



Ethical Business Policy

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This document forms part of our Management Systems and compliance is mandatory for all staff and contractors. If you find any weaknesses in the document or examples of non-compliance, please report it to the Compliance Team at compliance@bcs.uk .

1 Policy Statement

In pursuance of our mission to make IT good for society, accomplish the charitable endeavours and obligations deriving from our Royal Charter and earn the trust of our customers and business partners, BCS Group promotes and sustains a culture of good business practice, integrity, positive employee behaviour, transparency and accountability.

We work hard to manage our business responsibly, be a good neighbour, reduce our environmental impact and celebrate diversity.

We look after our colleagues, encouraging their physical and mental well-being, creating an inclusive culture and developing initiatives to create a more diverse workforce.

This Ethical Business Policy establishes our standards regarding acceptable business practices and demonstrates our commitment to acting in good faith in all our business relationships and to implementing and enforcing effective monitoring processes and controls able to ensure that unfair practices have no place in our operations.

BCS aligns to the commitments of the United Nations for the protection and defence of human rights, the Ten Principles of the UN Global Compact and supports the standards of the International Labour Organization. BCS maintains full compliance with current legislation regarding human rights, labour, environment and anti-corruption.

We are committed to ensuring outstanding levels of integrity and ethics in carrying out our operations, rejecting any unfair treatment, anticompetitive practices and all forms of corruption and bribery. All employees must declare any outside business interests and any situation that have potential to result in a conflict of interest.

This policy must be appropriately communicated across BCS Group and to our business partners. All employees will receive awareness training regarding this policy as part of the induction process and in subsequent refreshment sessions at regular intervals. The required standards of behaviour must be demonstrated in all organisational areas.

Any deviations from this Policy must be authorised by the Executive Team. This policy does not form part of any contract of employment and BCS may amend it at any time.



Sharron Gunn, BFP MBCS FCA
Group Chief Executive
BCS, The Chartered Institute for IT

2 Scope and Objectives

This policy applies to BCS Group, all its wholly owned and other subsidiaries and all persons working on behalf of BCS Group in any capacity.

It is intended to facilitate the achievement of BCS Group wide objectives of:

- setting the standards that create the outstanding across the IT industry;
- reinforce the BCS Chartered status as the global benchmark for IT excellence;
- successfully engaging with partners, organisations, government and individuals by addressing the wider issues around the role of technology in society.

3 Supporting our Workforce

We know our colleagues can only perform at their best if we look after their well-being, from physical health and mental resilience right through to financial health and social support. A dedicated network of mental health advisors is on hand to deal with any issues who also champion wellbeing throughout our business. We regularly increase awareness of physical and mental health risks and provide a range of help and support to those who need it.

We understand that diverse perspectives, experiences and backgrounds enable our business to flourish, be more dynamic and continue to grow. From gender and ethnicity to our commitment to support our colleagues across the generations, we value diversity in every sense.

We encourage our people to celebrate and be proud of diversity. We strive to grow an inclusive environment in which everyone can thrive.

4 Conducting Business Responsibly

We are committed to operating our business in a responsible manner.

4.1 Ethics and Integrity

Everyone working for us is expected to act with integrity, in accordance with company policies and in compliance of the laws of the countries where they work. Our suppliers are bound by the terms of the BCS Supplier Code of Conduct which requires them to:

- Act with honesty and integrity;
- Provide a safe working environment where employees are treated with dignity and respect;
- Seek to minimise and reduce our impact on the environment;
- Provide supply chain transparency and improve supply chain standards.

4.2 Legal Requirements

BCS is committed to observe and comply with all current and relevant external statutory laws and Regulatory requirements. We clearly set, communicate and enforce procedures and controls for preventing violations of laws, rules or regulations applicable to us and disciplining those who do not comply with external norms or our ethical standards.

4.3 Equal Opportunity and Diversity

BCS maintains a working environment based on the appreciation of individual differences where all employees are treated with dignity, respect and fairness. We recognise and value the diversity of all learners and we actively promote the richness that this diversity engenders. We make reasonable accommodations for individuals with disabilities.

We oppose and form of discrimination, whether directly or indirectly, on the grounds of colour, race, nationality, ethnic origin, gender, marital or family status, disability, religious belief or sexual orientation. We are committed to engaging in open communication with our employees, customers, business partners, regulators, stakeholders and the general public.

4.4 Harassment

BCS is committed to provide a work environment free from disturbing behaviour, degrading humour, obscene remarks, unwanted sexual advances or requests for sexual favours and any form of abusive verbal or physical conduct that can create an intimidating, depressing or offensive work ambiance and make people feel distressed, humiliated or threatened.

4.5 Modern Slavery and Human Trafficking

We have zero-tolerance to modern slavery in all its forms resulting in the deprivation of a person's liberty by another for personal or commercial gain and we are committed to implementing and enforcing effective controls to ensure that modern slavery is not taking place anywhere in our business, outsourced services and any other part of our supply chain.

4.6 Human Rights

BCS recognises the importance of human rights, as both a value-based and a business issue and aligns with the UN Guiding Principles on Business and Human Rights and its "Protect, Respect and Remedy" Framework.

We have a responsibility to respect human rights in our capacity as an employer and as an organisation. We recognise this is an important topic, and we will continue to work on ways to incorporate it into our business. In terms of the risk, this has been assessed and BCS has determined this is a low risk to the business as we do not work with suppliers who do not sign up to the Modern Slavery Code of Conduct and we do not work with third world countries where human rights are not embedded and we do not manufacture products. We have a watch list for sensitive countries where systematic human rights violations occur.

As an employer we respect international human rights standards for our employees. As a company, we respect and apply international human rights standards to our suppliers.

4.7 Child Safeguarding

BCS is committed to protecting the welfare of all children who participate in events organised by or on behalf of BCS. Where the event allows children 16 or younger to attend, all children under the age of 13 must be accompanied by a parent or guardian when attending an event. Children aged 13 to 16 may attend unsupervised but with parental permission sought by the event's organisers. Standard rules apply to people of 17 years and older.

4.8 Use of BCS Assets

BCS Group employees must safeguard and appropriately use the organisation's assets, which may include physical and intellectual property, operational systems, funds or information about our customers, suppliers, vendors, partners and colleagues. Misappropriation of assets or misuse of systems and information is not allowed.

4.9 Health and Safety

BCS is committed to safeguarding the health and safety of employees and all others working on our premises or who may be affected by our operations. We have processes in place to identify circumstances presenting a danger of injury and ensure that we maintain a workplace which is healthy, safe and fully compliant with all applicable laws and regulations at all times.

4.10 Substance Abuse and Impairment in the Workplace

BCS maintains an alcohol-free and drug-free work environment. Employees must not use, distribute or be under the influence of illegal drugs or controlled substances or other substances which may impair their job performance or judgment while executing their job duties on BCS premises or working for BCS from other locations.

4.11 Reducing our Environmental Impact

We seek to conduct all activities in an environmentally responsible manner and are committed to:

- Complying with environmental legislation;
- Preventing pollution and minimising its impact on the environment;
- Protecting the natural environment;
- Continually improving our environmental management system and environmental performance.

Our corporate objectives are to improve environmental risk management, reduce carbon emissions per customer, minimise waste, reduce disposal to landfill and increase re-use and recycling.

Waste and recycling

- We have removed single usage plastic cups in our offices;
- We have moved to using china crockery where possible and use metal cutlery rather than plastic disposable cutlery;
- We invite our customers to bring their own re-usable water bottles and cups.

4.12 Personal Data Protection

BCS and its subsidiaries are registered with the Information Commissioner under the Data Protection Act 2018 and committed to protecting personal data privacy according to the legal and regulatory requirements and eight principles established by law. All BCS employees are given training on the safe use and protection of personal data. All business partners handling personal data are expected to abide by this policy. BCS has a Data Protection Officer in post.

4.13 Conflicts of Interest

Every member of BCS staff must seek to avoid or manage the conflict of interest and the potential conflicts of interest in a fair and objective manner. Any situation of real or potential conflict of interest must be disclosed to and approved in writing by the relevant person's manager. Guidance for identifying such situations is available in the Business Management Manual. Similar requirements apply to any business partner working for or acting on behalf of BCS Group.

Senior members of BCS staff are required to file annual Conflict of Interest disclosure forms. All those required to do so will be notified by Compliance.

4.14 Bribery and Corruption

BCS staff and representatives are prohibited from offering or accepting bribes, either directly or indirectly. A bribe is any form of financial or non-financial advantage or inducement that is intended, or it is likely to determine the recipient to act unethically, unfairly, dishonestly, illegally, or in breach of a fiduciary duty or other responsibilities.

Facilitation Payments

BCS Group does not allow payments to be made in return for the facilitation of transactions; appointments; or deliver a level of service which one would normally be entitled to. Any such event must be reported to the Head of Legal, Compliance & Governance for instructions.

Gifts, Hospitality & Entertainment

BCS staff must not accept gifts or hospitality if such acceptance gives the impression that the gift or hospitality influenced them in making a favourable decision. The conduct of BCS staff must stand up to public scrutiny and not have any adverse implications for BCS Group. Any gifts or hospitality which are accepted must be added to the Gift and Hospitality Risk Register which can be found via the search engine on the Green Room. Refer to the Gifts and Hospitality Policy for further information.

If there is any doubt, or if the value of the gift/hospitality is above approximately £250, you must discuss this with your Divisional Director before accepting or offering it.

4.15 Political Contributions

BCS is politically neutral. We do not make donations, whether in cash or kind, on support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage. Any employee that holds or seeks to hold an official position in a political party should notify Compliance in advance and declare such position as a potential conflict of interest.

4.16 Charitable Contributions

We only make charitable contributions that are legal and ethical. No donation must be offered or made without prior approval of Line Manager. All public charitable contributions will be publicly disclosed. Charitable support and donations are acceptable whether financial contributions, in-kind services or knowledge as long as they are not used as a scheme to conceal bribery.

4.17 Fair Competition

BCS strongly supports the principles of free competition. It is prohibited for any employee to collaborate with third parties against the interests of customers. It is also forbidden to enter into relations intended to prevent or distort competition and to display any other anti-competitive behaviour that may expose BCS Group to potential liability.

4.18 Fraudulent Activity and Plagiarism

We reserve the right to act against any person or organisation (be that an accredited training provider or not) that is believed to have been involved in fraudulent activities, including, but not limited to, cheating in an examination, alteration of certificates, plagiarism or other activities deemed as fraudulent by BCS.

4.19 Relationships with Customers

Providing a great customer service, delivered with integrity and honesty, is an essential goal for BCS. In designing and delivering qualifications and apprenticeship programmes, we are focused on providing the best solutions for our customers' needs, able to guarantee fair assessment for all candidates.

4.20 Relationships with Business Partners

In managing the relations with providers of goods and services, BCS Group complies with all legal and regulatory requirements and conduct transactions with integrity, fairness, and courtesy. All business partners are selected and re-appointed on merit and in accordance with BCS requirements. There is a Supplier Policy which outlines the Code of Conduct we expect our suppliers to adhere to.

4.21 Public Relations

BCS group is committed to listen and respond in a timely manner to all reasonable enquiries made by external parties who may need information about us or may be affected by our operations. All public communications and advertising materials must be fair, ethical, unbiased, accurate and clearly comprehensible.

5 Responsibilities

5.1 General responsibilities

All BCS staff have personal responsibility for maintaining an ethical work environment. Their actions in the workplace must always demonstrate commitment to integrity and accountability. The compliance with the BCS Group’s policies and internal regulations will be considered in the evaluation of the individual job performance.

5.2 Special Responsibilities

BCS Group’s Directors and Senior Managers have a special responsibility for setting the right ethical tone and must be models of honesty and integrity for others. They must ensure compliance with this policy of all those reporting to them and take effective measures to ensure that everyone receives appropriate training and understands this policy.

6 Raising Concerns and Protection

We are committed to maintaining a work environment where concerns can be openly raised and discussed without fear of any detrimental treatment or other unfavourable reactions connected with raising a concern or because of reporting, in good faith, a suspicion that an actual or potential unethical act or other offence has taken place or may take place in the future.

BCS aims to establish and maintain a culture of openness and we want to encourage our staff, customers, centres and students to raise issues which concern them in relation to the delivery of our qualifications and services.

Customers who believe that there is any kind of misuse should refer to the BCS whistle-blowing Policy which outlines how to report a potential malpractice or abuse.

For staff, if unfair treatment occurs, the affected employee should report it to their line manager immediately. If the matter is not resolved, the employee should follow the Grievance Procedure.

7 Breaches and Investigation

Any real or alleged breach of this policy at BCS or any of our partners may trigger a formal investigation conducted by the Head of Legal, Compliance & Governance. The results of the investigation will be reported to the Executive Team.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with any individual and organisation working on our behalf if they breach this policy.

8 Monitoring

The Head of Legal, Compliance & Governance will monitor the implementation and effectiveness of this policy with regards to its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

9 Review

This policy will be reviewed on an annual basis in line with BCS standards and regulatory criteria. We will also consider any customer feedback, trends from our internal monitoring arrangements, changes in our practices, actions from the Awarding Bodies or other relevant external agencies as well as changes in legislation.



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