Institute computers and computing systems, and a Campus Manager with approval of the Regional Manager may at any time initiate an audit of Institute email and data files.

5.13.1. Viruses

Any staff members or students that receive any email or files from someone they do not know, or any email or files which may give rise to concern, should not open them, but should contact their supervisor or lecturer or the System Administrator (or the Campus Manager) immediately.

5.13.2. Unacceptable Use of Internet/Email/Computers

The use of the Institute's computers, internet and email facilities for the following purposes is expressly prohibited:

- a) Distribution or saving of material that is illegal in the country of use or destination.
- b) Distribution or saving of material that negatively reflects upon a particular race, gender, religious belief, nationality, marital status or sexual orientation, or is likely to cause offence.
- c) Distribution of copyright material without permission of the author(s).
- d) Distribution of material that may negatively reflect on the Institute's reputation, or the issuing of any unauthorised statement as being attributed to the Institute.
- e) Carrying out or attempting to carry out impersonation, misrepresentation of identity, forgery, substitution of mail, headers or any other identification marks.
- f) Using the Institute's computer systems for gambling or soliciting for personal gain or profit.

5.14. Security of Data

Staff members must not send, pass on or provide access to any confidential Institute material to unauthorised persons. All document and mailing addresses must be checked before email is sent to avoid mistakes or inappropriate disclosure of information.

5.15. Security Maintenance

Staff and on-site contractors must maintain adequate security of the Institute premises in which they are working and must maintain security of keys and swipecards issued to them for the purposes of opening, accessing and using buildings, vehicles, equipment and other facilities. Keys and access devices are to be used only in the performance of approved and scheduled duties, and use for any other purpose requires the prior approval of the Campus Manager.

5.16. Property

Unauthorised possession, unauthorised usage or unauthorised removal or relocation of Institute property or the property of other persons without authorisation or permission is strictly prohibited.

Note: All serious cases, particularly those related to unauthorised possession of property, will be referred to the Police. Any disciplinary action SAE Institute may take is quite separate from, and additional to, any action the Police may choose to take.

5.17. Attendance

Staff who are not able to attend work for any reason must make all reasonable effort to advise their manager or supervisor before their starting time on any day of absence, and where possible to notify other staff whose work may be directly affected. The manager or supervisor must be advised of the reason for the type of absence and the expected date of return to work.

Absences due to sickness longer than three days should normally be justified with presentation of a medical certificate.

Where it is deemed appropriate by the Institute, staff may be required to comply with procedures regarding the recording of attendance.

5.18. Alcohol and Prohibited Drugs

No alcohol is to be consumed on the Institute's premises without the express approval of the Campus Manager.

No prohibited drugs are to be brought into the Institute's premises, and any staff member so involved will be liable to summary dismissal.

Employees on prescription drugs which may impair their personal safety, or the safety of other persons, should report the matter to their manager or supervisor to allow a proper evaluation to be made.

Any staff member who is suspected of having consumed alcohol or prohibited drugs or who, in the opinion of their manager or supervisor, is not capable of satisfactorily performing normal duties, will be stood down without pay, pending further investigation and disciplinary action.

5.19. Smoke Free Workplace

By law all workplaces must be smoke free. All staff and students must observe this requirement. Any rules relating to outdoor smoking areas, or areas near entrances or exits must be adhered to.

5.20. Media Statements and Social Media Networks

Statements to the media or to media representatives or public statements relating to any aspect of the Institute's operations or business are prohibited without the express approval of the Regional Manager or the relevant delegated manager.

Staff are advised to exercise caution in making statements about their paid work or about the Institute and its operations on social media and networking sites, as in some cases such statements may constitute a publication in legal terms and may be the basis for formal action taken against the staff member or the Institute. Policy G02 on Public Information also applies.

5.21. False Declarations

Knowingly making false declarations or false statements in relation to any matters covered in this Code of Conduct is strictly prohibited and will be subject to disciplinary action.

6. Breaches

Any breach of this Code of Conduct may result in a decision by the Regional Manager to instigate a misconduct investigation and disciplinary action, and a serious breach of any of the provisions of this Code by a staff member may result in summary dismissal. Repeated instances of misconduct will be considered as serious misconduct and are grounds for dismissal.

7. Policy Version

Original Version: 2010

Revised: 5-12-2011 (CEO and Managing Director)

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