

GHANA CHRISTIAN UNIVERSITY COLLEGE

Ethics Policy

2017

Table of Contents

	The GhanaCU-Citizen Honor Code	3
I.	Introduction	4
II.	Benefits, Gifts and Honoraria	6
III.	Control of Fraud, Waste and Abuse	9
IV.	Use of University Resources	12
V.	Student Academic Ethics Policy	15
VI.	General Code of Conduct for Students	22
VII.	Conflict of Interest	26
VIII.	Staff -Student Relationship	35
IX.	Code of Confidentiality	43
X.	Representing GhanaCU: Public utterances	45
XI.	Reporting Conducts and Complaints	47
XII.	Sexual Misconduct Policy	48
XIII.	Harassment Policy –University Anti-Harassment Policy	49
XIV.	Whistle-Blowing Policy	51
XV.	Equal Opportunities and Diversity Policy	55
XVI.	Statement of University Health and Safety Policy	59
	APPENDIX 1 WHISTLEBLOWER REPORT FORM	62

Ethics – GhanaCU Code of Conduct

GhanaCU-Citizen Honor Code

As members of the GhanaCU Community - whether as students, faculty or staff - we aspire to excellence in all that we do. One of the simplest and most straightforward ways to attain excellence is to judge our actions against the GhanaCU-Citizen Code of Honor: A GhanaCU-Citizen does not lie, cheat or steal, or tolerate those who do. With this as our standard, we pursue excellence in Ghana Christian University College and around the world.

What is the GhanaCU -Citizen Code of Honor?

**“I do not lie, cheat or steal, or tolerate those who do.
I count all other GhanaCU-Citizens my family”**

The GhanaCU-Citizen Code of Honor affirms values that apply to students, faculty and staff alike. This simple statement exemplifies three of our core values—underscores our commitment to ethical conduct and compliance with regulations and official policies. These core values forge a strong base to embrace all our core values:

Speed, Honesty, Innovation, Nerve, Enthusiasm,

SECTION I

Introduction

Policy Statement

The responsibility for educating and training the future leaders of the state and nation carries with it the duty to adhere to the highest ethical standards and principles. The Council of Ghana Christian University College, therefore, promulgates the following ethical principles and standards to ensure that the board members and all persons employed by the system, regardless of rank or position, are held to the highest ethical principles.

Procedures and Responsibilities

1.1 Ghana Christian University College follows various "guiding principles" in pursuit of its objectives, most importantly consideration and support for the professional development, and intellectual and cultural needs of the staff and the student body.

1.2 The University is accountable to its staff, students, the public and the state. It is in the interests of all members of the University to maintain the highest possible ethical standards including accuracy, honesty, cooperation, tolerance and adherence to obligations as well as rights.

1.3 The Code of Conduct is a formulation of policies, rules or guidelines that define the specific actions or procedures applicable to members of Ghana Christian University College in respect of a range of specific ethical issues.

1.4 This Code applies to all staff and students of the University. The purpose of the Code is to ensure high standards of integrity in the conduct of the University's business, and to avoid both impropriety and any appearance of impropriety. Contractors, their employees and representatives, and visitors engaging in any University-related activity are expected to conduct themselves in a manner that is consistent with this Code.

1.5 The Code does not supersede other policies or agreements that the Ghana Christian University College has in place. Members of this University should be familiar with the responsibilities which are part of their employment, and be aware that sanctions will be applied if these provisions are breached. These sanctions may include counselling, suspension, dismissal, laying criminal charges or taking civil action against the offending party.

1.6 Compliance - Heads of Department are responsible for ensuring that within their Department, the Code is followed and a record of outside interests and employment is kept. It may be a misconduct under the University's Disciplinary Rules for Members of Staff for any staff to fail to comply with the Code.

1.7 Disclosure - All those to whom the Code applies should declare any perceived or potential conflict of interest between their private affairs and those of the University, arising in the course of their duties, to their Head of Department, Dean, Academic Registrar, a Vice President, or the President as appropriate.

1.8. University Council members and University employees have the responsibility to conduct themselves in accordance with the highest standards and to embrace the principles of honesty, accountability, respect and trust. They must ensure that their integrity is of the highest caliber and their conduct is indisputable and beyond reproach. University Council members and University employees:

1.8.1. Shall not hold financial interests that are in conflict with the conscientious performance of their official duties and responsibilities.

1.8.2. Shall not engage in any financial transaction in order to further any private interest using nonpublic information which they obtain in the course of their employment.

1.8.3. Shall be honest and ethical in their conduct and performance of their duties.

1.8.4. Shall not make unauthorized commitments or promises of any kind purporting to bind the University.

1.8.5. Shall not use their public offices for private gain.

1.8.6. Shall act impartially and not give preferential treatment to any private or public organization or individual.

1.8.7. Shall protect and conserve University resources and shall not use them for other than authorized activities.

1.8.8. Shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official duties and responsibilities.

1.8.9. Shall promptly disclose fraud, waste, abuse, and corruption in accordance with University Policy.

1.8.10. Shall adhere to all laws, regulations, and policies, including those that provide equal opportunity for all persons regardless of race, color, religion, sex, national origin, age, or disability.

1.8.11. Shall endeavor to avoid any actions that would create the appearance that they are violating the law or the ethical standards of the system.

1.8.12. Shall strictly adhere to all University policies and regulations regarding sexual harassment (See Appendix II).

1.9 Ethical Conduct of Research: The University expects all those engaged in research to observe high ethical standards in the conduct of their research and, when relevant, to comply with the obligations imposed by the codes of practice as outlined by the relevant funding bodies. Ethical clearances must be gained where appropriate.

1.10 Personal Development:

1.10.1 All staff must maintain and develop knowledge and understanding of their area of expertise or professional field. They should continuously seek to improve work performance with an emphasis on quality skills.

1.10.2 All staff should actively seek out ways to bring about quality improvements in their workplaces.

Sanctions

Persons in violation of this policy shall be subject to sanctions ranging from verbal warnings to dismissal or termination. Persons who knowingly make false allegations that a faculty-student consensual relationship overlaps with a position of authority between the two shall be subject to the same sanctions.

SECTION II

Benefits, Gifts and Honoraria

Policy Statement

The University acknowledges that, relationships can develop between service providers and staff, and students and staff, and would not seek to unduly interfere with such relationships.

Members of the University Council of Ghana Christian University College and University employees may not accept benefits or gifts or offer certain benefits or gifts, except in accordance with this policy.

Reason for Policy

This policy provides strict standards on when benefits and gifts may be offered to, or accepted from third parties.

Procedures and Responsibilities

1. Benefits and Gifts

1.1 Prohibited Benefits and Gifts to University Council members and Employees

1.1.1 University Council members and employees shall not solicit, offer, confer, agree to confer, accept or agree to accept any benefit in exchange for his or her decision, opinion, recommendation, vote, or other exercise of official power or discretion.

1.1.2 Staff members should however not solicit, encourage or accept gifts or benefits, if they could be reasonably seen as an inducement to act in a particular way or to place staff members under an obligation that may either directly or indirectly compromise or influence them in their official capacity. Receipt of gifts may be perceived as an inducement by others, thus creating a potential conflict of interest. This code requires staff to avoid actual as well as potential conflicts of interest.

1.1.3 University Council members and employees who exercise discretion in connection with contracts, purchases, payments, claims, and other pecuniary transactions of government shall not solicit, accept, or agree to accept any benefit from any person the employee knows is interested in or is likely to become interested in any contract, purchase, payment, claim, or transaction involving the Council member or employee's discretion.

- i. EXCEPTION: University Council members and employees may accept food, lodging, transportation, or entertainment from persons or entities he or she knows or reasonably should know are interested in or likely to become interested in a contract, purchase, payment, claim, decision, or transaction involving the exercise of the Council member's or employee's discretion only if the Council member or employee is a "guest" as defined by Yeshua Tech Regulation. A Council member or employee is a "guest" if the person or a representative of the entity providing the food, lodging, transportation, or entertainment is present at the time the food, lodging, transportation, or entertainment is received or enjoyed by the Council member or employee.

- ii. Gifts of a nominal value (under \$ 500) in accordance with social or cultural practices are acceptable. All gifts of substantial value must be declared in writing to the Vice-President (Finance & Administration) who will decide whether the gift can be kept or should be given to the University.

1.1.4 A benefit that is otherwise allowed by University policy is nevertheless prohibited if it is offered in exchange for official action, as described above.

1.1.5 University Council members and employees who receive an unsolicited benefit that the employee is prohibited from accepting by law, may donate the benefit to a recognized tax-exempt charitable organization formed for educational, religious, or scientific purposes.

1.2 Permitted Benefits and Gifts to University Council Members and Employees

University Council members and employees may accept the following:

- (a) Gifts or other benefits conferred on account of kinship or a personal, professional, or business relationship independent of the employee's status as a Council member or employee;
- (b) A fee prescribed by law to be received by the Council member or employee or any other benefit to which the employee is lawfully entitled or for which the Council member or employee gives legitimate consideration in a capacity other than as a University Council member or employee;
- (c) Items having a value of less than \$300 or its equivalent in Ghana Cedis, not including cash or negotiable instruments; and
- (d) Plaques and similar recognition awards, including achievement and recognition awards from the University.

1.3 University employees shall disclose to their respective vice presidents any benefit received in the course of official business having a value of more than \$1000 or its equivalent in Ghana Cedis. The chancellor, presidents and agency directors shall make such disclosures to the University Council. Council members shall make such disclosures to the Council's Committee On Audit.

1.4 Council members are subject to all the requirements of University travel regulations, except as follows:

1.4.1 Reimbursement for expenses other than transportation, meals and lodging incurred by Council members while traveling on official business, may be reimbursed to Council members from gift fund accounts even though they may not be reimbursable from other funding sources.

1.4.2 When a Council member engages in travel for which compensation is to be received from any source other than University funds, the member shall not submit a claim under the provisions of University travel regulations. A Council member who receives an overpayment for a travel expense shall reimburse the University for the overpayment.

1.4.3 A request by a Council member for travel outside Ghana must be approved by the Chancellor in advance if the source of funding is money, other than gift funds or contracts and grants. Forms and procedures prescribed by the Office of the Chancellor shall be utilized.

2. Honoraria

2.1 University Council members and employees shall not solicit, accept, or agree to accept an honorarium in consideration for services they would not have been asked to provide but for their

official position or duties. This prohibition includes a request for or acceptance of a payment made to a third party if made in exchange for such services.

2.2 University Council members and employees may accept the direct provision of or reimbursement for expenses for transportation and lodging incurred in connection with a speaking engagement at a conference or similar event. Meals provided as a part of the event or reimbursement for actual expenses for meals may also be accepted. Participation by the Council member or employee in the event must be more than merely perfunctory.

3. Gifts to Public Officials

3.1 If an University member provides tickets to a public official to allow the official and/or his or her guests to attend an event, an officer or employee of the University member or the Council will serve as host to the official, and must attend the event.

3.2 University members may provide public officials with small, infrequent gifts of perishable food items delivered to their offices if such gifts are unsolicited and are not offered in exchange for action or inaction on the part of the public official.

3.3 University members may pay expenses in order to furnish information to state officials relevant to their official position, including presentations about the programs and services of the University.

3.4 University Council members and employees shall not expend or authorize the expenditure of any University funds, services or supplies for the purpose of financing or otherwise supporting the candidacy of a person for an office in the legislative, executive, judiciary or of the government of Ghana, or influencing the outcome of any election, or the passage or defeat of any legislative measure.

4. Intellectual Property and Copyright

Intellectual Property

Intellectual Property is recognized by this University and stipulates that the benefits should provide equitable returns to the originators of intellectual property, both as an incentive and reward, as well as to the University.

Copyright

Staff members should ensure that any work for which they claim authorship is original and that where it includes the works of another party, the work is appropriately acknowledged.

SECTION III

Control of Fraud, Waste and Abuse

Policy Statement

Fraud, waste and abuse of resources of any kind by employees or members of Ghana Christian University College are prohibited. The University places a strong emphasis on establishing and maintaining strong internal control Universities to assist in the prevention, deterrence and detection of fraud, waste and abuse.

Employees are required to report factual information suggestive of fraudulent, wasteful or abusive activities that may involve the University or any of its members. The University will pursue available legal remedies against persons or entities involved in fraudulent, wasteful or abusive acts against the University.

Reason for Policy

This policy is established to protect the assets, resources, and interests of the University; to increase the awareness of all employees of the possibility of fraud, waste and abuse, and to govern the reporting and investigation of allegations of suspected fraud, waste and abuse.

Procedures and Responsibilities

1. RESPONSIBILITIES OF UNIVERSITY MEMBERS

Management at all levels within the University is responsible for establishing the appropriate tone of intolerance for fraud, waste and abuse by establishing a culture founded on integrity and high ethical standards and principles as set forth in the University ethics policy. Management must display the proper attitudes toward complying with laws, policies, regulations and rules, on fraud prevention. Management should also be cognizant of the risks and exposures inherent in their area of responsibility, and should establish and maintain proper internal controls which will provide for the security and accountability of the resources entrusted to them.

2. RESPONSIBILITIES OF ALL EMPLOYEES

All employees are responsible for acting with propriety in the use of any resources of the University and to abide by laws, policies, regulations and rules of the University and its members. When suspected fraud, waste or abuse is observed by or made known to an employee, the employee is responsible for reporting that information.

3. RESPONSIBILITIES OF THE CHIEF AUDITOR

The chief auditor of the University shall have the primary responsibility for the investigation, Documentation, and reporting of all allegations of suspected fraud, waste and abuse in the University. The investigations, documentation, and reports shall be considered confidential to the extent permitted by law.

4. INVESTIGATION PROCESS

The chancellor shall insure that the University uses all available resources to investigate allegations of suspected fraud, waste and abuse. Participation among appropriate parties, including the chancellor, the president, and the Internal Audit Department, shall allow for a comprehensive and coordinated investigative process to be conducted.

5. ACTIONS

The University will pursue disciplinary and recovery actions against all employees found to have participated in fraudulent, wasteful or abusive acts as defined by this policy.

Definitions

Fraud

- any intentional act or omission designed to deceive others and resulting in the victim suffering a loss and /or the perpetrator achieving a gain. (A willful or deliberate act or failure to,
- act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical means.) For purposes of this policy, fraud and fraudulent activities include, but are not limited to, such things as:
 - Theft of any University asset including money, tangible property, time, trade secrets and intellectual property
 - Embezzlement
 - Bribery/rebate/kick-back
 - Misappropriation, misapplication, destruction, removal or concealment of University property
 - Forgery, alteration or falsification of documents
 - Conflicts of interests

Waste

– intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use or squandering of resources to the detriment of the organization. Waste also includes, incurring unnecessary costs as a result of inefficient or ineffective practices, Universitys or controls.

Abuse

– Excessive or improper use of a resource. Intentional destruction, diversion, manipulation, misapplication, or misuse of resources. Extravagant or excessive use as to abuse one’s position or authority.

Employee

– All personnel employed by the University including faculty, staff, and students who receive compensation, in either a full or part-time capacity.

Management

- Any administrator, manager, account holder, director, or supervisor who manages or supervises funds or other resources, including human resources.

Factual Information

- Information supported by observations and/or documentation.

SECTION IV

Use of University Resources

Reason for Policy

Members of the University are expected to use all University facilities and equipment efficiently, carefully and honestly. Resources should be used economically and secured against theft or misuse and waste is to be avoided. These resources should not be used for private purposes unless express permission has been granted.

Faculty and staff may not use University resources, including facilities, personnel, equipment, or confidential information, except in a purely incidental way as part of their outside consulting activities or for any other non- University purposes.

Improper use of University resources could lead to increased costs and risks to the University, particularly from operational, regulatory, and reputational standpoints. Proper utilization of University resources ensures organizational risks and costs are properly managed.

Procedures and Responsibilities

1. GENERAL

University resources may not be used for personal purposes except for incidental use in accordance with this policy. The incidental use of University resources for personal purposes must not:

- (a) result in additional expense to the University;
- (b) impede normal business functions;
- (c) be for non-approved private commercial purposes;
- (d) be used for illegal activity;
- (e) be used to intentionally access, create, store, or transmit obscene materials; or
- (f) be used to compete unfairly with private sector entities or private consultants.

Inappropriate use of University resources includes the following:

- a. Assigning the faculty member's students or staff tasks for purposes of potential or real financial gain of the faculty member, rather than the advancement of the scholarly field or the students' educational needs.
- b. Involvement of the faculty member's students or staff in his or her outside consulting or business activities without prior approval of the department chair or school dean.
- c. Granting access to external entities to Yeshua Tech resources or services for purposes outside the University's missions, or offering inappropriate favors to outside entities in an attempt to unduly influence them in their dealings with the University.
- d. Using for personal gain, or granting unauthorized access to others, of confidential information acquired through conduct of University business or research activities. Confidential information includes, but is not limited to, medical, personnel, or security records of individuals; proprietary knowledge about corporate anticipated material requirements or price actions; and proprietary knowledge of possible new sites for government operations or

information about forthcoming programs or selection of contractors or subcontractors in advance of official announcements.

- e. Providing preferential access to research results, materials or products generated from University teaching or research activities to an outside entity for personal financial gain.

Further case-specific guidance is provided below.

2. TELEPHONES AND OTHER INFORMATION RESOURCES EQUIPMENT

Incidental personal use of University computers (including, but not limited to the internet and electronic mail), telephones, facsimile machines, and other means of communication must meet the requirements of Section 1 of this policy, and must not unduly interfere with a University employee's assigned responsibilities or the normal functioning of an office. The use of University telecommunication, email, and internet services for any illegal activity or to intentionally access, create, store or transmit obscene materials, is strictly prohibited regardless of whether or not it results in an additional charge to the state.

3. UNIVERSITY VEHICLES

No University employee shall use any vehicle owned by the University for any purpose other than official business of the University. Employees may not use such vehicles in connection with any political campaign or for any personal or recreational activity including, transportation to and from work on a daily basis; however, a vehicle may be driven to an employee's home and retained overnight on specific occasions when doing so, allows the employee to effect significant time or cost savings or meet a specific out-of-town appointment to conduct University business.

4. CREDITS CARDS, PROCUREMENT CARDS, PETTY CASH, WORKING FUNDS, AND CENTRALLY-BILLED ACCOUNTS

No University employee shall use University credit cards, procurement cards, petty cash, working funds, or centrally-billed accounts for any purpose other than official business of the University. Employees may not use such accounts in connection with any political campaign or for any personal activity. An employee may use a state credit card to charge for items that, while they qualify as official business, are not fully reimbursable under state and/or University guidelines for reimbursement. An example would be a state hotel rate that exceeds the state, rate. While such an expenditure may not be fully-reimbursable, charging the full amount to a credit card or procurement card would be appropriate, even if the University will not reimburse the entire expenditure, so long as the expenditure is a valid business expenditure.

5. USE OF UNIVERSITY'S NAME FOR COMMERCIAL PURPOSES

Any requests for the use of staff's names and/or the University name for commercial purposes (eg: the endorsement of a product or process) will be considered on a case-by-case basis taking account of the University's legal position.

In order to obtain advice you should approach the Provost. This may be done direct or preferably, through your Unit Coordinator or Head of School.

6. OTHER UNIVERSITY RESOURCES

No University employee shall entrust university property or resources to any university official or employee or to anyone else to be used for other than state purposes. University employees shall not use University equipment, property, or resources for their own benefit unless:

- (a) it also benefits the University and has been approved by the chancellor or designee(s) in advance, and suitable arrangements have been made in advance for payment of the agreed upon value for use of such property or resources; or
- (b) the property or resource consists of books from the library, recreational facilities and other such items of well-established usage, that are authorized for such use by the chief executive officer of the University member concerned.
- (c) No University employee shall rent out any teaching facility (e.g. classroom, laboratory) or sports facility or open space for any monetary gain whatsoever without a written approval from the President.
- (c) The President shall include in his annual *State of the University Address* a report on the use of university resources and facilities.

SECTION V

Student Academic Ethics Policy

5.1 Introduction

Honesty, trust, and personal responsibility are fundamental attributes of the University community. Academic dishonesty by a student will not be tolerated, for it threatens the foundation of an institution dedicated to the pursuit of knowledge. To maintain its credibility and reputation, and to equitably assign evaluations of scholastic and creative performance, Ghana Christian University College is committed to maintaining a climate that upholds and values the highest standards of academic integrity.

5.2 Academic Dishonesty

Academic dishonesty involves violations of procedures which protect the integrity of the coursework completed by a student. Academic dishonesty includes, but is not limited to the following:

5.2.1 Violations of procedures which protect the integrity of a quiz, examination, or similar evaluation, such as:

- a. Possessing, referring to, or employing open textbooks or notes or other devices not authorized by the faculty member;
- b. Copying from another person's paper;
- c. Communication with, providing assistance to, or receiving assistance from another person in a manner not authorized by the faculty member;
- d. Possessing, buying, selling, obtaining, giving, or using a copy of any unauthorized materials intended to be used as or in the preparation of a quiz or examination or similar evaluation;
- e. Taking a quiz or examination or similar evaluation in the place of another person;
- f. Utilizing another person to take a quiz, examination, or similar evaluation in place of oneself;
- g. Changing material on a graded examination and then requesting a re-grading of the examination;
- h. The use of any form of technology capable of originating, storing, receiving or sending alphanumeric data and photographic or other images to accomplish or abet any of the violations listed in parts a through to g.

5.2.2 Plagiarism or violations of procedures prescribed to protect the integrity of an assignment, such as:

- a. Submitting an assignment purporting to be the student's original work which has been wholly or partly created by another person;
- b. Presenting as one's own work the ideas, representations or words of another person without customary and proper acknowledgment of sources;
- c. Submitting as newly executed work, without faculty member's prior knowledge and

consent, one's own work which has been previously presented for another class at Ghana Christian University College or elsewhere;

d. Knowingly permitting one's work to be submitted by another person as if it were the submitter's original work.

5.2.3 Falsely claiming to have completed work during an internship or class group assignment.

5.2.4 Cooperating with another person in academic dishonesty, either directly or indirectly as an intermediary agent or broker.

5.2.5 Knowingly destroying or altering another student's work whether in written form, computer files, art work, or other format.

5.2.6 Aiding, abetting, or attempting to commit an act or action which would constitute academic dishonesty.

5.3 Accusation of Discrimination

5.3.1. Employees of the University must not discriminate against or harass colleagues, students or members of the public on any grounds including sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment and HIV/AIDS. In addition, employees must not harass or discriminate on the grounds of political or religious conviction.

5.3.2 If the student believes the accusation of academic dishonesty is in whole or in part due to unlawful discrimination relating to race, religion, color, sex, sexual orientation, physical or mental disability, national origin, ancestry, or age, the student must inform the Office of University Compliance in writing of this belief immediately after an accusation has been made. The charge of unlawful discrimination shall be dealt with under the procedures set forth by the Office of University Compliance prior to or in conjunction with any consideration under the academic dishonesty procedures which follow.

5.3.3 When a student involved in an academic dishonesty case alleges as a partial or complete defense, discriminatory treatment on the part of the faculty member, then the student must at the first opportunity cite the specific treatment engaged in by the faculty member. When raising such defense, the student must also provide a summary of the constitutionally or statutorily prohibited reasons upon which he or she believes the decision or accusation was based and a detailed summary of the evidence which supports the appellant's allegation. Discriminatory treatment is defined as decisions based upon constitutionally or statutorily prohibited reasons, including unlawful discrimination.

5.3.4 Lawful Obedience: All members of the University must comply with any legislative and industrial requirements, as well as the rules and regulations of the University, upholding the principle of equal opportunities for all.

5.3.5 When a student involved in an academic ethics case alleges discriminatory treatment on the part the faculty member, the University's Director of Equal Opportunity and Affirmative Action, or his or her designee, shall serve in an advisory capacity to the committee or hearing panel at each level of appeal. All appeals alleging discriminatory treatment in cases that begin as academic ethics cases shall be pursued under the procedures set forth in this document rather than under the Ghana Christian University College "Equal Opportunity and Affirmative Action Complaint Investigation Procedure and Appeal Process."

5.3.6 In all cases, the appellant has the burden of proving his or her allegations.

5.4 Implementation Procedures

The Provost will designate the person (Provost's designee) responsible for overall administration of this policy. No statute of limitation shall exist for issues of academic dishonesty, including post-graduation situations. In the case of post-graduation issues, the same procedures and timetables as described for current students are applicable. However, before the procedures may begin, the individual in question must be located and contacted. Once located, the Office of the Provost will send a certified letter to the individual, containing all required information. When the Office of the Provost receives confirmation that the letter has been delivered, the timetable of events begins.

5.4.1 *Informal Resolution.* If a faculty member accuses a student of academic dishonesty, the faculty member must inform the student, either in person or by written notice, of the alleged violation within five (5) school days after the faculty member becomes aware of the initial circumstances giving rise to the accusation. The faculty member and student will discuss the alleged violation in a private conference within five (5) school days after the faculty member notifies the student of the accusation. The student's failure to respond to this accusation will be considered an admission of guilt.

- a. *Finding of Innocence.* If, as the result of the conference, the faculty member thinks that the student is not responsible, the matter will be closed.
- b. *Finding of Violation.* If, as a result of the initial conference, the student admits his or her academic dishonesty, the student will be required to indicate this admission in writing to the faculty member within five (5) school days following the conference.
- c. *Imposition of Punishment.* If, after receiving the written admission of a violation, an appropriate resolution and punishment is found which satisfies the faculty member and the student, written documentation of the meeting will be sent to the Provost's designee. This written documentation must be signed by both the faculty member and the student.
- d. *Disagreement as to Violation.* If, as a result of the initial conference, the faculty member thinks a violation has occurred and the student disagrees, the faculty member must notify the student in writing within five (5) school days, following the initial conference that the faculty member is proceeding with the formal resolution process.
- e. *Disagreement as to Punishment.* If the faculty member imposes punishment after a student has admitted guilt (written admission or failure to respond), the student may appeal within five (5) school days following the initial conference the appropriateness of the punishment imposed (but not his or her guilt) to the Student Academic Ethics Committee.

5.4.2 *Formal Resolution.* A faculty member's written notification to the student that he or she is proceeding with the formal resolution process, shall include a brief description (not more than five (5) pages) of the circumstances giving rise to the accusation and inform the student of his/her right to appeal. A copy of the written notice shall be given to the faculty member's chairperson. The student must respond in writing to the formal accusation within five (5) school days after receiving the faculty member's written notice.

- a. The student's written response must indicate why he/she denies the accusation and wishes to appeal.
- b. If the student fails to respond in writing within the five (5) school day period, the student shall be deemed to have admitted to the accusation.
- c. If the student denies the accusation, in writing, the faculty member shall refer the matter, in writing, to the University Academic Ethics Committee within five (5) school days from the date of the student's response. At that same time, the faculty member shall provide copies of the academic dishonesty referral to the student, department chairperson, and Provost's designee. The faculty member bears the burden of proof for establishing academic dishonesty.
- d. If the matter is not resolved informally, and if the faculty member does not refer the matter to the University Academic Ethics Committee, the student shall be deemed to be innocent of the accusation of academic dishonesty, and no punishment may be imposed.

5.4.3 *Timing of Grade.* During the formal resolution process, the student's enrollment and participation in class shall not be affected. If the student's grade in the course has not been resolved by this process and the

semester ends, the student shall receive an “Incomplete” in the course until such time as a grade can be determined pursuant to this policy. If the student has already been assigned a grade in the course at the time the student is accused of academic dishonesty, the assigned grade shall not be changed unless and until the student is determined to be guilty of academic dishonesty pursuant to this policy.

5.4.4 Course Withdrawal Withdrawal from a course when faced with an accusation of academic dishonesty in that course, does not preclude imposition of a penalty for the violation, including failure in the course. If penalty shall be determined to be course failure, the instructor may submit a Change of Grade form to the Director of Academic Affairs to replace the “W” with an “F”.

5.4.5 Multiple Offense Review. Upon receipt of a faculty member’s written notification of an informal resolution of a student academic integrity issue, or of a need for a formal resolution process and if it is found that one or more prior offenses has occurred, the Provost’s designee shall review all records and make a determination as to whether further action is warranted.

a. Informal Process Resolution. After review of past incidents, the Provost’s designee may close the matter with no further action, or may choose to impose additional penalty for the most recent violation.

b. Referral to Academic Ethics Committee. The Provost’s designee may also choose, upon review, to forward the matter to the Academic Ethics Committee for consideration of additional penalties.

c. Forwarding Cases Resolved at Informal Level. In cases where the most recent offense has been resolved by agreement of the faculty member and student, the hearing will include only the student and the hearing panel. The faculty members involved in student’s violations need not appear unless circumstances warrant faculty involvement. The hearing panel may recommend no additional penalty or may recommend penalty up to and including suspension or expulsion from the University or revocation of a previously awarded degree.

d. Forwarding Cases Resolved at Formal Level. If the determination of prior violations occurs during the Formal Resolution process (5.4.2), the process and hearing will proceed as outlined for a single offense. The hearing panel will include questioning about any other offenses and will consider the issue of multiple offenses as part of a recommendation to the Provost and Vice President for Academic Affairs for penalty.

5.5 Student Academic Ethics Committee – Composition

5.5.1 Membership. The Student Academic Ethics Committee shall be composed of seven (7) faculty members, four (4) students, the Provost’s designee, and the Director of Student Rights and Community Standards or a designee.

a. Each school dean shall appoint one (1) regular faculty member from his or her college with the academic rank of assistant professor or higher to serve on the committee;

b. The Student Parliament shall appoint four (4) students to serve on the committee. The students must be of not less than sophomore standing and shall not be on academic probation or have a record of having committed academic dishonesty. Each student must consent in writing to the University verifying to the Student Parliament that he or she meets the requirements of the preceding sentence;

c. The Provost’s designee and the Director of Student Rights and Community Standards may each designate a representative from time to time to serve in their place on the committee.

5.5.2 Term. Faculty and student members of the Student Academic Ethics.

Committee shall be appointed during spring semester of each year to serve a one (1) year term beginning the following fall semester. A faculty or student member may serve an unlimited number of terms.

5.6 Student Academic Ethics Committee: Procedures

5.6.1. Selection of Hearing Committee; Chairperson. Upon receipt of an academic dishonesty referral or an appeal, the Provost's designee shall select a Hearing Committee from among the members of the University Academic Ethics Committee. The specific members selected shall be determined at the discretion of the Associate Provost but the Hearing Committee shall be composed of five (5) voting members: three (3) faculty, two (2) students; and two (2) non-voting members: the Provost Designee, and the Director of Student Rights and Community Standards or a designee. The Provost's designee shall serve as chairperson of the Hearing committee.

5.6.2 Advisors. The student and faculty member may each be accompanied and assisted at the hearing by one advisor. However, an advisor may not address the Hearing Committee or witnesses directly. The student and faculty member shall each indicate to the Provost's designee who will serve as his or her advisor at least twenty-four (24) hours before the hearing.

5.6.3 Notice of Hearing. The Provost's designee shall establish the time, date, and place that the academic dishonesty referral or appeal will be heard by the Hearing Committee and shall give at least ten (10) school days prior written notice thereof to the student and to the faculty member. The notice shall include the names of the persons who will serve on the Hearing Committee and shall briefly state the nature of the accusation and the circumstances giving rise to the accusation. The date of the hearing shall be not more than twenty (20) school days after the faculty member's written notice or the student's appeal was received by the office of the Provost's designee. In the case of an absent faculty member, the department chairperson, with consent of the absent faculty member, shall appoint a faculty member from the department or himself or herself to represent the faculty member at the hearing.

5.6.4. Quorum. All of the voting members of the Hearing Committee must be present to constitute a quorum, unless a vacancy occurs, as provided in 7.5.5, but a majority of the voting members present, whether or not a quorum exists, may adjourn any meeting to another time or date.

5.6.5 Disqualification; Challenges. Any Hearing Committee member shall disqualify himself or herself if he or she has a conflict of interest with the case or the student or a personal bias relevant to the case. The student may challenge a Hearing Committee member on the grounds of conflict of interest or personal bias. The decision whether to disqualify a challenged member shall be made by a majority vote of the remaining members present. If a challenge is upheld, the Provost's designee may, at his or her discretion, either appoint another person to fill the vacancy or direct that the vacancy not be filled. In the latter case, a quorum shall thereafter consist of all remaining voting members of the Hearing Committee.

5.6.6. Witnesses. The student and the faculty member may invite persons who have information relevant to the accusation to present testimony at the hearing; however, the chairperson of the Hearing Committee may limit the number of witnesses to avoid repetition and cumulative testimony. The witnesses must be affiliated with the University and knowledgeable about the academic dishonesty accusation. Each party shall be responsible for insuring the presence of his or her witnesses at the hearing and shall be prohibited from submitting a written statement in lieu of personal testimony of a witness unless the chairperson of the Hearing Committee determines that the witness is unavailable to testify. The student and the faculty member must provide the names of all witnesses who may testify at least twenty-four (24) hours before the scheduled time of the hearing to the Office of the Provost's designee. All witnesses who testify, as well as the student and the faculty member, may be questioned by any member of the Hearing Committee concerning any matter relevant to the issues before the Hearing Committee. Witnesses invited by either party shall be present only while they are testifying.

5.6.7 Materials Used in the Hearing. The student must provide a written statement of no more than five (5) pages outlining the basis of the appeal and provide any supporting documentation. The faculty member will provide the original written notification and any additional supporting materials. All documentation must be received in the Office of the Provost no less than five (5) school days prior to the hearing. All documents shall be distributed to both parties and the Hearing

Committee no less than twenty-four (24) hours in advance of the scheduled hearing.

5.6.8 Conduct of the Hearing. The hearing shall be conducted without reference to rules applicable to a court of law concerning the examination of witnesses and admissibility of evidence, but with a view to providing the Hearing Committee with a complete understanding of the facts involved. Each party shall be granted up to thirty (30) minutes to present relevant information to the Hearing Committee. Time used by witnesses shall count toward those thirty minutes (excluding time spent questioning the witness by the Hearing Committee). Decisions of the hearing committee shall be made by a majority vote. The Hearing Committee may delay judgment if the faculty member (or his/her representative) or the student is not available for a legitimate reason.

5.6.9 Confidentiality of Appeal Hearing. The Hearing Committee members shall return any personal files, materials received during the appeals procedure, or notes taken during the meetings of the Hearing Committee to the Chairperson of the Hearing Committee, once the process is complete. No member of the Hearing Committee, or other participant or observer in the appeal procedure shall reveal any facts, documents, or testimony gained through participating in or observation of the hearing to any other person, unless required by a court of law to do so or upon the advice of the University's legal counsel.

5.7 Hearing Committee: Determination/Recommendations

5.7.1 Determination and Recommendation of the Hearing Committee. The Hearing Committee's determinations shall be based solely on the evidence presented or summarized at the hearing, as well as the testimony provided by the student, faculty member, and witnesses; however, the Hearing Committee may take official notice of matters which would be within the general experience or knowledge of faculty or students of the University. The Hearing Committee shall complete the following tasks:

- a. determine the guilt or innocence of the student (if not previously determined);
- b. determine the recommendation for punishment if the student is determined to be guilty or the student admitted guilt in writing, or the only issue before the Hearing Committee's is the punishment to be imposed. The Hearing Committee may consider any prior instances of academic dishonesty by the student in determining its recommendation for punishment.
- c. meet in one or more private sessions after the conclusion of the hearing for the purpose of preparing the written summary of the evidence presented, findings, and recommendation for punishment for delivery to the Provost and Vice President for Academic Affairs.

5.7.2 Determination of Innocence. If the Hearing Committee determines that the student is innocent of the accusation, the accusation shall be dismissed and the Hearing Committee shall request the faculty member involved to assign a grade to the student based upon the student's academic performance. If the student thereafter disagrees with the grade assigned, the student may appeal the grade through the University's grade appeal procedure. The Hearing Committee shall give its written summary of evidence presented and its written findings of innocence to the Provost and Vice President for Academic Affairs. A copy of the summary and findings of innocence shall at the same time be given to the student, faculty member, the faculty member's department chairperson, and the faculty member's dean.

5.7.3 Determination of Guilt: Findings and Recommendation to Provost and Vice President for Academic Affairs. If the Hearing Committee determines that the student is guilty of the accusation, if the student has admitted guilt in writing, or if the only issue before the Hearing Committee is the punishment to be imposed, the Hearing Committee shall give its written summary of the evidence presented, its written findings, and its recommendation for punishment to the Provost and Vice President for Academic Affairs. A copy of the summary, findings, and recommendation for punishment shall at the same time be given to the student, the faculty member, the faculty member's

department chairperson, and the faculty member's dean.

5.7.4 Appeal to the Provost and Vice President for Academic Affairs. The faculty member or the student may appeal the Hearing Committee's decision to the Provost and Vice President for Academic Affairs. To be considered by the Provost and Vice President for Academic Affairs, such appeals must be received by the Office of the Provost and Vice President for Academic Affairs within five (5) school days after the date the Hearing Committee's summary, findings, and recommendations are given to the student, the faculty member, the faculty member's department chairperson, and the faculty member's dean. The decision of the Provost and Vice President for Academic Affairs is final.

5.7.5 Action by Provost and Vice President for Academic Affairs. After receipt of the Hearing Committee's summary, findings, and recommendation and any written comments timely submitted by the faculty member or student, the Provost and Vice President for Academic Affairs may: (1) approve the determination and recommendation of the committee; (2) overrule or modify the committee's recommendation for punishment; or (3) refer the matter to the Hearing Committee for such action as the Provost and Vice President for Academic Affairs may direct. If the Provost and Vice President for Academic Affairs refers the matter to the Hearing Committee, the results of the Hearing Committee's further actions shall be communicated to the Provost and Vice President for Academic Affairs for final decision.

5.8 Punishment

5.8.1 By Faculty Member. A faculty member may impose punishment for academic dishonesty up to and including failure in the course.

5.8.2 By Provost and Vice President for Academic Affairs. After receipt of the Hearing Committee's summary, findings and recommendation, the Provost and Vice President for Academic Affairs may impose punishment up to and including suspension or expulsion from the University or revocation of a previously awarded degree.

5.9 Records of Academic Dishonesty

5.9.1 Records in Case with No Adverse Finding. If a student is determined or deemed to be innocent of an accusation of academic dishonesty, and any appeal of that decision has been concluded with no change in judgment, all materials concerning the accusation that are in the possession of the University or any University faculty or staff member shall be destroyed, except that any student work product involved in the dispute shall be evaluated, retained, returned to the student or otherwise handled as required by the original assignment.

5.9.2 Records in Case with Adverse Finding. If an academic dishonesty proceeding concludes, after any available appeals, in a finding that there was academic dishonesty of any type in any degree, or if a case is resolved by informal resolution under 7.4.1., with a stipulation by the student that there was academic dishonesty of any type in any degree, the records of the proceedings shall be maintained in accordance with Subsection 7.9.3.

5.9.3 Maintenance of Records. Records of any proceeding described in Section 7.9.2 shall be maintained in a separate file, identified by the name of the student. The records shall include all materials used in the hearing, as well as findings of violation and imposition of punishment as a result of informal resolution under Section 7.4.1. All materials in a student's academic dishonesty file will be destroyed five (5) years after the case is resolved or when the student graduates from Ghana Christian University College, whichever date comes later. However, if at the conclusion of this holding period, the materials are relevant to pending or threatened litigation, the Provost and Vice President for Academic Affairs may direct that destruction of the materials be delayed until

such litigation is concluded. Access to or release of the materials will occur only with the prior written consent of the student.

5.9.4 *Transcripts*. Other than the grade finally assigned in a course, a student's academic dishonesty shall not be recorded on the student's transcript unless the student is expelled from the University or a previously awarded degree is revoked.

5.10 Miscellaneous

5.10.1 *Action by Designee*. Whenever an action may be or is required to be taken under this policy by the Provost and Vice President for Academic Affairs, the Director of Academic Affairs, or the Dean of Students and Communities, the action may be taken by that person's designee.

SECTION VI

General Code of Conduct for Students

Any student found to have committed or to have attempted to commit the following offenses.

6.1 Offenses Against Persons

6.1.1 Harassment – Conduct towards another person or identifiable group of persons that has the purpose or effect of (a) creating an intimidating or hostile educational environment, work environment, or environment for participation in a University activity; (b) unreasonably interfering with a person’s educational environment, living environment, work environment, or environment for participation in a University activity; or unreasonably affecting a person’s educational or work opportunities or participation in a University activity.

Ghana Christian University College is committed to maintaining an environment within the University that is free from harassment. Harassment in such forms as sexism, racism or bullying is inconsistent with the University's Equal Opportunity Policy and denies respect for the rights of staff and students to fair treatment. Harassment is unlawful and can also be harmful to organisational effectiveness.

6.1.2 Hazing - Any mental or physical action, requirement, or request of, or obligation placed upon any person (including but not limited to a pledge, associate member, affiliate, prospective member, guest, initiate or team member) which could be harmful to the health, welfare or academic progress of the person, or which is personally degrading to the individual involved, or which has an adverse effect on the academic progress of the person, or which violates any federal, state, or local laws or University policy. Individual acceptance of or acquiescence to any activity covered by the foregoing definition in no way validates or excuses the activity.

6.1.3 Physical Abuse - Physical harm of any person or persons or threat of physical harm of any person or persons which causes that person to be reasonably apprehensive of physical harm.

6.1.4 Privacy Violation - Use of audio, video or photographic devices to make an image or recording of an individual without that person's prior knowledge, or without that person’s effective consent when such image or recording is likely to cause injury or distress as determined by a reasonable person. This includes but is not limited to, surreptitiously taking pictures of another person in a private area such as a residence hall room, a public or private restroom, or a dressing/locker room.

6.1.5 Sexual Misconduct –Sexual intercourse or sexual touching, however slight, by one person upon another without effective consent or when it involves compelling a person to submit to such conduct by force, threat of force, use of intoxicants to impair a victim’s ability to give consent or otherwise taking advantage of any impairment which might render a person incapable of making a reasonable or rational decision about sexual activity. As defined by the State of Indiana, sexual misconduct also includes any sexual act when the person is not of legal age.

6.1.6 Stalking - Intentional repetitious or continuous actions that would cause a reasonable person to feel frightened, harassed, annoyed, threatened, or alarmed and that cause the person who is the object of the stalking to feel frightened, harassed, annoyed, threatened, or alarmed. Such actions

could be either implicit or explicit threats against a specific person; an acquaintance, friend, family member, or pet of that person; or that person's property.

6.2. Offenses Related to the Operation of the University

6.2.1 Academic Dishonesty.

6.2.2 Aiding and Abetting - Knowingly, recklessly or willfully encouraging or assisting others to commit acts prohibited by this code.

6.2.3 Computer Misuse - Any behavior violating policies governing the use of the University's computer system and related equipment/technology.

6.2.4 Disorderly Conduct - Conduct that is disruptive of campus life or University activities, or that is a matter of public indecency, or a breach of the peace.

6.2.5 Failure to Comply - Failing to comply with verbal or written instructions of University officials acting in the performance of their duties and made within the scope of their authority, or failing to identify oneself upon request of a University official.

6.2.6 False Information - Intentionally submitting false information, verbally or in writing, to a University official or office.

6.2.7 Fraudulent Use - Forgery, alteration, taking possession of or the unauthorized use of University documents, records, keys or identification without the consent or authorization of appropriate University officials.

6.2.8 Interference with a Reprimand - Obstructing or interfering with the reprimand, discipline or apprehension of another person who is involved in a violation of this Code or any other University rule or regulation.

6.2.9 Obstruction or Disruption - Obstructing or disrupting the teaching and/or learning process in any campus classroom, building, or meeting area, or any University-sponsored activity, pedestrian or vehicular traffic, classes, lectures or meetings, obstructing or restricting another person's freedom of movement, or inciting, aiding, or encouraging other persons to do so.

6.2.10 Residence Hall Policies - Violating residence hall rules and regulations, or the housing contract.

6.2.11 Solicitation - Engaging in solicitation of any type on University property without appropriate authorization.

6.2.12 Violation of the Law - Committing or attempting to commit any act that would be a violation of local, state or federal law on or off University property, when such behavior is judged by the Office of Student Rights and Community Standards, to be detrimental to the University's educational process or objectives.

6.2.13 Other Policy Violations - Violating any other published University policies not specifically a part of this Code.

6.3 Offenses Against Property

6.3.1 Misuse of Property – Trespass, occupancy of, unauthorized entry into, possession of, receipt of or use of the property of another person, of the University or of University services, facilities or resources including, but not limited to, the University’s name, seal or insignia.

6.432 Theft, Vandalism - Attempted or actual theft, vandalism, unauthorized use, possession, damage to, or destruction of public property, University property or personal property.

6.4 Offenses Involving the Judicial Process

6.4.1 Improper Influence - Attempting to influence the decision of a member of a Judicial body or a designated judicial officer, or attempting to discourage that person’s participation in a judicial proceeding.

6.4.2 Intimidation of Participants - Attempting to intimidate, coerce or influence a witness, complainant or other persons participating in the judicial process.

6.4.3 Providing False Testimony - Providing false testimony or false information in the judicial process or knowingly making unfounded accusations against another individual.

6.4.4 Sanction Non-compliance - Failing to complete or to comply with a disciplinary sanction.

SECTION VII

Conflict of Interest (including Conflict of Interest in Research)

7.1 Introduction

This policy covers all full-time and part-time employees of the University. The policy specifically excludes contractors and adjunct faculty. Individuals covered under this policy are required to complete the attached disclosure statement.

The purpose of this procedure is to clarify the responsibilities of staff members with respect to conflicts of interest. The term ‘conflict of interest’ refers to a situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of public duty versus private interests. This procedure will help to ensure that if an actual or reasonably perceived conflict exists between a staff member's interests and their University duties and responsibilities, the conflict of interest will be managed in an appropriate manner.

7.2 General Definitions

Close personal relationship: A relationship between a staff member and a relative, a financially dependent person, a close friend, a de facto partner or any person with whom there is currently, or has been, an intimate relationship. This does not include a working relationship which exists due to ordinary collegiate academic collaboration, where the colleagues are not relatives, financially dependent, or de facto or intimate partners.

Conflict of commitment: This occurs when one interest of a staff member, which may, or may not be a private interest or non-University interest, may harm or interfere with the productivity or involvement of that staff member in aspects of their University responsibilities. It may concern the staff member’s distribution of efforts between employment obligations to the University and to outside activities. *Conflicts of commitment can occur in research* where the staff member’s non-University’s activities harm or interfere with the staff member's research obligations.

Conflict of Interest Advisory Officer (CIAO): For the purpose of this procedure, the Director of HR acts as a CIAO for all instances of general conflicts of interest and the Provost acts as the CIAO specifically for conflicts of interest in research. The CIAO provides advice and assistance in the resolution of potential conflicts of interest, that are unable to be resolved between the relevant parties.

Conflicts of interest in research: This includes an actual, perceived or potential conflict of interest which may compromise, or have the appearance of compromising, a staff member's ethical behaviour and professional judgment in the conduct and reporting of that research. It is critical that such conflicts are appropriately managed as they can compromise the validity and integrity of the research process and undermine public confidence in the institution.

Dean or Divisional Director: The Dean or Divisional Director or, where applicable, a person acting as his or her nominee.

Financial interest: Any employment, business activity or other right, claim, title or legal share in something that has a monetary, or equivalent value. Examples of financial interest include, but are not limited to, shares, share options, dividends, and the right to receive remuneration or other benefits such as salaries, director's fees, consulting fees, allowances and discounts.

Head of Unit or Director: The Academic Head of Unit (department or school) or Director (head of administrative unit) or, where applicable, a person acting as his or her nominee.

Non-financial interest: Any community or other voluntary activity or involvement including with a sporting club, church, political party or other formal or informal association or group.

University: The term University includes Yeshua Tech controlled entities.

University Integrity Committee or its equivalent: A committee set up to monitor the effectiveness of University policies and processes, and ensure the University conducts its activities with due probity and transparency.

7.3 Defining Conflict of Interest

The term 'conflict of interest' refers to a situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of public duty versus private interests. This refers to a reasonably perceived, potential or actual conflict of interest. Conflicts of interest can involve financial or non-financial interests of the staff member and the interests of a business partner or associate, family member, friend or person in, or has had a close personal relationship with the staff member.

The potential for a conflict of interest arises when an employee is placed in a situation where private interests could influence or appear to influence judgments made during the course of his/her professional duty to the University.

Staff members should take suitable measures to avoid, or appropriately deal with any situation in which they may have, or be seen to have, a conflict of interest that could, directly or indirectly, compromise the performance of their duties. When staff members become aware of such a situation they should take appropriate steps to disclose the conflict. Failure to do so and continuation of such a conflict of interest may lead to disciplinary action.

Examples of relationships that may cause conflicts of interest are, positive and negative emotional relationships (including all sexual relationships and antagonisms) and financial relationships, etc.

Yeshua Tech is committed to avoiding employee conflicts of interest. Conflicts of interest arise when an employee's personal economic activities, or those of the employee's family, conflict with the employee's responsibilities, loyalty and actions in his or her capacity as an employee of the University. Yeshua Tech employees are compensated for devoting full business time and attention to the success and growth of the University. The private business activities or interests of the employee, or employee's family, may in some cases conflict with the best interests of the University.

A conflict of interest may arise, for example, through:

- Holding, either directly or indirectly, a position of financial interest in an outside concern, that provides services competitive with services rendered by Yeshua Tech, or an outside concern from which the University secures goods or services if the employee is involved in or may influence the ordering of such goods and services.
- Any activity which interferes with the full performance of the employee's professional or institutional responsibilities or obligations.

- Using University resources to benefit an outside concern (this could include employee time, University space, equipment, supplies, etc.)
- Disclosing confidential or proprietary information obtained through Yeshua Tech employment for personal profit or gain, or for the profit or gain of a family member.
- Accepting gratuities or special favors such as meals, airline tickets, hotel accommodations, entertainment, sporting event tickets, etc. from any outside concern that does, or is seeking to do business with Yeshua Tech, or extending gratuities or special favors to employees of the University, under circumstances which might reasonably be interpreted as an attempt to influence employees in the performance of their duties. This does not include the acceptance of items of nominal or minor value (\$100 or less) that are clearly tokens of respect or friendship and are not related to any particular transaction of the University, nor does it include business-related social events where the employee is representing the University's interests.
- Engaging in outside activities from which employees, their families, or their businesses will gain financially because of the employee's position at Yeshua Tech.

The individual disclosure statements and the annual reports compiled by the Vice President (Finance & Administration) shall be confidential, but shall be open for inspection by the Senate and the President. The statements and reports or the information contained therein shall be open for inspection by the public only: (a) by official action of the President upon showing of good cause; (b) with the consent of the person who submitted the data which is to be disclosed; (c) by court order; or (d) as otherwise required by Yeshua Tech.

7.4 Outside Employment and Private Practice

Members of the academic staff of the University are encouraged to undertake contract research, consultancy and other similar professional external jobs, provided that this is not done in a way which would conflict with the interests of the University and should be of a standard which would enhance the name and image of the University and the professional reputations of the staff involved.

Academic staff may undertake private consultancies provided this does not interfere with the time commitment of duties and responsibilities associated with the staff member's employment with the University. It must be clearly understood that the University accepts no responsibility for the consultancy work of staff members when they are acting in a private capacity.

For academic staff, participation in consultancy work, be it University or private, or contract research, whether University based or private, requires the approval of the Dean on the advice or recommendation of the Head of Unit.

7.5 Avoidance of conflicts of interest

Staff members must avoid being placed in a situation where they are taking action, making a decision or have the ability to influence any action or decision of the University that involves a conflict of interest, or the reasonable perception of a conflict of interest. Likewise, staff members must avoid conflicts of commitment that impair their ability to fulfill their duties at the University. For example, this might arise where a staff member:

- or a member of their immediate family has a direct or indirect financial interest, or holds a directorship, in a company which supplies goods and/or services to the University, or which operates in competition with the University;
- accepts gifts of value, grants and/or favours from persons who would benefit from influencing staff, such as students, job applicants or suppliers;
- is involved in the admission, supervision, assessment or examination of students with whom he/she has, or has had, a close personal relationship;

- takes part in any recruitment, promotion, reclassification, evaluation or grievance process with prospective or current staff members or is in a supervisory role with respect to another staff member, with whom he/she has, or has had, a close personal relationship;
- uses University assets or confidential University information for their personal gain, or for the benefit of a person with whom the staff member has a close personal relationship or organisation with whom the staff member has a non-financial or financial interest;
- takes part in assessing a tender application where he or she has, or has had, a close personal relationship with a person, or organisation with whom the staff member has a non-financial or financial interest, that has submitted a tender application;
- undertakes research/clinical trials which are sponsored by a company in which the researcher (or an associate of the researcher) has a financial interest or holds an executive position;
- holds an equity interest or executive position in a start-up company that has contracted with the University to conduct further research;
- chairs a committee responsible for allocating internal funding for research at a faculty or University level, takes part in the decision-making process that grants funding to the chair's own school/department/faculty; and
- undertakes paid or unpaid outside work that impacts on their ability to fulfill their duties and obligations at the University.

As soon as a staff member becomes aware that he or she has a conflict of interest or a potential conflict of interest in the process of negotiating or making a decision on a transaction or other action in his or her professional capacity, he or she must immediately declare it and, unless resolved, take no further part in any negotiation or decision on the subject.

7.6 Register of Interests

The Provost will maintain a Register of Interests, which may be consulted for good reason by senior members of staff.

It applies to heads of academic Departments, Directors of Research Centres, Professors, Divisional Heads in the University and other members of the academic and related senior staff, who should give written details to the Provost for inclusion in the Register of the following:

- Remunerated employment outside the University
- Relevant directorships, trusteeships or similar positions
- Positions of authority within any other organization, whose decisions may have an impact on the University
- Other relevant interests

7.7 Disclosure of conflicts of interest

The primary obligation is to disclose the potential conflict of interest **in advance**. Failing to disclose a potential conflict of interest appropriately could be regarded as misconduct.

If a staff member believes or suspects that a conflict of interest exists or potentially exists, the following steps must be taken.

- A staff member must immediately disclose any conflict of interest to his or her Head of Unit or Director using the [Disclosure of conflict of Interest Form](#) provided for that purpose.
- If a staff member is in doubt as to whether a conflict exists, he or she should seek advice from their respective Head of Unit or Director.
- If the Head of Unit or Director believes a conflict of interest exists, then he/she must direct the staff member to complete a Disclosure of Conflict of Interest Form.

- If the Head of Unit or Director is in doubt as to whether a conflict of interest exists, he or she should seek advice from the respective Dean or Divisional Director to whom he or she reports. The Dean or Divisional Director will then determine whether the staff member is required to submit a Disclosure of Conflict of Interest Form.

If a Dean or Divisional Director has a conflict of interest, he or she must seek advice from the officer to whom they report.

A member of the President's Group, a Dean, a Divisional Director or a Conflict of Interest Advisory Officer (CIAO) may refer a conflict of interest matter to the University's Integrity Committee or its equivalent for consideration and resolution.

The University Integrity Committee or its equivalent may also request that, a conflict of interest be brought to it for further consideration and resolution.

7.8 Management of conflicts of interest

Once a conflict of interest is identified and the individual concerned has completed and submitted the Disclosure of Conflict of Interest Form, the Head of Unit or Director and staff member, must devise an appropriate plan to resolve or manage the conflict of interest.

A management plan states matters including:

- the nature of the staff member's personal interest;
- the interest/s of the University with which the staff member's personal interest do or could conflict;
- the likelihood of the interests actually coming into conflict;
- the decisions or actions which the staff member agrees to avoid doing and participating in; and
- the decisions or actions which it is agreed the staff member can take or do.

In developing this plan, any party to the conflict of interest may consult with the relevant CIAO for guidance and assistance. Once a management plan is devised it must be:

- signed by all parties and placed on the staff member's personal file; and
- reviewed annually at the time of the performance review or on an as needs basis.

All documents should be marked "confidential" and access strictly limited to those employees who need access for official purposes.

7.9 Management of potential conflicts of interest

Requests for consideration of a potential or actual conflict should:

- outline (in writing) all the relevant facts, including the parties concerned, the nature of the conflict of interest and the reason(s) for requesting advice; and
- be forwarded to the relevant CIAO.

The CIAO may attempt to resolve the disagreement or refer it to the University Integrity Committee or its equivalent.

Where the conflict of interest matter is referred to the University Integrity Committee, it should meet and report to the CIAO, within fourteen days of a written request being received, or such further time as agreed with the CIAO.

The University Integrity Committee or its equivalent should:

- advise the CIAO on whether a conflict of interest exists; and
- if so, provide direction on how the conflict of interest should be managed.

7.10 Conflicts of interest in research

The University adopts an internally recognized code which recommends that researchers:

- maintain records of activities that may lead to conflicts, for example: consultancies; membership of committees, boards of directors, advisory groups, or selection committees; and where they hold financial delegation or are in receipt of cash services or equipment from outside bodies; and
- when invited to join a committee or equivalent, review current activities for actual or apparent conflicts and bring possible conflicts of interest to the attention of those running the process.

Researchers should also be aware of and comply with any separate requirements for disclosure of conflicts of interest, from funding bodies.

Commercialisation of research is increasingly important to the University, and it is recognised that substantial benefits can arise from collaborations and relationships with industry in the licensing and marketing of research discoveries and in the creation of spin-off companies. These activities may also be a source of potential conflicts of interest which need to be appropriately managed.

7.11 Failure to comply with conflict of interest procedure

Failure to comply with this procedure or the directions of the Head of Unit, Director or the University Integrity Committee or its equivalent may result in disciplinary action in accordance with the provisions of the relevant enterprise agreement and contract of employment, including possible dismissal in cases of serious conflict of interest or other serious misconduct.

Failure of researchers to comply with this procedure may also result in loss of funding for the University.

Responsibility

All University staff including honorary appointees of the University and staff of Yeshua Tech controlled entities should:

- be aware of, read, understand and comply with this procedure;
- assess their own private and personal interests and whether they conflict or have the potential to conflict with the University's interests, including their own duties as staff members;
- manage any actual or potential conflicts of interest in accordance with this procedure; and
- where appropriate be aware of additional, current requirements linked to research.

Heads of Unit and Directors should:

- be aware of this procedure and make staff aware of the procedure;
- be aware of areas of conflict of interest within their area of responsibility, assess risks and advise the Dean or Divisional Director;
- disclose any conflicts of interest;
- assist staff who have queries about potential or actual conflicts of interest;
- support staff of their unit to manage any actual or potential conflicts of interest; and
- seek advice or support from the Dean or Divisional Director, or the relevant CIAO where necessary.

Deans and Divisional Directors should:

- be aware of this procedure and ensure Heads of Unit and Directors are aware of this procedure;

- be aware of areas of conflict of interest within their area of responsibility and advise CIAO of risk areas;
- disclose any conflicts of interest;
- provide advice to their staff on the management of conflicts of interest;
- support staff of their faculty/division to manage any conflicts of interest;
- review and endorse plans to manage any conflicts of interest; and
- seek advice or support from the relevant CIAO where necessary.

Conflict of Interest Advisory Officers (CIAO) should:

- alert the University Integrity Committee or its equivalent to any instances of institutional conflicts of interest;
- receive queries in relation to conflicts of interest;
- provide advice to the parties on the management of the conflict of interest;
- assist in the resolution of conflicts of interest that are unable to be resolved between the relevant parties;
- refer matters which cannot be immediately resolved to the University Integrity Committee;
- annually review the application of this Conflict of Interest Procedure, and report to the University Integrity Committee or its equivalent; and
- ensure provision of appropriate training including induction training for staff.
-

The University Integrity Committee or its equivalent should:

- receive reports from the CIAO in relation to conflicts of interest (including institutional conflicts of interest);
- meet and report to the CIAO within fourteen days of a written request being received, or such further time as agreed with the CIAO;
- advise the CIAO on whether a conflict of interest exists;
- provide direction in relation to the way in which the conflict of interest is to be managed;
- build an organisational culture that supports implementation of the policy and procedures with guidance, training and fair enforcement of the procedure; and,

report annually to the University Council on the operations of the procedure.

7.12 Organizational Code of Ethics

The University and its employees must, at all times, comply with all applicable laws and regulations. The University will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The University does not permit any activity that fails to stand the closest possible scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the University's activities.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek the advice of the Human Resources Department.

Kickbacks and Secret Commissions

Regarding the University's business activities, employees may not receive payment or compensation of any kind, except as authorized under Yeshua Tech remuneration policies. In particular, the University strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

University Funds and Other Assets

Employees who have access to University funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the University's instructional manuals or other explanatory materials, or both. Yeshua Tech imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or the Human Resource Department, so that, Yeshua Tech can promptly investigate further.

When an employee's position requires spending University funds or incurring any reimbursable personal expenses, that individual must use good judgment on the University's behalf to ensure that good value is received for every expenditure. University funds and all other assets of Yeshua Tech are for University purposes only and not for personal benefit. An employee engaging in outside activity shall not use the facilities, equipment, supplies or services of Yeshua Tech in connection with such outside activity. Approval of the use of Yeshua Tech facilities, equipment, supplies or services, may be conditioned upon reimbursement to the Yeshua Tech for such use.

Organization Records and Communications

Accurate and reliable records of many kinds are necessary to meet the University's legal and financial obligations and to manage the affairs of Yeshua Tech. The University's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and record keeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

If an employee becomes aware of a situation that involves inaccurate accounting or record keeping, the employee is encouraged to directly contact the Finance Committee of the Council or the outside audit firm to disclose the irregularity.

Dealing With Outside People and Organizations

Employees must take care to separate their personal roles from their University positions when communicating on matters not involving Yeshua Tech business. Employees must not use organization identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve Yeshua Tech business, employees must not presume to speak for the University on any topic, unless they are certain that the views they express are those of the University, and it is the University's desire that such views be publicly disseminated.

When dealing with anyone outside Yeshua Tech, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the University, or any outside individual, business, or government body.

Prompt Communications

In all matters relevant to students, suppliers, government authorities, the public and others in the University, all employees must make every effort to achieve complete, accurate, and timely communications—responding promptly and courteously to all proper requests for information and to all complaints.

Privacy and Confidentiality

When handling financial and personal information about students or others with whom the University has dealings, observe the following principles:

1. Collect, use, and retain only the personal information necessary for the University's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
2. Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
3. Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

VIII

Staff-Student Relationships

8.1. Preamble

Interactions between the faculty and students at Ghana Christian University College are guided by mutual trust, confidence, and professional ethics. Professional faculty-student relationships have a power differential between faculty members and students; personal faculty-student relationships carry risks of conflict of interest, breach of trust, abuse of power, and breach of professional ethics.

As an academic University, professional relationships between staff and students which facilitate learning, research and the exchange of ideas should be facilitated and encouraged. The purpose of this procedure is to explain the expectations of staff members with respect to their dealings with students, including relationships with students. The nature of the student / teacher relationship or student / supervisor relationship imposes particular responsibilities and duties on the staff member. Because of the staff and student roles, a staff member has power over a student even if students are of a similar age to the staff member. Staff must ensure that they exercise this power in a respectful and fair manner, and that they avoid sexual harassment, bullying, favouritism and exploitation.

The University is a community of adults, in which close personal relationships between adults may take place legally, subject to some conditions. This procedure will help to ensure that the expectations of staff are clear and, to ensure that if a close personal relationship does exist or develop between a staff member and student, that relationship will be managed in an appropriate manner.

The principles in the Ghana Christian University College Ethics Statement, support the obligation on staff to conduct themselves professionally and appropriately in their dealings with students. It states that mutual respect and the responsible exercise of power are fundamental to the way we treat each other. It states that we respect the inherent dignity of all individuals, and we promote the empowerment of individuals through learning.

Policy

Faculty members shall not engage in consensual relationships with students whenever a faculty member has a professional "position of authority" with respect to the student in such matters as teaching a course or in otherwise evaluating, supervising, or advising a student as part of a school programme. Should a consensual relationship develop, or appear likely to develop, while the faculty member is in a position of authority, the faculty member and/or the student shall terminate the position of authority. Even when the faculty member has no professional responsibility for a student, the faculty member should be sensitive to the perceptions of other students, that a student who has a consensual relationship with a faculty member may receive preferential treatment from the faculty member or the faculty member's colleagues.

8.2. Definitions

Close personal relationship: A relationship between a staff member and a prospective or current student of Ghana Christian University College, who is also a relative, a financially dependent person, a close friend, a

de facto partner or any person with whom there is currently, or has been, an intimate relationship, **and** where there is actual, potential, direct or indirect teaching, research or other professional contact of any sort between the staff member and the student. This does not include a working relationship which exists due to ordinary collegiate academic collaboration where the colleagues are not relatives, financially dependent, or de facto or intimate partners.

Conflict of interest: The term ‘conflict of interest’ refers to a situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of public duty versus private interests. **This refers to a reasonably perceived, potential or actual conflict of interest.** Conflicts of interest can involve financial or non-financial interests of the staff member and the interests of a business partner or associate, family member, friend or person in a close personal relationship with the staff member.

Dean: The Academic Head of Unit (school).

Head of Department or Director: The Academic Head of Unit (department) or, where applicable, a person acting as his or her nominee.

Inappropriate close personal relationship: A close personal relationship between a staff member and a student which involves:

- a breach of any University policy or procedure;
- a breach of the University Ethics Statement;
- conduct inappropriate to the student/teacher and student/supervisor relationship;
- conduct inconsistent with the duty of care that academic staff owe to students;
- sexual harassment;
- bullying; and/or
- exploitation.

Financial interest: Any employment, business activity or other right, claim, title or legal share in something that has a monetary or equivalent value. Examples of financial interest include, but are not limited to, shares, share options, dividends, and the right to receive remuneration or other benefits such as salaries, director’s fees, consulting fees, allowances and discounts.

Professional and appropriate: For the purpose of this procedure, ‘professional and appropriate’ conduct: is consistent with the Ghana Christian University College Ethics Statement, all policies and procedures and University Statutes; is of a professional nature; is appropriate to the student/teacher and student/supervisor relationship; is consistent with the duty of care that staff owe students; and demonstrates care, diligence, integrity and respect for students.

Staff: All University staff including adjunct and conjoint appointments.

Student: The term ‘student’ includes all undergraduate and post graduate students, full time and part time students, students studying on or off campus or online, whether they are currently enrolled in subjects or deferred from their studies. It does not include graduates of Ghana Christian University College or persons who are not currently admitted as students.

University: The term ‘University’ includes Yeshua Tech-controlled entities.

Faculty, for purposes of this policy only, consists of all full- or part-time faculty, teaching assistants, members of dissertation committees, and all other personnel who teach, evaluate, allocate financial aid to, or guide research by students.

Students are all full- or part-time students.

A consensual relationship is any dating, romantic, sexual, or marriage relationship.

Position of authority includes but may not be limited to situations in which the faculty member makes or is responsible for an evaluation of a student for admission, coursework, promotion, financial aid, research funding, suspension, expulsion, or other discipline. (Faculty members providing instruction without evaluation are not necessarily in positions of authority.)

8.3. Obligations on staff

Academic staff members are trusted to teach, guide and supervise students in their studies, and owe a duty of care to students. Professional staff interact and engage with students at the University for other purposes. Most staff members are in a position of power relative to students and must be mindful of this in their interactions with students.

Some staff members have a primary responsibility for the pastoral care of students, including staff working in University-owned or managed accommodation, in student counselling and in other student services. The University acknowledges that staff members who have a primary responsibility for the pastoral care of students are expected to comply with this procedure, within the operating context of their Position Descriptions.

All staff members are required to conduct themselves in a professional and appropriate manner in all interactions with students.

8.4. Friendships and relationships

Academic staff are encouraged to develop positive and professional working relationships with students to support students' educational outcomes and to achieve constructive interactions between students and the University. Most University students are adult learners. The University appreciates that friendships can develop between staff and students. In addition, staff and students can socialize with each other in University-related and other contexts, and pre-existing close personal relationships can exist prior to a student becoming enrolled or a person being employed at the University. Friendships and socializing are only acceptable on the condition that, the staff member at all times acts in an appropriate and professional manner towards the student and follows the expectations detailed in this procedure.

In the unusual circumstance that a staff member and a student develop a close personal relationship, the staff member must take great care to ensure that it was entered into fairly, as equals and with no misuse of the power involved in the staff/student relationship.

A close personal relationship that exists or develops between a staff member and a student must comply with all University policies and procedures (including the 'Conduct and Compliance Procedures – Conflict of Interest') and the University Ethics Statement. If there is a current supervisory or teaching relationship in place when a close personal relationship develops, the relationship must be declared under the Conduct and Compliance Procedures – Conflict of Interest so a management plan can be implemented.

Staff members must not enter into an inappropriate close personal relationship with students.

Where a staff member has a pre-existing close personal relationship with a person who later becomes a student of Ghana Christian University College, for example a staff member's child enrolls as a student, the pre-existing nature of the relationship would be taken into account in the determination of what conduct is professional and appropriate under this procedure.

While a staff member and a student have no contact in relation to study, research or employment at the University, social contact between staff members and students which arises outside of the University context is not covered by this procedure (such as through mutual friends, or as members of a sporting club). However this procedure will apply to such social contact immediately if the staff member and the student later come into contact in study, research or employment at the University.

In assessing the appropriateness of a close personal relationship between a staff member and a student relevant factors include:

- the social maturity of the student;
- the age difference between the two individuals;
- any potential vulnerability of the student;
- the student's personal circumstances at the time;
- whether there is a current supervision or teaching arrangement in place at the time;
- the circumstances/venue/lucidity of the student when the close personal relationship commenced or was initiated (for example, if the close personal relationship was pre-existing and entirely incidental to the staff/student status);
- the special family, kinship and elder relationships that exist within indigenous communities and between indigenous students and staff members;
- the nature of the two individuals' contact in study, research or employment at the University;
- the ability of the staff member to influence the academic progress, academic outcomes or career progression of the student; and
- the extent of the power imbalance between the two individuals.

It will often be difficult for a staff member involved in a close personal relationship with a student to make an objective assessment of its appropriateness and accordingly, they are encouraged to seek advice to ensure they have not involved themselves or the University in unlawful or inappropriate conduct. Involvement in an inappropriate relationship with a student will result in disciplinary action against the staff member up to, and including termination of employment.

8.5. What is professional and appropriate conduct?

Staff members must ensure that their interactions with students are always of a professional and appropriate nature.

Whether certain conduct is professional and appropriate in the circumstances is a question of subjective judgment taking into account all the relevant circumstances. By way of guidance, all staff members should:

- maintain an appropriate physical and emotional distance from students;
- use their Ghana Christian University College email accounts and telephone and internet access for work-related communications with students, avoiding unauthorised use of social media sites (such as Facebook or MySpace) and internet chat rooms;
- refrain from exchanging personal contact details including home addresses, private email addresses and private telephone numbers;
- refrain from divulging intimate personal information about themselves to students; and
- be mindful that the same guidelines and rules for appropriate conduct apply when staff and students are participating in fieldwork, conferences and other work-related activities away from the normal workplace.

As noted above, professional interactions are different between students and staff members whose primary professional responsibility is the pastoral care of students, such as residential services staff and counsellors.

By way of guidance, staff members who **do not** have a **primary** professional responsibility of the pastoral care of students should:

- where possible, ensure that meetings and discussions about work-related matters occur on campus;
- ensure that any one-on-one meeting about work-related matters that occurs off campus after hours occurs in a public venue, such as a library or a café, where practicable;

- refer students with support needs to a relevant University support service and limit the staff member's role in providing personal support to students as this is not part of their employment duties;
- refrain from contacting students after hours about work-related matters, where practicable ; and
- not seek intimate personal information from a student except as relevant to a University process (e.g. medical information for special consideration, or personal information as part of an academic progress process).

8.6. What sort of conduct will not be professional or appropriate?

Staff are obliged to avoid engaging in any conduct towards students that is unprofessional or inappropriate.

As noted above, whether certain conduct is professional and appropriate in the circumstances is a question of judgment taking into account all the relevant circumstances. By way of example of unprofessional and inappropriate conduct, staff members **should avoid where practicable**:

- one-on-one meetings after hours with students about work-related matters at private residences or secluded places;
- engaging in conduct of a sexual nature with a student whom they are teaching, assessing or supervising;
- having a close personal relationship with a student whom they are teaching, assessing or supervising;
- engaging in exploitative dealings with a student or using their position to their own personal advantage;
- discussing details of their own intimate and sensitive personal matters in one-on-one discussions with students, such as their sexual relationships, mental health or financial position;
- borrowing or accepting money or other gifts from a student or otherwise having a financial interest with a student, except for token gifts after all assessment is completed and in accordance with the Acceptance of Gifts, Benefits and Hospitality Procedure;
- behaviour of a threatening or criminal nature, or which makes the student feel unsafe, including stalking (repeated attempts to impose unwanted communication or contact, which elicit concern), sexual assault or bullying;
- any of the behaviour defined as "Sexual Harassment" under the Discrimination and Sexual Harassment Grievance Procedures; and
- engaging in any other conduct towards a student which is unreasonable, unwelcome and could reasonably be expected to make the student feel offended, humiliated or intimidated.

Many of the above examples of unprofessional and inappropriate conduct are likely to breach University policy and also to amount to misconduct or serious misconduct by the staff member, for which disciplinary action up to an including termination may be taken against the staff member.

A student who seeks guidance about whether certain conduct is professional and appropriate or who needs assistance in responding to unprofessional or inappropriate conduct should speak to the Dean, Equity and Diversity, Safer Community, student counselling or the student union/association.

A staff member who seeks guidance about whether certain conduct is professional and appropriate can contact his or her performance supervisor, the Head of the School, the Dean or the Divisional Director, Yeshua Tech HR, Equity and Diversity, or one of the Advisers listed in the Discrimination and Sexual Harassment Grievance Procedures.

8.7. Inappropriate conduct by students

Unprofessional or inappropriate conduct towards a staff member that is initiated by a student is not acceptable.

Unprofessional or inappropriate conduct by a student is likely to breach the ‘Discipline (Student) – Guidelines’, ‘Statute 4.1 – Discipline’ and other University policies and procedures. Grievance procedures apply, depending on the nature of the conduct.

A staff member who needs assistance in responding to unprofessional or inappropriate conduct that is initiated by a student should speak to his or her performance supervisor, the Head of the School, the Dean or the Divisional Director, Yeshua Tech HR, Equity and Diversity, or one of the Advisers listed in the Discrimination and Sexual Harassment Grievance Procedures.

8.8. Conflict of interest: Procedures

When a faculty-student consensual relationship exists or develops, a faculty position of authority with respect to the student must be avoided or terminated. Avoidance or termination includes but is not limited to the student not enrolling in a course; a qualified alternative faculty member or teaching assistant taking the position of authority; transfer of the student to another course, section, seminar, etc. taught by a different faculty member or teaching assistant; assigning or transferring the student to another academic advisor; the student dropping a course.

Staff must at all times comply with the ‘Conduct and Compliance Procedures – Conflict of Interest’. The ‘Conduct and Compliance Procedures – Conflict of Interest’ defines when a staff member will have a conflict of interest.

A conflict of interest will certainly exist if a staff member is involved in the admission, supervision, assessment or examination of students with whom he or she has, or has had, a close personal relationship.

It will usually be inappropriate and a breach of Yeshua Tech policy for the staff member to continue to teach, supervise or examine a student with whom the staff member has a close personal relationship.

Depending on the circumstances, a staff member may be able to continue to teach, supervise, assess or examine a student who is also a friend, however the staff member must comply with the ‘Conduct and Compliance Procedures – Conflict of Interest’. This will usually require the staff member to declare the friendship or close personal relationship, as the first step.

The obligation to declare a conflict of interest under the ‘Conduct and Compliance Procedures – Conflict of Interest’ commences **immediately** once the staff member becomes aware that he or she has a conflict of interest or a potential conflict of interest.

8.9. Reporting procedure

If a student or a staff member observes or experiences a staff member behaving in an unprofessional and inappropriate manner towards a student, they should report their concerns to the relevant supervisor, the Head of the School, the Dean or the Divisional Director. If the conduct is of a discriminatory or sexual nature, the person may consult one of the Advisers’ listed in the Discrimination and Sexual Harassment Grievance Procedures for advice.

The report can be provided in written form or verbal form and may be anonymous. The report should detail the concerning behaviour and staff member and student/s involved.

A supervisor, Head of the School, Dean or Discrimination and Sexual Harassment Adviser who receives a report should offer support to the student who is allegedly the subject of unprofessional and inappropriate conduct. The Dean or the Divisional Director should refer the student/s and staff member/s involved to the Employee Assistance Program (staff only) or the Health, Wellbeing and Development counselling service for additional support.

Reports of unprofessional or inappropriate conduct which appear to have been based on a reasonable belief by the person making the report should be discussed with the Dean or the Divisional Director. The Dean or the Divisional Director may obtain advice from the University Solicitor's Office, Yeshua Tech HR, Safer Community or Equity and Diversity, before deciding how to proceed.

The University may then take action in relation to the report, which can include (but is not limited to): informal counselling of the staff member;

- advice to and training of the staff member to assist the staff member to cease the unprofessional and inappropriate behaviour;
- a formal investigation of the matter by an officer of the University or their delegate, such as a staff member Safer Community Programs, Equity and Diversity, or Yeshua Tech HR;
- altering the supervision, assessment or examination arrangements in which the student and staff member are involved;
- formal declaration of a conflict of interest or other steps taken under the 'Conduct and Compliance Procedures – Conflict of Interest'; or
- disciplinary action in accordance with the applicable policies and procedures up to and including termination of employment.

The staff member's supervisor should ensure that any action – whether formal or informal – is recorded in the Performance Development Online (PDO) system either by making a confidential note using the Notes function or by uploading any relevant documentation to the staff member's performance portfolio.

Depending on the nature of the conduct being alleged, a report about unprofessional or inappropriate conduct by a staff member towards a student might, also be lodged under the 'Discrimination and Sexual Harassment Grievance Procedures', or in cases with broad impact beyond any one individual, the 'Conduct and Compliance Procedure – Whistleblowers'.

In considering and making a decision about a report under this procedure, the Yeshua Tech will apply natural justice and procedural fairness, and undertake a robust process for the determination of the accuracy and legitimacy of reports. Severe consequences will apply to persons knowingly making false allegations or false claims, up to and including disciplinary action.

Staff and students who have reported concerns about conduct, which is potentially of a criminal nature, should be aware that Ghana Christian University College may involve the police or recommend a report to police. If police become involved in the matter, Ghana Christian University College's ability to take action in relation to the report may be limited by the obligation to not jeopardise a criminal investigation and/or prosecution.

8.10. Privacy and confidentiality

Students or staff should not let concerns about privacy or defamation stop them from reporting genuine concerns to a person with authority to receive such a report under these procedures.

Ghana Christian University College is required to comply with State privacy legislation in relation to an individual's personal or health information, and has developed a [privacy policy](#) outlining how Yeshua Tech handles personal and health information. The University's response to a report of unprofessional or inappropriate behaviour will be consistent with the privacy laws.

8.11. Failure to comply with staff-student relationships procedure

Any credible allegation of a faculty member's failure to avoid or terminate a position of authority while in a consensual faculty-student relationship, obligates the department head, dean, or other responsible person to conduct a prompt and thorough inquiry to determine whether the allegation is true. Where it is concluded that a position of authority in a faculty-student consensual relationship exists and the faculty member and/or the

student involved refuse(s) to terminate the position of authority, the department head or dean shall terminate the position of authority and can impose sanctions against the parties involved.

Failure to comply with this procedure or the directions of the Head of Department, Dean or Director may result in disciplinary action in accordance with the provisions of the relevant enterprise agreement and contract of employment, including possible dismissal in cases of serious conflict of interest or other serious misconduct.

8.12. Responsibility

All University staff including adjunct staff and including honorary appointees of the University and staff of Yeshua Tech controlled entities must be aware of, read, understand and comply with this procedure.

Heads of Departments and Directors should:

- be aware of this procedure and make staff and students aware of the procedure;
- promote and support a study and work environment that is safe and free from unprofessional or inappropriate conduct towards students;
- be aware of any actual or potential breaches of this procedure by staff within their area of responsibility, assess risks and advise the Dean or Divisional Director;
- assist staff and students who have queries about staff / student relationships or staff conduct towards students;
- support staff of their unit to manage any conduct towards students or staff / student relationships that are potentially unprofessional or inappropriate; and
- seek advice or support from the Dean or Divisional Director where necessary.

Deans and Divisional Directors should:

- be aware of this procedure and ensure Heads of Department and Directors are aware of this procedure;
- be aware of risks in relation to staff / student relationships and staff conduct towards students within their area of responsibility, and manage those risks appropriately;
- provide advice to their staff and students on the management of staff / student relationships and staff conduct towards students;
- manage and respond to any reports of unprofessional or inappropriate conduct by staff towards students or other breach of this procedure; and
- seek advice or support from the relevant office within the University where necessary, such as the University Solicitor's Office, Yeshua Tech HR, Safer Community or Equity and Diversity.

8.13 Sanctions

Persons in violation of this policy shall be subject to sanctions ranging from verbal warnings to dismissal or termination. Persons who knowingly make false allegations that a faculty-student consensual relationship overlaps with a position of authority between the two shall be subject to the same sanctions.

IX

Code of Confidentiality

9.1 All staff of the University must adhere to the principles of confidentiality as outlined in the University's Privacy Policy and have a duty to maintain the confidentiality and security of any personal information for which they are responsible, including computerised data.

9.2 Staff members who have access to official University documentation and information must take care to maintain the integrity, confidentiality and privacy of such information to protect any individual concerned. Members of the University should also undertake to maintain the privacy of oral communications where that has been requested.

9.3 Staff must take care to respect the confidentiality and privacy of students and only provide information when authorised by the Vice-President (Finance & Administration's Office) or for legitimate academic purposes.

9.4 Within the University, no staff member shall have access to information about any individual, without that individual's consent unless a responsible officer of the University is satisfied that the staff member is acting in the course of his or her duties and that the information is relevant for the purpose for which it is being sought.

9.5 In general, all personal data of a sensitive nature information given orally to a member of staff by a student should be treated as confidential and should only be disclosed with the student's consent. Sensitive data for the purposes of this Code is information given in confidence concerning, for example, a student's domestic or economic circumstances, ill-health or disabilities, including mental health difficulties. It does not include personal data which fellow University employees would require in order to carry out their normal duties.

9.6 Personal information about staff or students will generally not be released to a third party unless the subject is informed of the reason for its collection and provides a full written approval other than in special circumstances where the disclosure may prevent a serious and imminent threat to the life or health of the individual concerned or of another person. However, the University is legally obliged to respond to any request for information in the form of a police warrant, subpoena, summons or other court order.

9.7 The University's responsibilities under the Data Protection legislation are set out in the Guidelines for the Handling of Student Personal Data. Student personal data includes practically any information about, or correspondence relating to a named student. Anyone working for the University whose duties include the handling of students' personal data are required to observe these guidelines. The guidance applies to all media in which information is kept, on paper, computer, microfilm or in any other way. Whilst the guidelines do not directly address the status of *oral* information, the general

provisions of the Act would still apply and certainly any written notes arising from discussion are subject to the provisions of the Data Protection Act.

9.8. In all cases where, in the member of staff's judgement, it would be in the student's interests for such sensitive personal information to be disclosed (e.g. so that appropriate support may be provided) the student's consent should be obtained. Oral consent will often be adequate, but in certain cases it may be advisable to obtain consent in writing.

9.9. If the student chooses not to provide their consent this decision should be respected, although the implications in terms of levels of support that can be put in place should be made clear. There are occasional circumstances, however, where the student's consent is withheld – or it is impracticable to try to obtain it – when the commitment to confidentiality should be broken. These are:

- When the student's health or safety is at risk
- When the student is at risk of serious abuse or exploitation
- When the student's behaviour is adversely affecting the rights and safety of others, especially University staff and students
- When the student is infringing University regulations or disclosure is required by law
- When the student's current or predicted behaviour, or health needs, compromise the University's responsibilities to outside agencies, including practice placements, and partner institutions.
- Where there are serious grounds for concern about the student's mental well-being.

9.10 Guidance notes

It is clearly important to ensure that personal information is handled sensitively and that confidential information is shared only with certain designated University officers in the first instance. If you need to break the commitment to confidentiality you can discuss a named student, or, in discussion, the student can remain anonymous until you have established whether there are grounds for breaking confidentiality.

In general, where you have concerns about a student's mental well-being, you should either refer the student to the Student Advisor or contact the Mental Health Co-ordinator directly.

X

Representing GhanaCU: Public Utterances

10.1 Preamble

The purpose of this procedure is to give guidance to staff in relation to making public statements in relation to official University policy, and communication between the University and ministers of the crown.

10.2 Defining Public Comment

Public comment includes public speaking engagements, comments on radio, television or online and expressing views in letters to newspapers or in books, journals or notices or where it might be expected that the publication or circulation of the comment may spread to the community at large.

10.3 Communication with ministers of state

There are various situations in which it is appropriate for members of the University to communicate with ministers of state, and occasions when it is their duty to do so.

There are also occasions when it is proper for an University official, such as the president a dean, or a vice president, to convey to a minister the views of the University or of a faculty.

It is, however, a matter of fine judgment to determine who should communicate with a minister on a particular issue, and it is hoped to rely on the good sense of staff in these matters rather than to lay down detailed rules.

10.4 Public statements by members of staff and students

Any statement which purports to be the view of the University should not be conveyed to a minister other than through the president, or with the president's prior agreement.

It is always wise to consult the President beforehand as he or she may be in possession of relevant information and may, for example, know what other similar or contradictory approaches have been made. The President should, in all cases be sent a copy of such communications for information.

All members of the University have the right to express their views on any matter of public interest. They need to exercise this right with due regard to the interests of the University.

Members of staff are urged to exercise particular care when making public statements in relation to official University policy. When a member of staff makes a public statement within the range of her/his own expertise it is proper, and may be essential, that the University address and appointment be given. There may be cases where it is important that a staff member makes it clear that a personal view is being expressed and a private address is given.

Staff members are encouraged to comment publicly. When staff members are representing the University the highest ethical and professional standards are expected of them primarily due to the sensitivity of some issues within the community.

Members of the University in their capacity as private citizens have a right to make public comments. If staff members are publicly commenting on issues not within their professional expertise, the member must make it clear that the comment is being made in a private capacity and not necessarily that of the University.

There is no intention of limiting individual freedom and the University relies on the good sense of the staff in these matters.

10.5 Responsibility

Views which are attributed to the University as a corporate body can only be made public by officers of the University duly designated by Council to act on behalf of the University or by staff members designated by Council, or their delegate, to represent the University's position on specific issues.

All University staff including honorary staff appointed by the University and staff of Yeshua Tech controlled entities **should** be aware of, read, understand and comply with this procedure.

XI

Reporting Conduct and Complaints

Reporting Corrupt Conduct, Maladministration and Serious and Substantial Waste of Public Resources

Employees are urged to report suspicions of a corrupt conduct, maladministration and serious and substantial waste of University resources.

When an employee of the University suspects corrupt conduct, the employee may report the allegation in confidence to the Vice-President (Finance and Administration), who is the University's disclosure coordinator. The employee may also discuss the allegation with his/her supervisor. Any such allegations will be treated in strict confidence and investigated appropriately.

If an employee does not consider it appropriate to disclose an allegation of suspected corrupt conduct to his/her supervisor, disclosure should be made directly to the President.

The University's Approach to Complaints

The University treats all complaints seriously and makes every effort to investigate them expeditiously. Staff should make every effort to direct their complaints through the proper channels.

The University applies the principles of natural justice in investigating complaints. The University acknowledges that there are multiple ways of dealing with complaints. It is useful, prior to making a complaint, to consult with appropriate persons to identify the best way to proceed. These could include the Vice Presidents and the Dean of Societies and Students Development. Employees are encouraged to consider all potential complaints carefully and should refrain from making frivolous, malicious or vexatious complaints.

XII

Sexual Misconduct Policy

Ghana Christian University College defines sexual misconduct as sexual intercourse (anal, oral, or vaginal) or sexual touching (including disrobing or exposure), however slight, with any object, by a man or woman upon a man or a woman, without effective consent.

Effective consent is informed, freely and actively given, mutually understandable words or actions which indicate a willingness to participate in mutually agreed upon sexual activity. Consent is not effective if it results from the use of force, threats, intimidation, or coercion.

In addition, to have sex with someone who you know to be, or should know to be incapable of making a rational, reasonable decision about a sexual situation is a violation of this policy (e.g. an intoxicated person or someone with a mental or emotional impairment).

The prior sexual histories of any party in a sexual misconduct complaint are inadmissible in University judicial proceedings. The only exception to this rule will be when a party can demonstrate the relevance of past sexual relations between the parties and the issue of consent and/or when the accused wishes to demonstrate physical evidence in the complaint which can be attributed to another party. The University Review Board retains the right to consider these exceptions and their admissibility in closed session.

XIII

Harassment Policy – University Anti-Harassment Policy

1. Harassment of students or employees at Ghana Christian University College on the basis of race, color, national origin, ancestry, religion, creed, gender*, sexual orientation, age, or physical or mental disability is unacceptable and will not be tolerated. Such conduct is inconsistent with the University’s commitments to excellence and to respect for all individuals. This policy is intended to complement the University’s Equal Opportunity and Affirmative Action Policy. **NOTE: Students accused of violating the University’s Anti-harassment policy may, depending on the seriousness of the allegation, be referred to the University Review Board for adjudication and consideration of possible suspension or expulsion.**

2. The University is also committed to protecting the academic freedom and freedom of expression of all members of the University community. This policy will be construed and applied in a manner that protects the Academic freedom and freedom of expression of all parties to a complaint. Academic freedom and freedom of expression include but are not limited to the expression of ideas, philosophies, or religious beliefs, however controversial, in classroom or other academic settings.

3. The term “harassment,” as used in Paragraph 1 of the policy refers to verbal, physical, graphic, or written conduct that has the purpose or effect of creating a hostile or intimidating environment; i.e., conduct which is sufficiently severe, pervasive, or persistent that it interferes significantly with an individual’s employment, education, or living conditions. The conduct alleged to constitute harassment under this policy will be evaluated from the perspective of a reasonable person similarly situated to the complainant and considering all of the facts and circumstances. Harassment must be distinguished from behavior which, even though unpleasant or disconcerting, is appropriate to the carrying out of instructional, advisory, or supervisory responsibilities. Instructional responsibilities in particular, require appropriate latitude for pedagogical decisions concerning the topics discussed and methods used to draw students into discussion and full participation.

4. Members of the University community and others who believe they have been harassed in violations of the policy by University employees or students, or by contractors or vendors serving the University, may contact the Office of University Compliance. Formal complaints must be filed in the Office of University Compliance within 45 calendar days following the occurrence of the act, incident, conduct, or pattern of conduct constituting the alleged violation. Such complaints will be processed under the “Ghana Christian University College Equal Opportunity and Affirmative Action Complaint Investigation Procedure and Appeal Process.” A copy of this document may be obtained by contacting the Office of University Compliance. Complaints involving students may instead be filed in the Office of Student Rights and Community Standards for handling under the procedures set forth in the Student Code.

5. Any University employee who becomes aware of conduct by another University employee, student, vendor, or contractor which the employee reasonably believes constitutes harassment

under this Policy shall report the conduct immediately to the Office of University Compliance; or, if the harassment involves students, the conduct may instead be reported to the Office of Student Rights and Community Standards. To knowingly file a false or malicious complaint or report of harassment is a violation of the policy.

*This policy covers gender-based harassment that is non-sexual in nature. Sexual Harassment is covered by a separate “Statement on Sexual Harassment.”

XIV

Whistle-blowing Policy

1. Introduction

The Whistleblowing Policy and Procedure aims to offer guidance to facilitate and support staff and students to safely raise complaints/concerns related to practice placements directly with appropriate individuals, who will then act on their behalf, to communicate the complaint/concern to key personnel.

An important aspect of the process is assuring and maintaining confidentiality which will be guaranteed at all times, however, due to the nature of some situations there are occasions where anonymity cannot be guaranteed.

Whistleblowing is relevant to all organisations and the people who work or study in them. All staff and students have a role in highlighting or communicating issues or concerns that present risks to an organisation, its staff, service users or students on placement within the host organisation. All placement providers are at risk of things going wrong. When a risk occurs, often one of the first people to suspect or realise that something is wrong may be a student. However, the student may not feel they are the best person or in the best position to whistle blow, or they may lack confidence in raising the issue. It is the aim of this policy and procedure to enable and support staff/students in identifying and taking appropriate action should such situations arise.

2. Policy Statement

This policy and procedure applies to the whole University . The aim is to ensure that potential/identified risks are managed in a timely manner in order to minimise the risk and/or limit the potential for future risk.

As a public body, the University recognises that staff and students are permitted to speak freely without fear of disciplinary action, victimisation or discrimination. This extends to providing processes that facilitate and support staff and or students to raise legitimate concerns/issues.

No detrimental action of any kind will be taken against an individual making a complaint/raising an issue, provided that it is done in good faith and without malice. A malicious or vexatious complaint, however, could result in disciplinary action.

3. Definitions of Whistleblowing

In the context of this policy and procedure, Whistleblowing is defined as '*raising complaints or concerns about malpractice or wrongdoing in the workplace without fear or reprisal*'. The procedure is intended to cover concerns which are in the public interest and may involve any of the following (though this list is not exhaustive):

- Abuse of service users – patients, clients, pupils or their carers / legal guardians
- Theft, fraud, corruption
- Endangering health or safety or the environment
- Administrative malpractice (financial or non-financial)
- Other improper, unprofessional conduct or unethical behaviour

- Suppression or concealment of any information relating to any of the above

These concerns may be about something that: -

- Makes you feel uncomfortable in terms of known standards, your experience or the University statutes and policies for both employers and employees; or
- Falls below established standards of practice

This is not intended to be a comprehensive list and any other matters raised under this policy will be considered seriously.

For the purpose of this policy risk is defined as *“any situation that the student is involved in which gives rise for concern for any of the parties involved”*.

The management of risk also aims to:

- Provide a rapid support system to students who have experienced an adverse event
- Reduce possible harm to client groups
- Reduce possible harm to the organisation
- Improve the learning environment
- Reduce possibility of harm to the student/employee

4. Procedure for managing a concern/complaint raised by a student or a member of University staff

4.1 Informal Procedure

Some situations which are of a minor concern can usually be dealt with either by direct challenging of the person concerned or by discussion with the student’s Head of Department. If the issue is resolved at this stage, no further action is required, but even in such a case the individual should be satisfied that the issue has been properly addressed. This would mean that the person taking the report would have to record the substance of the concern and action/s taken to deal with the situation. Students should in all cases seek advice and guidance from their Head of Department (HOD) or from the Office of the Dean of Societies and Student Affairs and ensure that their Personal Student Advisor or their Society Warden is aware of the outcome of the informal procedure.

- 4.2** If the issue is resolved at this stage, **no further action is required**. If the person raising the issue is not satisfied with the outcome of this procedure then the concerns should be put in writing in accordance with the formal procedure.

4.3 Formal Procedure

This procedure is intended to be used for any matter not satisfactorily dealt with by the informal procedure and for those serious matters outlined in the scope of this policy

Students should always take advice from their HOD, when they feel that formal procedures need to be invoked. A University member of staff raising concerns should take advice from their line manager.

- 4.4** The formal procedure is instigated by the completion of a written report using **FORM 1 Whistleblowing Report** (see Appendix 1).

- 4.5** The report should be given, in the first instance, to the HOD. The person/s making the report must retain a copy. A copy of this report will also be sent to the Dean of Societies and students Affairs.

- 4.6 The University will respond to the concerns raised and it will be necessary to investigate these concerns, but this is not the same as accepting or rejecting them.
- 4.7 Within 5 working days of a concern being raised the University will send a written response:
- acknowledging that the concern has been raised
 - indicating how the University propose to deal with this matter
 - giving an estimate of how long it will take to provide a final response
 - indicating whether you whether any enquiries have been made
 - providing information on relevant support mechanisms

The Deans of the student's School and the Director (in the case of a student) or the Director of Human Resource (in the case of Staff) will be sent a copy of this response.

- 4.8 Where appropriate, matters raised may:
- be investigated by management
 - be referred to the police or other statutory agencies
- 4.9 In order to protect individuals and those about whom concerns are raised, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- 4.10 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.
- 4.11 The amount of contact between the individual considering the issues and the person raising the concern will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the investigating officers will seek further information from the person raising the concern.
- 4.12 There may be the necessity for a meeting between the person reporting the concern and the University Chaplain. If this is the case a colleague of choice can accompany the student/member of staff to that meeting. The Personal Student Advisor or Line Manager will also be able to offer support as appropriate.
- 4.13 Should an **outsider (one not a member of the University community)** wish to interview the person raising concerns, permission **MUST** be sought from the Director of Societies and Student Affairs as per the '*Request to Interview a Student of Ghana Christian University College*' Policy/Procedure (See Appendix 2) and complete **FORM 2 REQUEST TO INTERVIEW A STUDENT** (See Appendix 3). A formal response will be issued to all requests within 2 working days.
- 4.14 The University accepts that we may not be notified until after the event has taken place (e.g. there may be occasion where a student needs to be interviewed immediately by a Police representative), however, should the Outsider need to take immediate action following a serious incident, then Ghana Christian University College expect to be notified of this at the first available opportunity and no later than the next University working day.
- 4.15 The University will take steps to minimise any difficulties that students or staff may experience as a result of raising a concern. If for instance you are required to give evidence

in criminal or disciplinary proceedings, the University will arrange for you to receive advice about the procedure.

- 4.16** The University accepts that anyone raising concerns needs to be assured that the matter has been properly addressed. The Head of Department will monitor the progress of the concern and subject to legal constraints, will inform the person raising the concern of the outcome.
- 4.17** The Dean of Societies and Students Affairs will maintain the confidential records and monitor all risk incidents and report any trends/findings to the Provost/Vice President.

5. Procedure for concern/complaint raised by a member of staff

There may be occasions when a member of staff wishes to raise concerns regarding a student of Ghana Christian University College.

- 5.1** If a member of the staff has a concern about the behaviour or conduct of a student that complaining staff must communicate this to the Students Personal Advisor or the Student's HOD (if the Advisor is not available). If the situation is resolved at this stage **no further action is required.**
- 5.2** If the situation is not resolved at this stage, the University will initiate an investigation and will work together with the agency to determine an appropriate course of action. The HOD will provide advice and guidance in line with the University Regulations and the Student Code of Conduct and where required will convene a Conflict Resolution Panel.
- 5.5** The University will maintain confidential records and monitor all risk incidents and report any trends/findings to the appropriate officer. These will be reviewed annually with the Dean of Societies and **Student Affairs.**

XV

Equal Opportunities and Diversity Policy

1. Introduction

The University recognises that equality of opportunity and valuing diversity are vital to its success. We believe that our purpose, aims and values, as set out in our University Strategy, will be best achieved if we recruit students and staff at all levels of responsibility from the national, regional and international communities that we serve and which influence our University.

GhanaCU is fully committed to elimination of discrimination. Through promoting an environment in which individuals can utilise their skills and talents to the full without fear of prejudice and harassment we aim to make full use of the talents and resources of everyone within our University community.

2. Scope

This policy applies to all colleagues who work at the University on a paid or voluntary basis, all students, external examiners, consultants, all visitors or contractors who visit our premises.

It covers equality and diversity in relation to:

- Age
- Disability
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion and/or Belief
- Sex

3. Aim

The University aims to demonstrate its commitment to equality and diversity and promote equality of opportunity for all by:

- Developing and publishing diversity objectives
- Complying with legal obligations
- Mainstreaming equality and diversity in to the University's planning round for all departments and colleges
- Promoting awareness and understanding of equality and diversity matters among staff and students
- Involving staff and students in respect of changes which may affect their employment or study
- Encouraging suppliers and partners to follow similar good practice
- Promotion of equality and diversity through internal and external communications
- Ensuring that existing staff and students, as well as applicants to work or study, are treated fairly and judged solely on merit and by reference to their skills and abilities
- Ensuring the University estate is, as far as reasonably possible, accessible to all

- Providing training and briefings for staff at all levels

- Developing mechanisms for implementation, monitoring, evaluation and review of equality related policies
- Taking positive action to redress any gender, racial or other imbalance
- Ensuring staff and students are provided with appropriate mechanisms to discuss equality and diversity issues and raise any concerns
- Dealing with potential acts of discrimination appropriately under relevant University policy
- Consulting with staff, students union etc. through existing mechanisms on equality and diversity issues

4. Responsibilities

- **University Council** through the **President** has ultimate responsibility for ensuring that University Equality and Diversity Policy is fully implemented. The **Dean of Societies and Students Affairs** is responsible to the **Vice President/Provost** for leading the implementation of the University's strategy in relation to equality and diversity for both staff and students.
- The **Director of Human Resources**, has a specific and delegated responsibility for the effective development and implementation of equal opportunities in employment. The **Director of Academic Affairs**, has a specific and delegated responsibility for the effective development and implementation of equal opportunities for the student body. The **Ghaphlain** is responsible for the co-ordination of the Equality and Diversity work.
- The **Director of Human Resources** has responsibility for the formulation of policies and procedures in relation to staff to support the University's overall strategy and for overseeing their implementation. The **Academic Affairs Director** has responsibility for the formulation of policies and procedures in relation to students to support the University's overall strategy and for overseeing their implementation. The University's **Equality and Diversity Advisory Group** is responsible for co-ordinating and reviewing the University's Equality and Diversity Policy in addition to promoting greater awareness of equal opportunities and diversity within the University in its broadest sense. Equality and Diversity.
- **Heads of Departments, Wardens of Societies, other Heads of Sections and Chairs of Appointing Committees** have a duty to ensure that the University's equal opportunities policies in respect of employment are implemented within their sphere of activities and responsibility, and to nominate a staff member to have local responsibility for co-ordinating Equality and Diversity work.
- **Education Committee** has a duty to ensure that the University's equal opportunities policies in relation to student matters are implemented.
- **All members of staff** have a responsibility to adhere to this policy at all times in the course of their day to day activities. Staff have a personal responsibility to attend designated training sessions to keep abreast of equality legislation. Behaviour or actions contrary to this policy will be considered serious disciplinary matters and may, in some cases, lead to dismissal.
- **All members of the University community**, external examiners, consultants, contractors and visitors to our premises have a responsibility to adhere to this policy at all times in the course of their day to day activities,

5. Implementation of the Equality and Diversity Policy

We will ensure that all staff, students and as far as practicable, others associated with the University are informed of the policies and their responsibilities with respect to implementation. The means of doing so include:

- Nomination of a person by each department/section/college who will be responsible for promotion of Equality and Diversity.
- The production and distribution of information to all members of the University to raise awareness of specific equality legislation issues.
- A designated website for Equality and Diversity.
- Equality and Diversity awareness training to all employees via a cascade of information within every department and section. The training programme to be monitored to evaluate its effectiveness.

- Appropriate training provided for those persons responsible for the implementation of the policy, including University Council members.
- Specific training provided for those responsible for recruitment, selection, promotion, probation, appraisal. A list of approved selection interviewers for staff and students developed.

6. Training

All staff are required to attend equality and diversity training appropriate to their role. Information on training will be made available on the Equality and Diversity area of the website.

We aim to assess the impact of our Equality and Diversity Policy by monitoring as follows:

- The **Human Resources Department** will collect and analyse monitoring data on staff with regard to recruitment, training, promotion and re-grading, complaints etc. and report this information annually to the Equality and Diversity Advisory Group
- The **Academic Office** will collect and analyse monitoring data with regard to recruitment and completion and report this information annually to the Equality and Diversity Advisory Group and Learning and Teaching Committee.

7. Complaints Procedures related to Equality and Equality and Diversity

All members of our University community who believe they have been discriminated against have the right to make a complaint. Normally the matter should first be raised informally in the first instance with their immediate supervisor, College Principal, Chair of Board of Studies or Head of Section using the following procedure, as appropriate:

- Respect at Work Policy
- Respect at Study Policy
- University Statutes (for academic staff)
- Grievance Procedures (for non-academic staff)
- Student Academic Appeals Procedure
- Student Complaints Procedure

Any member of staff may seek assistance from the Human Resources office and students may seek advice from GhanaCU Students Union (GSU).

If the complaint is not resolved individuals should make a formal complaint following the appropriate procedure.

Making a complaint does not prejudice an individual's right to make use of other procedures, including the Respect at work and study or Grievance procedures.

We aim to protect anyone who makes a complaint, or who acts as a witness, under these procedures from victimisation.

Members of the public should address complaints to the University service in question in the first instance.

8. Consultation and Review

The university will consult widely with the University's Equality and Diversity Advisory Group, Diversity Network, Staff Association, GhanaCU Students Union and other stakeholders on a regular basis. It must be borne in mind and soul that the university is strictly Christian in its religious orientation and refers to the Bible for direction.

The University's policy on Equality and Equality and Diversity, will be reviewed on a regular basis to ensure that it continues to reflect good practice and current legislation.

XVI

Statement of University Health and Safety Policy

1. Scope

This policy applies to all employees, students, premises and activities under the control of the University, including staff and students travelling off and between campuses in the UK or overseas on University business. If the policy is implemented effectively, not only will the risk of injury and damage be reduced, but also our students will carry forward a positive attitude to health and safety in their working lives.

2. Aims

Council, as the governing body of the University, recognises and is committed to its legal duty and responsibilities for the health and safety of employees, students and others affected by its operations. The Ghana Christian University College recognises its legal duty for providing a safe and healthy workplace and suitable working environment for its staff, students and others (contractors, visitors and the public) who could be affected by its work or undertakings.

Council delegates operational responsibility and authority for the implementation of health and safety policy to the President as Chief Executive Officer of the University. The President is responsible for the provision and maintenance of a framework that will provide and maintain safe and healthy working conditions for all those for whom the University is responsible. To this end, the President will ensure that there is a management organisation competent to fulfil the requirements of this policy and will also ensure that:-

- there is strong and effective health and safety leadership to the University
- adequate resources are made available for assuring health and safety
- decisions made reflect the intentions of the Policy
- active participation in improvement of health and safety is encouraged and recognised
- there are effective routes for consultation with staff and students on health and safety matters
- health and safety performance is continually reviewed and assessed at least annually.

Health and safety is a key line management responsibility and the University is committed to ensuring that it is an integral part of the core management activity of the University. The Executive Group will lead by example in communicating and promoting this policy and the aim will be to strive for continuous improvement in health and safety performance. The University requires all managers to demonstrate positive leadership in the promotion and management of health and safety. All staff are required to co-operate with management arrangements to address these responsibilities, including attendance at health and safety training.

In support of this policy, a strategic plan will be developed by the University with specific objectives and will set targets with the aim of:

- reducing accidents and cases of work-related ill-health,
- improving the health of the workforce,
- complying, as a minimum, with all relevant health, safety and environmental legislation and best practice,
- developing a positive health and safety culture throughout the University.

The plan will form part of the overall strategic planning of the University.

Sufficient resources will be made available to support implementation of this policy and the strategy.

3. Key Objectives

In order to achieve these aims the University is committed to implementing the following in order to achieve the key objectives for which the management organisation will be held accountable:

- a proportionate and common sense approach will be adopted to maintain respect and compliance
- the integration of health and safety planning into the University's core activities
- the provision of support for the development of a positive health and safety culture throughout the University
- defining health and safety responsibilities of staff
- ensuring that staff understand and are competent to discharge their individual responsibilities through the provision of sufficient information, instruction, training
- holding staff accountable for meeting their individual responsibilities through a system of supervision, monitoring and review
- securing the competence of staff and their supervisors
- ensuring that competent specialist advice on health and safety is available to the University
- maintaining an effective and properly resourced health and safety management system
- ensuring that those staff who have direct responsibility for students actively encourage them to exercise a duty of care for their own safety and that of others around them
- encouraging students to become risk aware
- actively involving staff, including especially safety representatives, in health and safety
- ensuring effective communication and consultation with staff, students and others affected by University activities
- co-ordinating and co-operating with other employers where:
 - University employees or students share premises and/or facilities and undertake activities with persons working in other organisations
 - Persons from other organisations, including contractors, are working in University-controlled activities
- measuring and reviewing health and safety performance regularly at both University and school/department levels with the aim of continuous improvement.

4. Some Violations That Compromise the Health/Safety/Welfare of Others

i. Alcohol -Using, possessing or distributing alcoholic beverages except as expressly permitted by law and University policies.

ii. Arson - Attempting to set fires, or acting in a manner that disregards fire safety rules and results in a fire.

iii. Drugs - Using, abusing, possessing, selling, distributing, manufacturing, or transferring narcotics, illegal drugs as defined by federal, state, or local laws, or any controller substance, (including marijuana, inhalants, and abuse of over-the-counter drugs and prescription drugs), except as expressly permitted by law. Possession of drug paraphernalia which can be demonstrated to be linked to illegal drug activity is also a violation of this policy.

•

iv. False Reporting - Falsely reporting an emergency.

v. Gambling - Engaging in gambling, wagering or other games of chance in violation of the law

- **vi. Smoking** - Smoking in areas on campus other than those designated for smoking.
- **vii. Tampering with Fire Equipment** - Unauthorized use, activation or alteration of firefighting equipment, fire safety or other emergency equipment.
- **viii. Weapons** - Transferring, using, possessing or manufacturing explosives, fireworks, firearms, dangerous chemicals, or any other weapons (deemed capable of causing bodily injury or property damage), on University property

5. Organisation for Implementation of the Policy

A member of the Executive Group shall be designated with particular responsibility for ensuring that the health and safety management system is properly implemented and performing to requirements in all locations and spheres of operation within the University.

The University will define specific health and safety responsibilities of managers and staff in areas of policy making, executive line management and specialist competent advice. Organisational arrangements are detailed in the University document entitled University Health and Safety Policy.

6. Arrangements for Implementation of the Policy

Heads of School/Department are responsible for the management of health and safety in their school/department and are therefore also responsible for implementing this policy in school/departmental health and safety management arrangements. These arrangements will be based on identification of hazards and the control of risk.

The University Safety, Health and Environment Unit will develop performance standards for approval by the Safety, Health and Environment Executive Committee, which will assist schools/departments in implementing various elements of their health and safety management systems. The arrangements in place are detailed in the University document entitled University Health and Safety Policy.

Arrangements will be monitored and audited regularly.

7. Review

The University is committed to reviewing and developing its policy, organisation and arrangements for implementation to ensure that it remains both current and relevant. To achieve this it will document a review process that will be undertaken annually, with additional reviews initiated if a major change to premises or activities were to occur. **No** alterations to the Health and Safety Policy, Organisation or Arrangements will be made without formal consultation through both the Safety, Health and Environment Executive Committee and the Health, Safety and Environment Consultative Committee. Final agreement must be sought by Council.

Council and the President require all University managers and employees to read this policy and give effect to the commitments contained within it.

Appendix I

WHISTLEBLOWER REPORT FORM

INSTRUCTIONS: GhanaCU accepts and investigates allegations of improper governmental activities by GhanaCU employees or where GhanaCU is potentially a victim of wrongdoing.

GhanaCU Policy on *Reporting and Investigating Allegations of Improper Activities* is located at http://www.ghanacu.net/University_policies/whistleblower. Reports may be made anonymously or with identification by using an on line form at the website www.ghanacu.net/hotline.

Because we do not undertake investigations without adequate cause, we need as much evidence as possible to corroborate the allegation(s) such as documents, witnesses, and other specific and relevant information.

Investigating improper governmental activities is more difficult if complaints are filed anonymously because of the difficulty of obtaining evidence to corroborate the alleged improper activity before we begin an investigation. If you choose to file your complaint anonymously, be sure to provide specific and relevant information including the first and last names of any individuals mentioned, their contact information, and the location address at which the improper activity occurred.

When describing the improper activity, please provide as much of the following information for *each* of your allegations and number each allegation, if there is more than one. Use additional pages if necessary.

Who? Who is involved? If outside businesses or contractors are involved, what are the names of the businesses, who owns them, and where are they located? Who else knows about the improper activities? Who can and would confirm that they occurred? How can we reach these witnesses?

What? What specifically did the suspect do? What is wrong with it? Are there laws or regulations that govern what the suspect did? What kinds of documents would provide evidence of the improper activities? Where are the documents located? Who controls them?

Where? Which division, unit, or campus location did the action happen?

When? When did the improper activity occur? Is it ongoing? How frequently has it occurred?

Why? What are the suspect(s) motives? For example, how does the suspect benefit? If others benefit from the activities, who are they and how do they benefit?

How? How did the wrongdoing occur? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

Please enclose completed form in an envelope marked “Confidential” and mail to:

Office of the Dean
Societies and Student Affairs Directorate
Ghana Christian University College, P. O. Box AF Adenta, Ghana

REPORTER'S CONTACT INFORMATION (Not Required)

NAME		POSITION
EMPLOYER/UNIT	WORK LOCATION/ADDRESS	WORK PHONE
HOME ADDRESS		HOME PHONE
BEST TIME/PLACE TO REACH YOU:		

SUSPECT(S) INFORMATION

1. NAME		POSITION
DIVISION	UNIT	UNIT ADDRESS
		WORK PHONE
HOME ADDRESS/HOME PHONE (IF NON-EMPLOYEE)		

WITNESS(ES) Please provide witnesses that can confirm your allegation

NAME	TITLE	WORK PHONE
DEPARTMENT	ALLEGATION NUMBER(S)	HOME PHONE
NAME	TITLE	WORK PHONE
DEPARTMENT	ALLEGATION NUMBER(S)	HOME PHONE

COMPLAINT: Briefly describe the improper activity and how you know about it. *Specify what, who, when, where, and how.* If there is more than one allegation, number each allegation, use as many pages as necessary.

- What wrongdoing occurred?
- Who did the wrongdoing?
- When did this occur?
- Where did this happen (Unit, location)?
- What enabled this to happen (How)?

EVIDENCE Please describe how a GhanaCU investigator could locate supporting documentation or attach a copy of evidence that you have already in your possession. You should NOT ATTEMPT TO OBTAIN evidence for which you do not have a right of access, as such, whistleblowers are “reporting parties” not investigators.

Responsibility for Policy: Vice President

Approving Authority: President

Approved: April 2017