



Code of Ethics for Employees and Persons on a Contract for Service

Version 1.5

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1. Preamble

1.1 This Code of Ethics is founded upon the IfE's Mission which states:

'The Institute for Education promotes high quality education for educators and learners at all levels, and by collaborating with stakeholders, it fosters learning communities of the highest standard while instilling education with equity and social justice'.

1.2 In pursuing this mission, employees, and persons on a contract for service of the Institute for Education (IfE) are guided by a shared commitment to behaviour and practices that conform to the highest ethical standards. The IfE has developed this Code of Ethics to record the ways in which individuals at the IfE, through their personal relationships, activities and conduct, create and sustain a community that exemplifies the IfE's values.

2. Introduction

2.1 The IfE, as an educational institution and learning community, is based upon certain core values, including responsible citizenship, integrity, honour, accountability, mutual respect, leadership and service. These and other core values are fundamental to the IfE's community and the ethical standards of the IfE's and its members. These values form the basis of this [Code of Ethics](#). It is the responsibility of each individual to protect and support the IfE, its community members and its mission as a learning community.

2.2 Ethics and integrity are the responsibility of everyone. Therefore, every employee, lecturer, and any other person acting on behalf of the IfE, is responsible for ethical conduct consistent with this Code and IfE's [policies](#). The IfE's senior management team must assume responsibility for ensuring that their conduct, and the operations for areas which they supervise, complies with this Code. The IfE's [Code of Ethics](#) is a statement of our belief in ethical, legal and professional behaviour in all dealings within and outside of the IfE.

2.3 The Code includes references to relevant IfE policies and procedures. These references are not exhaustive and may be updated from time to time. The Code is intended neither to increase nor reduce the scope or coverage of any IfE policy.

3. Individual accountability and responsibility

3.1 Members of the IfE community are expected to exercise responsibility appropriate to their position and delegated authority. They are responsible to the IfE's community for their actions and their decision not to act. Each individual member is expected to conduct the business of the IfE in accordance with this [Code of Ethics](#) in order to best serve the interests of the IfE.

- 3.2 All Employees and persons on a contract for service are responsible for prompt reporting of any violations of this Code to the Human Resources Manager, or any other instances of reasonably suspected fraud. Violations of the [Code of Ethics](#) may result in termination from the IfE or disciplinary action.
- 3.3 No employee, or person on a contract for service shall retaliate, in any manner, against an individual who reports a perceived conflict of interest matter pursuant to this policy. An employee, or lecturer who makes such a report in bad faith shall be subject to disciplinary action.

4. Respect for the rights and dignity of others

- 4.1 The IfE is an institution dedicated to the pursuit of excellence and facilitation of an environment that fosters this goal. Central to that institutional commitment is the principle of treating others civilly and professionally. The IfE values the safety, privacy, property, personal rights and dignity of others. It endeavours to promote a community free from illegal or inappropriate conduct, including threats, violence, harassment, intimidation, coercion, and discrimination.

5. Conflicts of interest

- 5.1 All employees, persons on a contract for service and course participants of the IfE have an obligation to avoid activities or situations which may result in a conflict of interest. Full-time employees are expected to place their primary professional loyalty with the IfE. All employees are expected to arrange their outside obligations, financial interests and activities as not to conflict with their commitment to the IfE. Employees must not use their official positions to secure unwarranted privileges or advantages for themselves or others.
- 5.2 All employees, and persons on a contract for service have an obligation to examine any situation in which they may have a conflict of interest and take steps to resolve the conflict. Any employee or lecturer who is concerned that a conflict may exist or how to resolve it should consult with the senior management team of the IfE. Upon determination that a conflict of interest exists, appropriate action will be taken, through recusal, reassignment or other means to resolve the conflict of interest. No action will be taken without the opportunity for the involved employee, or lecturer to be heard with regard to whether a conflict of interest exists and what action, if any, should be taken.
- 5.3 The potential for a conflict of interest extends across a wide range of activities in the IfE. Conflicts of interest which must be avoided by employees, and persons on a contract for service, but are not limited to:

- Personal relationships in the workplace and classroom

- Outside activities
- Any directorship, partnership, agency or any shareholding;
- Any interest in any activity or business in which or with which the IfE is engaged;
- Any interest in goods or services recommended or supplied to the IfE

6. Acceptance of gifts or benefits

6.1 No employee or any member of the IfE shall accept gifts or services such as might be deemed to create an obligation, real or imagined. A gift can be interpreted as an inducement or a reward simply because of its intrinsic value and therefore only token gifts may be accepted.

7. Personal and professional behaviour of employees and persons on a contract for service

7.1 Employees shall perform any duties associated with their positions diligently, impartially and conscientiously, to the best of their ability. In the performance of their duties, employees shall:

- Keep up to date with advances and changes in their area of expertise;
- Comply with any relevant legislative or administrative requirements;
- Treat course participants and other staff members with courtesy and sensitivity to their rights;
- Provide all necessary and appropriate assistance to course participants;
- Maintain adequate documentation to support any decisions made;
- Strive to obtain value for the IfE's money spent and avoid waste and extravagance in the use of the IfE's resources;
- Not take or seek to take improper advantage of any official information gained in the course of employment;
- Not wilfully supply incorrect or misleading information;
- Not indulge in favouritism or nepotism.

7.2 At all times the behaviour of an employee or lecturer shall be in such a way as not to discredit his or her position and not to reflect adversely on the public service. Employees shall be expected to give full support to the Government of the day regardless of which political party or parties are in office. When implementing Government policy, employees' own values and beliefs shall not take precedence over those explicit or implicit in Government policy.

7.3 Employees shall not harass or discriminate in work practices on the ground of sex and family responsibilities, age, race/ethnic origin, religion/belief, sexual orientation and gender identity, gender expression and sex characteristics, as well as disability when dealing with their colleagues and or course participants. Employees have a duty to report to a senior employee any unethical behaviour or wrongdoing by any other employee during the course of their duties.

8. Social media

8.1 The IfE appreciates that social media can be a fulfilling way to share our work with colleagues, clients, customers and co-workers. However, the use of social media also offers risks and carries with it certain challenges and responsibilities. To assist us in making responsible decisions about our use of social media, we feel it is appropriate to follow the [Policy on the Use of Social Media](#) in the Public Service which includes standards and guidelines which all employees and persons on a contract for service need to adhere to.

9. Protection and proper use of the IfE's assets

9.1 All employees and persons on a contract for service are all required to maintain the confidentiality of non-public information about the IfE, records, and data entrusted to the IfE, except when disclosure is authorized by an appropriate employee of the IfE and/or authorized or required at law.

9.2 Employees and persons on a contract for service are likewise required to safeguard IfE property and other assets, and to use them responsibly and properly - that is, within the accepted parameters of use and permissions. Unauthorized access, use or disclosure of IfE records or assets, including but not limited to misappropriation, forgery, and falsification or fraudulent alteration of IfE records, are all prohibited.

10. Honesty, integrity and good faith

10.1 Honesty, integrity and good faith are fundamental to ethical behaviour and members of staff are required to conform to these ethical values in all their activities and interactions with colleagues, course participants and other stakeholders.

11. Ethical conduct in course participants' education and research

- 11.1 The IfE is committed to the highest standards in education and research, and to conducting these activities with integrity, objectivity and fairness and in compliance with all applicable laws.
- 11.2 It is expected that employees will be open and transparent in their relationship with course participants and conform to best safeguarding practice when engaged in educational activities.

12 Record keeping and reporting

- 12.1 To ensure transparency, accountability, and compliance with law, and because of its obligations as an organisation entrusted with public and private funding, the IfE depends on rigorous observance of accounting, financial recordkeeping, reporting and other standards and policies and on the maintenance of internal audit, internal control and compliance mechanisms. When such tasks are required by their job responsibilities, employees must record, allocate, and document revenue, expenditure, time, effort and other information in a way that is accurate, clear, complete and timely. Employees should also perform their duties with due care for the safety, security, preservation and good stewardship of all resources.

13. Health and safety

- 13.1 The IfE is committed to protecting the health and safety of its employees, persons on a contract for service, and visitors and ensuring the security of the IfE's premises and facilities.
- 13.2 The employees of the IfE, persons on a contract for service, and visitors must observe, and facilitate the adherence to the relevant law, regulations, standards and policies and the observance of sound practices relating to matters of health and safety, including professional development rooms and workplace safety, and the operation of IfE facilities and equipment. Individuals should report promptly any threat or risk to health or safety, whether it be their own or others', and should take reasonable steps to promote physical security.

14. Environmental sustainability and appropriate use of IfE resources

- 14.1 The IfE seeks to minimise its environmental impact and to utilise resources in an efficient and sustainable manner and is committed to establishing a culture where environmental sustainability is constantly improved.

- 14.2 The IfE encourages environmental awareness among its employees, persons on a contract for service, course participants, suppliers and contractors in order to ensure that everyone has a role in minimising adverse effects on the environment.
- 14.3 Employees are responsible for managing and protecting IfE property, financial assets and other resources with due care. They should ensure that the IfE's resources are employed appropriately for the benefit of the IfE and in a manner consistent with all legal requirements. They should neither waste IfE resources nor use them for personal benefit or for the benefit of a non-IfE entity, unless appropriate approval has been acquired. The IfE engages in a policy of ethical investment of its funds and through its procurement processes ensures its suppliers conform to ethical standards.

15. Information privacy, confidentiality and security

- 15.1 Employees should handle information in ways that respect individual privacy and protect the IfE's interests. They may, by virtue of their roles and responsibilities have access to information that is personal, confidential, sensitive, or legally protected. Such information may relate to course participants, research subjects, research sponsors, contractors, and others. Careful treatment of such information, including observing applicable laws, policies and procedures for obtaining, securing, maintaining, handling, divulging and destroying it, is of utmost importance, as is limiting the use of such information to the purpose for which access was granted.
- 15.2 Personal data that is processed by the IfE is regulated primarily by the [General Data Protection Regulation](#) (GDPR), the [Data Protection Act](#) (Chapter 586 of the Laws of Malta) and legal notices emanating under this Act. This applies to data that is held in both manual and electronic formats. Personal data refers to information that directly or indirectly identifies a natural person through physical, physiological, mental, economic, cultural or social factors. Sensitive personal data is that personal data that reveals race/ ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, health or sex life.

16. Compliance with applicable laws and regulations

- 16.1 Higher education institutions are subject to many of the same laws and regulations as other businesses. There are also additional requirements unique to higher education. All employees, persons on a contract for service and course participants are expected to become familiar with the laws and regulations that affect their areas of responsibility.
- 16.2 A number but not all legal requirements are detailed in the IfE's [policies](#). Failure to comply may have serious adverse consequences both for individuals and for the IfE in terms of reputation, finances, and the health and safety of the IfE's community. The

IfE's business is to be conducted in conformance with legal requirements. Employees, and persons on a contract for service who have queries regarding the interpretation of legal requirements should contact the senior management team of the IfE.

17. Compliance with the IfE's policies and procedures

- 17.1 The IfE's [policies and procedures](#) are designed to inform employees, persons on a contract for service and course participants about responsibilities, to set minimum standards, and to give the IfE's community notice of expectations.
- 17.2 Members of the IfE community are expected to transact all IfE business in compliance with [policies and procedures](#) and have an obligation to become familiar with those that affect their areas of responsibilities. Employees, and persons on a contract for service are expected to seek clarification from the Head Quality Assurance on a policy or procedure that they finds to be unclear, outdated, or in conflict with the mission of the IfE.

18. Internal Quality Assurance

- 18.1 Internal Quality Assurance (IQA) is the process used to help ensure that the IfE's business is carried out in accordance with this [Code of Ethics](#), IfE [policies and procedures](#), applicable laws and regulations, and best business practices (refer to the [Policy for Quality Assurance and Enhancement](#)). It helps to promote efficient operations, accurate financial reporting, protection of assets, and responsible fiscal management.
- 18.2 All employees and persons on a contract for service of the IfE are responsible for internal quality assurance. Every member of the IfE is specifically responsible for ensuring that internal controls are established, properly documented, and maintained for activities within their jurisdiction. Any individual entrusted with funds is responsible for ensuring that adequate internal controls exist over the use and accountability of such funds.

19. Political participation and comment of employees

- 19.1 Employees need to ensure that their participation in political activities does not bring them into conflict with their primary duty to serve the Government of the day. This is important in order to maintain ministerial and public trust in the impartiality of the advice given, and actions taken, by public employees.
- 19.2 Likewise employees need to ensure that the spirit of the previous paragraph hereof is respected whenever they are asked to make a public comment. Public comment

includes public speaking engagements, comments on radio and television and expressing views in letters to the newspapers or in books, journals or notices or where it might be expected that the publication or circulation of the comment will spread to the community at large. Determining what is appropriate in any particular case will depend on the extent of the participation of the individual, the nature of the issue, the position held by the individual and existing regulations within the organisation concerned.

- 19.3 If an employee becomes aware that a potential conflict, whether real or apparent, has arisen or is likely to arise, the employee shall immediately inform the CEO of the IfE. If a conflict of interest does arise, the employee may have to stop participating in political activity or withdraw from areas of his or her duties giving rise to the conflict of interest.

20 Sanctions

- 20.1 Sanctions may be applied if employees, or persons on a contract for service are involved in breaches of this [Code of Ethics](#). The sanctions applied shall depend on the seriousness and nature of the breaches and may entail formal disciplinary and, or criminal action as applicable. Whenever appropriate, counselling by a member of senior staff may also be given.

21 Relevant documents

- [Equality Act](#) (CAP. 456)
- [Data Protection Act](#) (CAP 586)
- [Disability Act](#) (CAP. 413)
- [General Data Protection Regulation \(GDPR\) \(EU\) 2016/679](#)
- [Policies and Procedures](#) of the IfE
- [Policy for Quality Assurance and Enhancement](#)

22 Version history

Originator	Version	Date	Changes Done
QA Department	1.0	29/05/2017	Initial Release
HR Department	1.1	21/04/2020	Included article 9.
QA Department	1.2	12/01/2021	Updated Mission Statement
QA Department	1.3	26/01/2021	Updated article 7.
Admissions Department	1.4	02/02/2022	Included article 8.

HR Department	1.5	21/03/2022	Removed the reference to Course Participants from Policy
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