

# **CODE OF CONDUCT FOR NUS STAFF**

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## **1 POLICY STATEMENT**

1.1 This Code of Conduct ("COC") sets out the professional and personal conduct expected of Staff in the course of their employment with the University.

1.2 The COC is founded on the following core principles, which are expected of all Staff:

- Integrity
- Respect for people
- Respect for the Law and NUS Rules
- Stewardship

1.3 Not exhaustive

- (i) The COC is meant to serve as a broad framework.
- (ii) It is not intended

- (a) to be an exhaustive list of all potential issues which Staff may encounter during their work; or
- (b) to exclude or replace the rights and obligations of Staff under the terms of their employment with the University, NUS Rules or the Law.

1.4 Staff in supervisory roles

In addition, Staff in supervisory roles must:

- (i) lead by example;
- (ii) ensure that Staff under their supervision are aware of and understand the requirements of the COC and their roles and responsibilities in his/her Department and in the University; and
- (iii) implement controls and reviews as appropriate to ensure adherence.

1.5 Staff must acquaint themselves with and adhere to both the spirit and the letter of the COC at all times by displaying the highest level of professional and personal conduct that upholds the values of the University and does not compromise its standing and reputation. Misconduct will not be tolerated and will be investigated fully and disciplinary action will be taken as appropriate.

## **2 SCOPE**

The COC applies to all Staff across the University.

## **3 DEFINITIONS & INTERPRETATION**

3.1 Please refer to Appendix 1 for the definition of the various capitalised terms used in this COC.

3.2 The COC shall be read in conjunction with all Related Documents. Capitalised terms used in the COC that are not otherwise defined shall have the meanings given to them in the Related Documents.

### 3.3 Headings

The headings of the provisions of the COC are to facilitate reference only and do not form a part of the COC, and shall not in any way affect the construction or interpretation thereof.

### 3.4 Inconsistency with the COC

In the event of any inconsistency between the requirements set out in the COC and those set out in the Related Documents and any other documents relating to the subject matter of the COC, the requirements set out in the COC shall prevail unless otherwise stated.

## 4 INTEGRITY

### 4.1 Staff must at all times conduct themselves:

- (i) ethically;
- (ii) with honesty;
- (iii) in good faith;
- (iv) fairly and reasonably;
- (v) with propriety and in a responsible and professional manner;
- (vi) diligently and conscientiously;
- (vii) in compliance with the terms of the Staff's employment with the University; and
- (viii) in a manner that upholds the values, integrity and good reputation of the University.

### 4.2 Conflict of Interest

- (i) A conflict of interest occurs when there is a divergence between an individual's personal interests/relationships and his or her professional obligations to the University, such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise.
- (ii) Staff must comply with all applicable NUS Rules relating to conflict of interest matters and disclose any actual or potential conflicts as soon as possible in accordance with such Rules. NUS Policy Documents relating to conflict of interest matters include, but are not limited to the following:
  - (a) Conflict of Interest Policy for NUS Staff;
  - (b) Consultation Work Policy and Acceptance of Non-executive Directorships and Executive Directorships/ Managerial Positions Policy. In particular, Staff should not undertake unauthorised private work on University time; and
  - (c) University Procurement Policy, University Procurement Procedural Guides and any other applicable procurement-related documents. In particular, Staff who are involved in or responsible for procurement related-matters shall ensure compliance with the University Procurement Policy, Procurement Procedural Guide for General Goods and Services and Procurement Procedural Guide for Building and Construction Goods and Services; and
  - (d) Policy on Acceptance of Gifts and Hospitality by Staff.

#### 4.3 **Research Integrity and the Use of Animals and Human Subjects in Research and Teaching**

- (i) The University is committed to maintaining the highest standards of research integrity. Staff engaging in research should adhere to the highest standards of ethics and research integrity.
- (ii) All research and teaching activities involving animals shall adhere to the Policy Governing the Use and Care of Animals in Research and Teaching.
- (iii) All NUS activities related to research involving human subjects shall comply with the Policy Governing the Use of Human Subjects in Research and Teaching.

#### 4.4 **Receipt of Benefits**

- (i) Staff must not draw any personal gain or other benefit (except their salary and any additional compensation under the terms of their employment with the University) from any business they undertake for and on behalf of the University.
- (ii) The acceptance and provision of gifts, meals and hospitality by Staff is only permitted in accordance with NUS Policy Documents governing the same, including but not limited to the:
  - (a) Policy on Acceptance of Gifts and Hospitality by Staff;
  - (b) Policy on Sponsorship by Industry; and
  - (c) Policy on Business Meals and Staff-Related Functions.

#### 4.5 **Personal Relationships**

##### 4.5.1 Intimate Relationships

- (i) Intimate Relationships include marital, sexual, amorous, romantic and emotional relationships, whether heterosexual or same sex relationships.
- (ii) Staff-Student relationships:
  - (a) The integrity of the Staff-Student relationship is the foundation of the University's educational mission.
    - (i) With undergraduate Students:

Intimate Relationships, consensual or otherwise, between Staff and an undergraduate Student are prohibited. To avoid doubt, this is regardless whether Staff has any direct or indirect authority or other responsibilities over the undergraduate Student.
    - (ii) With graduate Students/Other Students:

Intimate Relationships, consensual or otherwise, between Staff and a graduate Student or any other Student are prohibited, when the Staff exercises or expects to have any pedagogical, supervisory or mentorship responsibilities or any other direct or indirect influence or authority (including, but not limited to, course teaching, examining, grading, mentoring and advising) over such Student.

(b) For the purposes of Section 4.5.1(ii), where an individual is both a Staff and a Student at the same time, he/she will be treated as either a Staff or Student depending on the following:

- If the individual is in a relationship with a Staff, he/she will be treated as a Student.
- If the individual is in a relationship with a Student, he/she will be treated as a Staff.

(c) Where a Staff engages in conduct prohibited in this Section 4.5.1(ii), any consent by the Student shall be regarded as not having been given freely or voluntarily for the purposes of Section 5.1(iii)(c), and such conduct will be treated as an act of Sexual Misconduct.

(iii) Staff-Staff Relationships:

Intimate Relationships between Staff are prohibited where one Staff has or reasonably expects to have a supervisory or mentoring relationship or any other direct or indirect influence or authority over the other. If this arises, the Staff in the position of greater authority or power **must** undertake the steps in Section 4.5.3 below.

(iv) Pre-existing Intimate Relationships:

There may be situations where a Staff and a Student or Staff and Staff are already in a pre-existing Intimate Relationship before the prohibitions in Sections 4.5.1(ii) and (iii) above are contravened.

Examples include:

- Staff and Student or 2 Staff who are already in a relationship before either of them join the University.
- Staff and Student who are in a relationship not previously prohibited but which becomes prohibited because of a change in circumstances. This could arise where the Staff did not previously exercise or expect to have any pedagogical, supervisory or mentorship responsibilities or any other direct or indirect influence or authority over such Student (excluding undergraduate Students), but now does due to a change in circumstances.
- 2 Staff who are in a relationship not previously prohibited, but which becomes prohibited because of a change in circumstances. This could arise where a Staff did not exercise or expect to have any supervisory or mentoring relationship or any other direct or indirect influence or authority over the other, but now does due to a change in circumstances.

The prohibitions in Sections 4.5.1(ii) (Staff-Student Relationships) and 4.5.1(iii) (Staff-Staff Relationships) above do not apply to pre-existing Intimate Relationships, provided that:

(a) for Staff-Student Relationships, **the Staff** takes the steps in Section 4.5.3 before or at the latest when the Student or the Staff joins the University or when the change in circumstances that causes the prohibition occurs (as the case may be); and

(b) for Staff-Staff Relationships, **all Staff** take the steps in Section 4.5.3.

#### 4.5.2 Other personal relationships

- (i) Staff must not allow their personal relationships with any Staff, Student and/or any other person in the University community to affect their professional relationships. Personal relationships include business, commercial, financial, close friendships, social relationships and family or other significant relationships including past Intimate Relationships.
- (ii) Where a situation described above (in Section 4.5.2(i)) arises, the Staff **must** take the steps set out in Section 4.5.3. Examples of situations that could potentially give rise to such issues are listed below but are not intended to be exhaustive.
- (iii) Examples of situations that Staff should avoid involving another Staff with whom they have a personal relationship include, but are not limited to:
  - (a) recruitment, selection and appointment process;
  - (b) managerial, supervisory and/or assessment relationships, including but not limited to, allocation of duties, performance evaluation, job development, promotion prospects, training opportunities etc.;
  - (c) allocation and/or approval of financial and other resources;
  - (d) conference arrangements;
  - (e) access to confidential/restricted information;
  - (f) nomination for or appointment to committees/working groups etc.;
  - (g) any involvement in investigatory, disciplinary and/or sanctioning processes pertaining to such related Staff.
- (iv) Examples of situations that Staff should avoid involving a Student with whom they have a personal relationship include, but are not limited to:
  - (a) interview and/or selection process for admissions, scholarships, financial aid etc.;
  - (b) teaching, supervisory, mentoring and/or assessment relationships;
  - (c) allocation and/or approval of facilities and other resources (e.g. accommodation);
  - (d) access to confidential/restricted information;
  - (e) any involvement in investigatory, disciplinary and/or sanctioning processes pertaining to such related Student.

#### 4.5.3 Declaration and Resolution of Conflict

- (i) A Staff must immediately declare<sup>1</sup> to his/her Head of Department<sup>2</sup> if required under Section 4.5.1(iii) (Staff-Staff Relationships), Section 4.5.1(iv) (Pre-existing Intimate Relationships) and/or Section 4.5.2 (Other personal relationships).
- (ii) In addition, Staff should relinquish any existing pedagogical, supervisory, mentoring, or evaluating responsibilities concerning the Student or other Staff,

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<sup>1</sup> Such declaration shall be made on the University's prescribed form as advised by the Office of Human Resources.

<sup>2</sup> If the individual making the declaration is the HOD, then the declaration should be made his/her Reporting Manager.

and/or work with his/her Head of Department<sup>3</sup> to resolve the conflict to the satisfaction of the Head of Department (including eliminating of any potential for influence).

- (iii) The failure to declare and recuse under Sections 4.5.3(i) and (ii) above is a violation of Sections 4.5.1(ii) and (iii) and Section 4.5.2 (as applicable).
- (iv) If in doubt whether a relationship falls within this policy, individuals should disclose the facts and seek guidance from his/her Head of Department<sup>4</sup> rather than fail to disclose.

#### 4.6 **Dishonesty**

Staff must avoid dishonesty in any form, including but not limited to, plagiarism and all acts of Fraud (as defined in Appendix 1).

### 5 **RESPECT FOR PEOPLE**

5.1 Staff must treat other Staff, Students, other members of the University community and the public with dignity, consideration and respect. Specifically:

- (i) Staff must conduct themselves with decorum and be exemplary and professional in their dealings and interactions with others.
- (ii) Staff must give due credit and acknowledgment of the work and contributions of others.
- (iii) Staff must refrain from all of the following acts against any other Staff, Student, any other member of the University community and the public, whether directed at an individual or group and whether it takes the form of an action, be it verbal, in writing or on digital media:
  - (a) all forms of unfair treatment and **Discrimination** (as defined in Appendix 2);
  - (b) all acts (including threats) of **Harassment** (as defined in Appendix 3);
  - (c) all acts (including threats) of **Sexual Misconduct** (as defined in A Policy on the Protection of Students and Staff Against Sexual Misconduct; and
  - (d) all acts of **Retaliation** (as defined in Appendix 4).
- (iv) Staff should be sensitive and respectful of each other's differences, including but not limited to differences in culture, beliefs, gender, race, religion, language or age.

### 6 **RESPECT FOR THE LAW AND ALL NUS RULES**

#### 6.1 **The Law**

- (i) Singapore - In their conduct and dealings with others, Staff must observe

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<sup>3</sup>See footnote 2.

<sup>4</sup>See footnote 3.

and uphold the laws and regulations of Singapore at all times.

- (ii) International - Where their conduct and dealings involve other jurisdictions, Staff must observe and uphold the laws and regulations of such other countries.

## 6.2 **NUS Rules**

Staff must abide by all NUS Rules.

## **7 STEWARDSHIP**

### 7.1 **University Resources**

Staff must use all University property (including IT Resources) and finances or property and finances entrusted to NUS, in accordance with the relevant University Policy Documents.

### 7.2 **Intellectual Property**

- (i) In the process of creating, disseminating and applying knowledge, Intellectual Property (as defined in the Policies Relating to University Intellectual Property) is developed or created by Staff.
- (ii) Staff must safeguard the interests and Intellectual Property rights of the University and adhere to all relevant University Policy Documents related to the protection, management and commercialization of University Intellectual Property, including but not limited to the:
  - (a) Policies Relating To University Intellectual Property; and
  - (b) guidelines on Research Contract Negotiation & Management.

### 7.3 **University Data**

All University Data received, obtained or released in the course of a Staff's duties to the University shall be managed and kept confidential in accordance with the relevant University Policy Documents, including but not limited to the:

- (i) Data Management Policy;
- (ii) Research Data Management Policy; and
- (iii) Data Protection Policy.

### 7.4 **Reputation of University**

While the University encourages an open exchange of ideas within the University as well as with the local and global communities, Staff must bear in mind the importance of responsible communication, as laid out in the Public Communications and Publications Policy.

### 7.5 **Safety and Health**

- (i) The University is committed to ensuring a high standard of occupational



safety and health on campus as the safety of the University's Staff, Students and visitors is paramount and must not be compromised.

- (ii) All Staff have a responsibility in implementing a positive safety culture and must comply with all relevant University Policy Documents relating to such matters, including but not limited to the University Safety and Health Policy and all other NUS Safety and Health Standards which may be found here.

## **PROCEDURES**

### **8 REPORTING OF BREACHES**

Staff who are aware of any breach of the COC should report the matter to their Head, HR Partner, the Chief Risk Officer or the Whistleblowing Unit.

### **9 INVESTIGATIONS**

9.1 The procedure for investigations of any alleged breach of the COC and/or other University Policy Documents will be governed by the:

- (i) Staff Disciplinary Procedures and Sanctions Policy;
- (ii) NUS Code & Procedures on Research Integrity and/or
- (iii) Whistleblowing Policy,

as appropriate or otherwise determined by the University.

9.2 The University's investigation and all reports relating to the investigation will be maintained with confidentiality to the extent possible given the need for the proper conduct of an investigation.

9.3 Staff must submit to the University's investigation into any breach of the COC and/or other University Policy Documents.

### **10 NON-RETALIATION**

10.1 Retaliation, as defined in Appendix 4, is prohibited even if an investigation ultimately finds that such concerns on Retaliation were without merit.

10.2 Any concern raised in a malicious manner, in bad faith or intended to be harassment of the alleged offender are prohibited and may result in consequences against the Complainant.

10.3 Any concerns on Retaliation should be raised to the Chief Risk Officer or the Whistleblowing Unit.

### **11 SANCTIONS**

Sanctions where appropriate for any breach of the COC may be imposed in accordance with the Staff Disciplinary Procedures and Sanctions Policy.

**12 REVIEW OF POLICY**

The University shall be entitled to revise, amend or update the COC and to issue additional guidelines from time to time. All such revisions, amendments, updates and additions shall be deemed to be a part of the COC. Any revisions, amendments, updates or additions to the COC issued by the University may be published or notified through written notice, electronic mail, the University website, or such other form of communication as the University may deem appropriate.

**13 QUERIES**

All questions as to the interpretation of the COC shall be referred to the Office of Human Resources.

**14 ADHERENCE TO THE COC**

Compliance with the COC is mandatory and any failure to comply with the COC (including any arrangements that are established under it) may, at the University's absolute discretion, be investigated and result in such corrective and/or disciplinary action(s) as the University deems fit.

**15 EXCEPTIONS TO THE COC**

Any exceptions to the requirements of the COC require prior written approval from the NUS Board of Trustees. Approval will only be granted:

- (i) after consultation with the Office of Human Resources; and
- (ii) in very exceptional circumstances.

**16 LIST OF APPENDICES**

No.	Title
1.	Definitions
2.	Discrimination
3.	Harassment
4.	Retaliation

## APPENDIX 1 – DEFINITIONS

In the COC, the words below shall have the following meanings:

<b>“Complainant”</b>	The Staff, Student or third party who alleges that he/she has been subjected to a form of misconduct.
<b>“Fraud”</b>	<p>Fraud refers to an act or omission in order to obtain an illegal, inappropriate or unethical gain or benefit for oneself or any other party, cause loss to another party and/or avoid an obligation/liability, regardless of whether such intended objective is achieved. The wrongful act is the attempt to deceive and as such, any attempts to commit Fraud will be deemed a breach of the COC.</p> <p>A non-exhaustive list of examples of Fraud includes but is not limited to:</p> <ul style="list-style-type: none"> <li>(i) cheating</li> <li>(ii) bribery (either giving or receiving of a bribe in any form)</li> <li>(iii) corruption</li> <li>(iv) conspiracy and collusion</li> <li>(v) money laundering</li> <li>(vi) extortion</li> <li>(vii) embezzlement/misappropriation/impropriety in the handling of funds, securities, supplies, or any other assets</li> <li>(viii) theft/stealing</li> <li>(ix) false representation</li> <li>(x) concealment and/or destruction of documents/information/data etc.</li> <li>(xi) falsification, forgery or fraudulent alteration of documents (e.g. cheques, bank drafts, contractual agreements, purchase orders, invoices, etc.) or data such as financial, operational and computer data</li> <li>(xii) submission and/or use of fictitious/falsified documentation/data.</li> </ul>
<b>“IT Resources”</b>	<p>Refers to information technology resources owned, controlled or managed by the University, including but not limited to:</p> <ul style="list-style-type: none"> <li>(i) all components and functions of a computer system which includes the hardware (e.g. personal computers, servers etc.), software (both system and application) and communication network systems;</li> <li>(ii) peripheral devices such as telephones, printers, fax machines, wireless communications, public safety radio services and other technologies; and/or</li> <li>(iii) the information databases, including, but not limited to, files, emails and data analytics and all other data created and maintained in the course of employment.</li> </ul>

<b>"Law"</b>	Refers to all applicable laws relevant to this COC including but not limited to Singapore law. This shall include, but is not limited to, any and all existing legislation in Singapore, any and all rules, regulations, codes of practice, by-laws, ordinances, decrees, practice directions, standards of performance and any other requirements imposed by any governmental authority, and all amendments and/or revisions thereto from time to time.
<b>"Policy Document(s)"</b>	A University document, which is employed in the governance and administration of the University's operations (i.e. policies, procedures and guidelines and such other documents as management may from time to time designate as such).
<b>"Related Documents"</b>	All NUS Policy Documents, internal University legislation, external government legislation, websites, forms, templates, publications and other documents referred to in the COC or related to the subject matter of the COC, as amended and supplemented from time to time, including but are not limited to, the documents set out in Appendix 6 below.
<b>"Respondent"</b>	The person alleged to have committed an act of misconduct against the Complainant.
<b>"Staff"</b>	Refers to all Staff members, as defined in the Staff Disciplinary Procedures and Sanctions Policy.
<b>"Student"</b>	Refers to "student" as defined in the NUS Statutes and Regulations.
<b>"University"</b>	Refers to "National University of Singapore" or "NUS". "University", "National University of Singapore" and "NUS" are used interchangeably in the COC.
<b>"University Data"</b>	As defined in the Data Management Policy.
<b>"University Rules"</b>	Refers to the NUS Statutes and Regulations, Policy Documents and all other rules/regulations/guidelines/procedures related to the governance of the University, including but not limited to, arrangements for teaching, research, terms and conditions of appointment, finance, administration, and discipline and welfare in the University.

## **APPENDIX 2 – DISCRIMINATION**

### **WHAT IS DISCRIMINATION?**

1. Discrimination means treatment or consideration of, or making a distinction in favour of or against, an individual, based on:
  - (i) a personal characteristic that that individual possesses (or is perceived to possess) (e.g. personal appearance, age, disability, sexual orientation, marital status etc.) ("**Discriminated Characteristic**");
  - (ii) the group, class, or category to which that individual belongs (or is perceived to belong) (e.g. gender, race, religion, political beliefs etc.) ("**Discriminated Group**"); or
  - (iii) an individual's connection with another individual who possesses such Discriminated Characteristic or belongs to such Discriminated Group.

rather than on individual merit.
2. Discrimination can be sexual or non-sexual in nature. For further details of what constitutes Sexual Discrimination please refer to A Policy on the Protection of Students and Staff Against Sexual Misconduct.

## APPENDIX 3 – HARASSMENT

### WHAT IS HARASSMENT?

1. Harassment means any unwelcome, unwarranted and uninvited conduct or behaviour by an individual (the “**Respondent**”) that:
  - (i) discomfits, demeans, humiliates, insults, threatens, intimidates, alarms, distresses, offends, bullies, coerces, exploits or otherwise violates the dignity of another individual (the “**Complainant**”); or
  - (ii) creates an intimidating, abusive, hostile, degrading, humiliating, offensive or unfavourable environment for the Complainant.
  
2. For the avoidance of doubt, the term “Harassment” in the COC and the Related Documents refers to any of the abovementioned forms of conduct or behaviour, regardless of:
  - (i) intent (i.e. Harassment can exist even if unintended)
  - (ii) response (i.e. Complainant does not need to have expressed that the behaviour was unwanted)
  - (iii) form (e.g. verbal, non-verbal, physical, psychological)
  - (iv) means of communicating act of harassment (e.g. in-person, written correspondence, posts on social media platforms, mobile communications devices etc.)
  - (v) means of contact with affected person (i.e. directly or indirectly)
  - (vi) location (i.e. within or outside the premises of NUS)
  - (vii) occasion (i.e. within or outside the context of employment/enrolment)
  - (viii) persons affected (e.g. NUS Staff/Students or non-NUS Staff/Students, same or opposite sex)
  - (ix) nature of relationship between Complainant and Respondent (e.g. between peers or parties of different position/level)
  - (x) number of Complainants and Respondents
  - (xi) frequency (e.g. single incident, course of behaviour or ongoing persistent behaviour).
  
3. Harassment must be differentiated from behaviour that, despite being potentially unpleasant or distressing, is appropriate and/or necessary to the performance of various management functions and responsibilities (e.g. the provision of advice, performance reviews/appraisals/evaluation reports etc.)
  
4. Harassment can be sexual or non-sexual in nature. For further details of what constitutes Sexual Harassment, please refer to A Policy on the Protection of Students and Staff Against Sexual Misconduct.

## APPENDIX 4 – RETALIATION

1. Retaliation refers to any adverse acts against an individual who, in good faith and without malice:
  - (i) raises concerns over various matters such as business practice, ethical and legal issues;
  - (ii) files a complaint or grievance or assists another individual with that individual's complaint; and/or
  - (iii) reports, provides information, assists, participates, testifies or is otherwise in any way involved in investigations, hearings, review processes, conflict resolution processes, legal actions or any other proceedings relating to conduct prohibited or in contravention of the COC, the NUS Rules or the Law.
  
2. Forms of Retaliation include, but are not limited to:
  - (i) intimidation;
  - (ii) unfavourable actions with respect to an individual's employment e.g.
    - (a) reassignment of work duties, variation of remuneration and/ or staff benefits, unilateral transfer etc.);
    - (b) negative performance evaluation/withholding advancement;
    - (c) corrective actions or disciplinary sanctions; and
    - (d) termination of employment;
  - (iii) unfavourable actions against someone with known family\* or other relationship with such individual; and
  - (iv) threats of any of the above.

*\*Family relation includes step relations and refers to the individual's spouse/domestic partner, in-laws, parents, children (including legally adopted children), siblings, nephews, nieces, uncles, aunts, cousins, grandparents and spouses of all the above-mentioned.*