

# Code of Conduct

*of the project: “The Universities’ Reaction to Big Obstructions: Building resilient higher education to respond and manage societal crises (TURBO)”*

Project: 101129315-TURBO-Erasmus-EDU-2023-CBHE

The Code of Conduct<sup>1</sup> represents the collection of key principles and values, which constitute the basis of professional activities and ethical concerns for parties involved in the execution of the TURBO project.

The Code of Conduct is an integral part of the project’s internal control system, which is built on the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework<sup>2</sup>. The COSO-framework encompasses three groups of objectives, including operational efficiency, enhancing the quality of financial reporting and compliance with regulations. Thus, this Code of Conduct was created for parties involved in the execution of the TURBO project to assure that all project participants demonstrate commitment to integrity and ethical values.

## **This Code of Conduct applies to the following groups of project parties:**

- Project coordinator: Nord University (NU);
- Project beneficiaries: Akademia Leona Kozminkiego (KU), International Foundation of Social Adaptation (IFSA), Chernivtsi National University Yuriy Fedkovych (YFCNU), Lviv Polytechnic National University (LPNU), West Ukrainian National University (Wunu), Taras Shevchenko National University of Kyiv (KNU), Chernihiv Polytechnic National University (CPNU), South Ukrainian National Pedagogical University named after K.D.Ushynsky (SUNPU) and Vinnytsia National Technical University (VNTU)

By publishing this Code of Conduct, the project coordinator is responsible for communicating it to all current and new project personnel involved. It is expected that all project Parties (according to the Consortium Agreement (CA)) adhere to this Code of Conduct. All parties should sign a declaration that they have read and understood the Code of Conduct.

## **1. Concern for society and IDPs**

As project parties, we aim to contribute to Ukrainian society by increasing the resilience, preparedness, and responsiveness of Ukrainian HEIs by adopting more flexible educational offers (micro-credit courses) that will contribute to the professional and social adaptation of IDPs. All project parties are expected to consider public interest in order to achieve equal treatment of all project members and IDPs and show respect to all individuals. The project supports universal human rights to education, non-discrimination, and freedom of expression. Any form of harassment or other improper conduct is

---

<sup>1</sup> This document was developed based on the following laws and institutional regulations: (i) Ethical Guidelines for the Public Service by the Norwegian government (2006); (ii) Order of the National Agency of Ukraine on Civil Service “On approval of the General rules of ethical conduct of civil servants and local government officials” (2016); (iii) Code of ethics for employees at NTNU (2017); (iv) Grant Agreement and Consortium Agreement for the Project: 100029315-TURBO-Erasmus-EDU-2023-CBHE; (v) Ethical Guidelines for buying goods and services (including travels) at Nord University.

<sup>2</sup> The Committee of Sponsoring Organizations of the Treadway Commission (COSO): <https://www.coso.org/>

unacceptable. No one is to be discriminated or judged against because of his/her gender, race, ethnicity, political views or other factors.

## **2. Regard for the project's reputation**

By project's reputation, we mean the opinion held by the public about the project, its performance and actions of project parties. All project parties are required to perform his/her duties without damaging the project's reputation. Project participants must be aware of how their behavior affects the project's reputation. Abuse of drugs, alcohol, racism, bullying, discrimination, and harassment is unacceptable. Project participants must not provide unjustified information and promises regarding the project activities. Sexual harassment and other forms of abuse of professional authority are firmly condemned. Sexual harassment is illegal. Sexual harassment is a barrier to the educational, scholarly, and research purposes of the University. The determination of what constitutes sexual harassment will vary with the particular circumstances, but it may be described generally as unwanted sexual behavior, such as physical contact or verbal comments or suggestions, which adversely affects the working or learning environment of an individual.

## **3. Duty of obedience and ethical behavior**

Project parties must comply with the ethical rules described below and in GA §14.2. Project beneficiaries must follow decisions by the project coordinator; however, the duty of obedience entails no obligation to follow decisions to do anything illegal or unethical. Unethical behavior is a factor threatening the sustainability of the project. Cases of corruption are not tolerated, according to GA §32.3.1. (h).

All the decisions taken by project parties should be based on common ethical standards. Research should be carried out according to good ethical research practices and accepted scientific norms (REF – each university; NU<sup>3</sup>). In case a project participant has a doubt on the right decision or choice, this should be discussed with the project coordinator. All project participants carry equal responsibility for creating a positive working environment and maintaining a friendly atmosphere at work. In case of conflicts, the Conflict Resolution Strategy should be followed.

All project parties carry a personal responsibility for compliance with the laws and regulations and for the performance of work in an ethical way. This implies that:

- Project participants follow good administrative practices and routines of impartiality (e.g., assessing and disclosing their own disqualifications) and build their work based on their professionalism and fair judgement. In case of their own impartiality, the project participant should inform the nearest supervisor.
- Project participants act as good role models; their decisions must be loyally followed unless anything illegal or unethical is required.
- All project participants must have a conscious attitude to the way their conduct within the project and outside can influence public trust in performed project activities and results achieved.

---

<sup>3</sup> <https://www.nord.no/en/research/for-researchers/research-ethics>

#### **4. Duty to report**

In order to implement measures to avoid or limit losses or damages, project participants are required to report to project institutional coordinators any circumstances of which he/she is aware that could cause the employer, employee or the surroundings to suffer losses or damages.

#### **5. Duty of efficiency**

Project parties are required to use the project resources in the most economical and rational manner possible and shall not abuse or waste the project's funds. Reaching the established targets in a good and efficient manner requires striking a balance between efficiency and the use of resources, thoroughness, quality, and good administrative practice. The actions performed by project parties must assure that project funds are spent according to the agreements. In cases when agreements cannot be fulfilled as stated, it should be taken up with the project coordinator. Project parties must be aware of how their behavior and decisions might affect the external environment and sustainable development. If project participants find ways to get the same output with less resources, they can consult a work package leaders group (WPLG) via institutional coordinator on how the saved resources can be used to strengthen other related project activities. This includes the use of electronic document management and limiting unnecessary travels, which contribute to a decrease of greenhouse emissions.

#### **6. Freedom of information**

There should be openness and transparency throughout the administration of the project so that the general public can understand project activities. The system of social audit developed for the project should provide insights on how project activities are performed. The project's freedom of information is based on a principle of FAIR Data<sup>4</sup>: "as open as possible, as closed as necessary" and also follows the GDPR (General Data Protection Regulation)<sup>5</sup>. In the case of conducting research and collecting data – a separate data management plan applies.

#### **7. Project parties' freedom of expression**

Project parties hold a fundamental right to express opinions about the project activities and all other matters, which are not limited by article 10 in CA and article 14 in the Grant Agreement (GA).

#### **8. Whistleblowing**

Project parties must be able to report circumstances in the project that are worthy of criticism directly to the project coordinator. If a project participant believes that a violation of any kind (e.g., laws, regulations or ethical norms) took place and this can threaten the project achieving its objectives, a case should be reported to the project lead (via "red button").

#### **9. Confidentiality and sensitive data**

All project participants must be careful about how they treat confidential information. – see Article 13 in GA.

---

<sup>4</sup> [FAIR Principles - GO FAIR \(go-fair.org\)](https://go-fair.org)

<sup>5</sup> <https://www.nord.no/en/about/privacy>

## **10. Gifts and other perquisites**

Hospitality, socializing and gestures of appreciation are recognized as generally accepted and courteous behavior as long as it does not violate the national legislation and Parties' institutional regulations. However, project participants shall not, on their own behalf or on behalf of others, accept or facilitate the acceptance of gifts, travel, hotel accommodations, hospitality, discounts, loans or other products or services that can influence their impartiality. This does not relate to objects or activities according to project's agreements and financed by approved project funds. Details on purchasing goods and services are outlined in the Procurement procedures of the project.

Project participants must not use their position to gain an undue advantage for themselves or anyone else. This also applies in cases where these advantages would not affect their service-capacity actions. Project participants shall not, as part of discharging their duties, give or offer gifts or other perquisites that are appropriate to, or intended to, sway the recipient's service-capacity actions.