

# Code of Ethics 2021



**CAMBRIDGE**  
UNIVERSITY PRESS & ASSESSMENT



## Message from Peter Phillips, Chief Executive

At Cambridge University Press & Assessment, we celebrate our rich history whilst recognising that we are part of an ever-evolving world. As a part of the University of Cambridge, our mission is to contribute to society through the pursuit of education, learning, and research at the highest international levels of excellence.

As an organisation devoted to education, we must lead by example. We recognise that there is a connection between societal progress and economic progress and think that the health of our organisation depends on the health of the environment and the wellbeing of humanity. Accordingly, when publishing content and conducting assessments around the world, we seek to operate in a socially responsible and sustainable way.

This Code of Ethics is designed to serve as a reference guide for making decisions and how to conduct ourselves. It defines how we must act to ensure we maintain our proud tradition and the values of the great University of which we are a part. Following our Code ensures that we will remain a force for good in our communities.

We are all works in progress, continuously looking for ways that we can do better today than we did yesterday. If you are unsure about the right course of action, never be afraid to ask. It is also critical that you speak up if you believe someone is not acting in accordance with our values and Code. If you come to us with a concern, we will support you.

Thank you for helping to protect the legacy of University of Cambridge and for helping us to live our values every day.

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# Our purpose and values



## Empowerment

Take accountability for our decisions in order to create an environment that our people and customers can succeed in.

- We own the work that we do.
- We make informed and timely decisions.
- We enable ourselves and others to succeed and thrive.



## Collaboration

Work together effectively as part of an inclusive and diverse global network to create better outcomes.

- We act as a community.
- We advocate for, and foster, an inclusive culture.
- We ensure effective communication across our teams and with our customers.



## Responsibility

Act with efficiency and care to ensure that we, and our profits, contribute to society and our planet.

- We use our resources to maximum effect.
- We respect our planet.
- We act with integrity.



## Innovation

Learn continuously to improve and make things better for our customers.

- We put the customer's needs at the heart of what we do.
- We embrace change.
- We foster an environment of learning and growth.

# Your reference guide

This Code is our cornerstone, the foundational document that all our organisational policies and principles have been built around. It is a reference guide, designed to support your day-to-day decision making. This Code cannot possibly cover all circumstances. Instead, it details how Cambridge's values apply to various organisational activities, directs you towards relevant policies, and outlines a framework for making sound decisions.

If you find yourself in a tricky situation, please ask for help. Our business ethics and compliance team is always here to explain our policies and help you navigate challenging issues.

## Does this code apply to you?

The short answer is yes! The Code applies to:

- All Cambridge colleagues, no matter their title, job responsibilities, or location.
- All third-party business partners including assessment specialists, consultants, joint venture partners, freelancers, agents, distributors, and suppliers.

While they aren't bound by our Code, we also hold our authors, learned societies, and editorial contributors to the same high ethical standards that they can expect from us.

Colleagues who violate our Code may be subject to disciplinary action, up to and including dismissal. Additionally, we can, and will, terminate a relationship with any third-party business partner or editorial contributor if we have concerns about their ethical conduct, whether towards our colleagues, the public, or our content.

## Colleague responsibilities

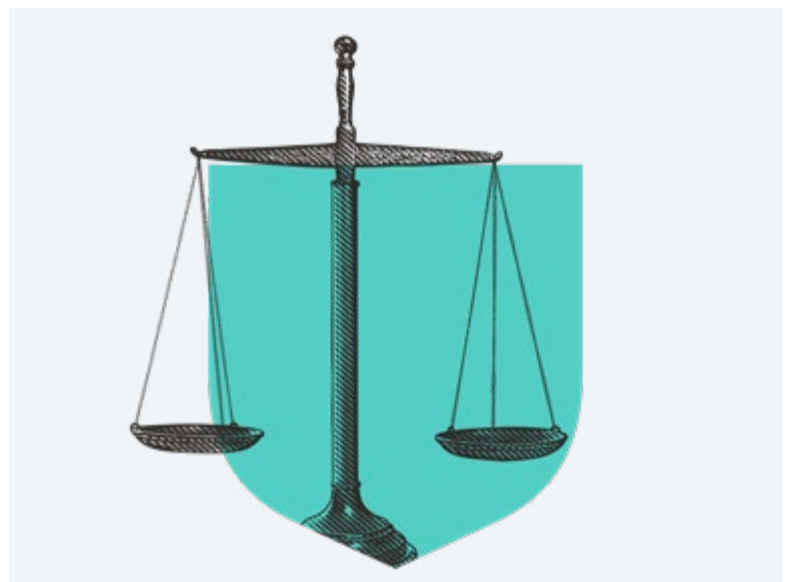
All colleagues have the opportunity to contribute positively to our culture. We are all responsible for making sure our actions are ethical, responsible, and sustainable. In all that you do you must:

- Be aware of the potential risks that are relevant to your job responsibilities and location.
- Be knowledgeable about the Code and the policies that are relevant to your role and make sure that you understand those policies and know how to apply them.
- Be willing to promptly ask for help if you don't understand an issue or if you suspect misconduct.
- Be proactive about living our values and following our Code.

## Leaders' responsibilities

Our leaders, including our senior management team and executives, as well as anyone who manages people, must lead by example. Leaders are responsible for creating a culture of integrity and openness where colleagues understand their responsibilities and feel comfortable speaking up without fear of retaliation. If you are a manager, you must:

- Be aware of the example you set and always model Cambridge values.
- Be knowledgeable about the messages you send and reinforce that no objective is ever worth compromising our integrity.
- Be willing to listen and make sure that your colleagues know they can always come to you, even if they are bringing bad news.
- Be proactive about communicating the importance of ethics and compliance and to holding the people who report to you accountable.



# What to do when you don't know what to do – our ethical decision-making framework



As we mentioned above, this Code cannot possibly give guidance on every circumstance you may encounter at work. If you find yourself in a situation where you don't know what the right decision is, **PAUSE**.



**Ask** yourself the following questions which are designed to help you determine whether the decision is an ethical one:

Is this potential decision legal and consistent with Cambridge's policies and Code?

Is this potential decision consistent with Cambridge's values of collaboration, responsibility, innovation, and empowerment?

Are you personally comfortable with this decision? Would you be comfortable with your friends and family knowing that you made this decision? Do you believe it is ethical?



If you answer any of these questions with a 'no,' or even a 'maybe' or 'I don't know,' **STOP**. Do not move forward until you ask for additional help and guidance from your manager, the business ethics and compliance team, or the Speak Up Portal.

# Speaking up and seeking guidance

We believe that our organisational goals should never be achieved at the expense of high ethical standards. To ensure that Cambridge stays on the right path, we strive to make it as easy as possible to speak up when something seems amiss. We encourage our colleagues and everyone we work with to raise concerns, and we prohibit retaliation against anyone who reports a concern in good faith.

## How to ask a question or raise a concern

When reporting an issue, you should be as specific and detailed as possible so the person taking the report understands your concern. In many situations, your manager will be in the best position to resolve your question or concern. However, if you don't have a direct manager or don't want to discuss an issue with your manager, you can contact any of the people and groups listed below:

- Speak up champions
- Business ethics and compliance team
- People and culture team
- Our confidential speak up portal.

## No tolerance for retaliation

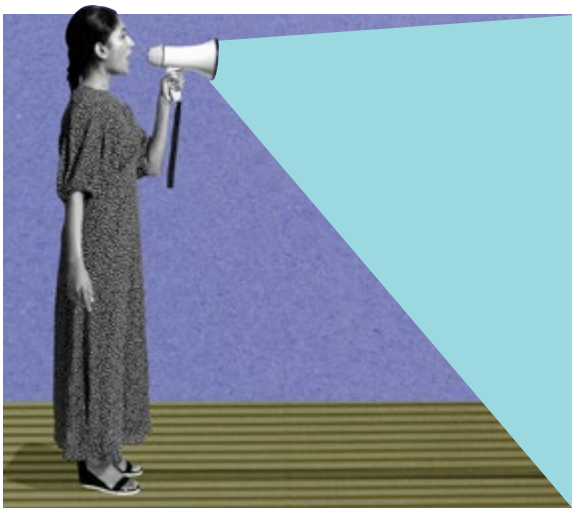
It takes courage to speak up when you notice an issue. Any retaliation – whether direct or indirect – against an employee who raises a good faith concern is grounds for disciplinary action, up to and including dismissal.

## How leaders should handle concerns

If you are a leader and someone approaches you with a concern, you have a special responsibility to listen and act. Handling the situation appropriately is an important part of resolving issues fairly and building trust.

If someone brings a concern to you, you should:

- **Listen carefully:** remember that the person who has approached you has done something difficult and very important. Thank them for upholding Cambridge's values and for helping to create a better organisation.
- **Respond respectfully:** take every concern seriously, even if you disagree or have questions about the reporter's motives. Make sure the reporter knows you are committed to addressing the issue.
- **Protect confidentiality:** avoid discussing the conversation with others and only share details on a need-to-know basis.



## Reporting concerns

If you need to make a report, there are several ways to do so. Please choose whichever reporting option you are most comfortable using. Whichever option you choose, your confidentiality will always be respected. Your options include:

- Speaking to one of our Local Speak Up Champions
- Contacting our Global Business Ethics and Compliance Officer at [cgodwin@cambridge.org](mailto:cgodwin@cambridge.org) or at +44 1223 325688
- Contacting a member of our People and Culture Team.
- Visiting our confidential Speak Up Portal at <https://cambridge.whistleblownetwork.net/frontpage>

Reports may be made anonymously, where permitted by local law. However, disclosing your identity allows our organisation to conduct a more expeditious and thorough investigation.

# Our fundamental commitments: publishing and educational integrity

Educational integrity is at the heart of our business. Our assessments are only of value if these inform the learning process and reflect the true status of an individual's knowledge and understanding. We follow the Cambridge Approach to Assessment to ensure that our assessments are fair, have sound ethical underpinnings, and operate according to the highest technical standards.

To ensure that we are upholding the standards associated with our University, we subject all of our academic publications to a rigorous, ethical, and editorially independent publishing programme, including a comprehensive peer-review process. Similarly, our teaching and learning materials are subjected to a stringent validation and approval process. Additionally, we strive to prevent our editorial independence from being compromised by any form of personal, business, financial, or political influence.

We are also fully committed to the principle and promotion of freedom of speech and expression. We believe that it is important that our products are widely available and widely used and stand against censorship or restrictions imposed on our publications. We work to disseminate knowledge to the widest possible audience and to serve communities in countries around the world. To this end, we support fair access to our publications through offering free and low-cost access for researchers in many developing-, low- and middle-income countries and by providing fee waivers in certain situations.

## Raising concerns

Any concerns regarding our publishing and educational integrity can be raised through the following channels:

### Assessment Integrity

#### OCR:

[www.ocr.org.uk/contact-us/complaints-policy](http://www.ocr.org.uk/contact-us/complaints-policy)

#### Cambridge Assessment English:

[www.cambridgeenglish.org/help/complaints](http://www.cambridgeenglish.org/help/complaints)

#### Cambridge Assessment International Education

[www.cambridgeinternational.org/about-us/our-standards/how-cambridge-manages-feedback-and-complaints](http://www.cambridgeinternational.org/about-us/our-standards/how-cambridge-manages-feedback-and-complaints)

#### IELTS

[www.ielts.org/info-pages/contact-us](http://www.ielts.org/info-pages/contact-us)

### Publishing ethics

Your relevant editor or email  
[publishingethics@cambridge.org](mailto:publishingethics@cambridge.org).

## Publishing and educational integrity

We respect and uphold the intellectual property rights of our authors and contributors, publishing partners, and other third parties. We expect and encourage those we work with to have the same level of respect for intellectual property rights as we do.

To help protect intellectual property rights we:

- Invest in an ongoing, worldwide anti-piracy and brand protection programme to address illegal copying and unauthorised use of our publications.
- Work with industry groups and local law enforcement to drive more effective anti-piracy campaigns and initiatives.
- Tailor our approach to defeating piracy to address specific threats and to achieve the best outcomes for both our authors and customers.



# Excellence, integrity, and inclusion at work

## Promoting equality, diversity, inclusion and belonging

We are committed to equality, embedding diversity, removing barriers to inclusion, and promoting equity in every aspect of our employee and customer experience. We seek to support all colleagues, contractors, scholars, readers, and learners irrespective of their personal identity and strive to produce products and services that demonstrate and support diversity and inclusion.

### Our organisational responsibilities

- We stand against discrimination in all its forms, including ageism, ableism/disability, homophobia, racism, sexism, xenophobia, and discrimination based on gender, neurodiversity, political views, religion, trade union membership, or other personal identities and beliefs.
- We provide equal opportunities in all aspects of employment and will continue to improve representation at all levels.
- We listen to and work with our colleagues of all backgrounds and identities and value and respect the contribution made by all underrepresented groups including colleagues of colour.
- We will continue to give free access to our publishing on equality, diversity, and inclusion at times when doing so will have a large, positive impact.
- We seek to amplify marginalised voices, represent, value and encourage diversity through our products and services to drive change and progress, broaden horizons, and improve understanding.
- Our inclusive curricula and qualifications will represent our learners and enable them to demonstrate and achieve their potential.

### How you can help

- Take a proactive stance against bias in your work environment and relationships, by identifying and removing barriers so that everyone feels they belong.
- Recognise where implicit or explicit biases may be impacting your professional activities and actively work to counter all forms of discrimination, promote equality and be inclusive in your professional endeavours.
- Provide us with feedback about whether Cambridge is hitting the mark when it comes to diversity and inclusion.
- Recognise and acknowledge cultural differences and learn about the cultures you are interacting with and openly share your own experiences to promote dialogue.

### Commitment to change

As an organisation devoted to education, learning, and research, we believe that we can and should be a strong global voice against racism and for diversity and inclusion. But we also recognise that we need to change ourselves.

Following the death of George Floyd and the international protests that highlighted the continuing racism faced by Black people, we made a public commitment to change. Since then, we have published an Anti-Racism Action Plan that outlines specific actions that we will take to tackle racism. Our goal is to create an anti-racist culture that champions racial equity, encourages discussions about racism, and empowers our colleagues to condemn racism in all its forms. You can find more information about our anti-racism work here. We will continue to develop our plans and to report on progress.

## Ensuring respect and dignity at work

We recognise the importance of treating all individuals with respect and dignity and advocate the elimination of all kinds of harassment.

### Our organisational responsibilities

- We do not tolerate any form of harassment, discrimination, bullying, or any other type of intimidation by colleagues or third parties they work with.
- We recognise that many forms of harassment may constitute unlawful discrimination and will support any investigations into such matters.
- We provide resources and reporting options for anyone who experiences retaliation and protect anyone who makes a report from further discrimination or retaliation.

### How you can help

- Always treat others with respect and dignity.
- Do not unfairly consider an individual's race, gender, sexual preference, disabilities, or other identities when making business decisions.
- Remember that our rules apply even outside the workplace – act appropriately during office functions, business trips, and other events.
- If you witness or experience bullying, discrimination, or harassment, let us know.
- If someone approaches you to make an allegation of harassment, discrimination, bullying, or any other type of intimidation take them seriously, help them decide what they should do next, and ensure that you maintain their confidentiality. If you are unsure of how to help, contact any individuals or groups outlined in the Speak Up section above.

## Keeping colleagues safe

We are committed to the promotion of health and safety for all colleagues and others who may be affected by our work.

### Our organisational responsibilities

- We adhere to the highest levels of health and safety standards and maintain safe and healthy working conditions.
- We provide resources to help our colleagues maintain their physical and mental health.
- We make regular safety inspections and respond promptly to new or developing health and safety concerns.

### How you can help

- Take reasonable care of your own safety at work and consider the safety of those around you.
- Promptly report any safety or health issues and raise any questions with our health and safety teams.
- If you are a manager, escalate all health and safety issues and ensure that appropriate corrective and preventative actions are followed.

### Covid-19

Our commitment to the health and wellbeing of our teams was highlighted by our swift response to the Covid-19 outbreak. We established a Covid-19 working group in January 2020 to facilitate a coordinated approach across the organisation. Where feasible, our colleagues were required to work from home and were equipped with resources to do so effectively, including laptops, suitable ergonomic chairs, monitors, keyboards, and accessories for those who needed them.

At our testing sites and operations centres, we swiftly implemented Covid-focused safety measures including discrete shift patterns, workplace and process redesign, and a testing programme. This allowed our business to continue to meet the needs of our learners while protecting our colleagues and contractors. We also worked to support colleagues with the psychological impact of the pandemic. Flexible working was promoted to ensure that colleagues could balance work and home demands and emotional support was provided through various programs.

# Respectfully interacting with learners, customers, and business partners

## Safeguarding and protecting learners

We strive to protect children and other vulnerable people in our interactions with them, speak up where we have concerns, and promote safeguarding through the products and services we offer.

### Our organisational responsibilities

- We put controls in place so that children, young people, and vulnerable adults stay safe when interacting with us.
- We maintain processes to report and escalate safeguarding and child protection concerns.
- We create inclusive and age-appropriate products, services, and content which are safe for all learners.

### How you can help

- Identify and take opportunities to promote the importance and value of safeguarding and know when you have a legal duty to report alleged or suspected abuse.
- Promptly report concerns about the safety or wellbeing of a child, young person, or vulnerable adult to your manager and to outside protection agencies when appropriate.
- If, after reporting your concern, you do not think appropriate action has been taken, escalate the issue to a speak up champion, the business ethics and compliance team or by using our speak up portal.





## Communicating with the Public

We speak truthfully and accurately about our products and services and ensure that all our communications are based on facts and evidence. We do not make misleading statements or statements that are open to misinterpretation.

### Our organisational responsibilities

- We communicate honestly and openly with all who have an interest in our organisation, including colleagues, suppliers, and customers.
- We appoint authorised persons to speak with the media on behalf of Cambridge.
- We follow all applicable laws regulating advertising and marketing activities.

### How you can help

- Never speak on behalf of Cambridge unless you are specifically authorised to do so.
- Do not use personal social media accounts to make statements on behalf of the organisation.
- Remember that harassment, bullying, discrimination, or retaliation that is not permissible at work is also not permissible online.

## Fair competition and antitrust

We never engage in anti-competitive practices or seek to limit competition through illegal or unfair means.

### Our organisational responsibilities

- We comply with all applicable anti-trust and competition laws and regulations.
- We do not exert inappropriate pressure on suppliers or customers.
- We always make commercial decisions independently.

### How you can help

- Never share confidential business information with other publishers, assessment providers, or anyone else that could be considered a competitor of Cambridge.
- Do not coordinate, directly or indirectly, with competitors to determine the price of products or the markets in which products will be distributed.
- Do not attempt to control the resale prices customers may charge for our products.
- Do not work with other bidders to attempt to influence the outcome of a public or private tender.

# Conducting our activities ethically and sustainably

## Preventing bribery, corruption, and fraud

As an organisation, we act ethically, sustainably, and in compliance with all global laws and regulations – this is true even when doing the right thing might be more time consuming, expensive, or could cost us business. We prohibit corrupt practices in any form, including bribery, kickbacks, extortion, fraud, and other unlawful payments.

### Our organisational responsibilities

- We will not give, offer, authorise, or take bribes in any form – that includes giving or receiving any payments, services, gifts, entertainment, or favours in order to obtain an improper business advantage.
- We will not make facilitation payments, namely payments given to encourage a government employee to perform an existing duty, no matter how small.
- We will maintain accurate books and records.
- We will not allow any third parties to engage in corrupt behaviour on our behalf.

### How you can help

- Understand that a bribe can be anything of value, not just cash.
- Do not offer or give money or anything else of value to someone in exchange for securing any advantage for Cambridge.
- Never do anything through a third party that you are not authorised to do yourself.
- When in doubt, ask for help. If you are concerned about bribery, contact the business ethics and compliance team for guidance.

## Gifts and hospitality

While it can be common to exchange gifts and hospitality in many professional situations, we take care to ensure that these business courtesies do not create a conflict of interest or otherwise violate the law or our Code.

### Our organisational responsibilities

- We do not offer or accept business courtesies where doing so could even appear to influence a business decision or where it could compromise or be reasonably seen to compromise the receiver's judgement, integrity, or impartiality.
- We only offer or accept business courtesies that are appropriate, proportionate, traceable, and transparent.

### How you can help

- Review our policies and procedures before offering or accepting business courtesies.
- Seek prior approval for business courtesies when required by Cambridge policy.
- Keep accurate records of all business courtesies you give or receive.

## Quality and standards

We put the needs and expectations of our customers and stakeholders at the heart of everything we do and only offer quality products and services which conform to our standards.

### Our organisational responsibilities

- To maintain quality and standards and achieve excellence we use management systems to provide control, assurance, and resilience.
- We make it clear what each person is accountable for and empower our colleagues to make decisions.
- We strive for continuous improvement and are transparent when things go wrong and focus on learning not blaming.

### How you can help

- Make sure you understand the processes you are involved in and your responsibilities within those processes.
- Highlight where you believe there are risks, issues, and improvement opportunities.
- Be open, honest, and constructive when discussing where something has gone wrong.

## Charitable and political activities

We use integrity and caution when contributing to charitable causes and do not participate in political activities outside of lobbying efforts directly related to our organisational activities.

### Our organisational responsibilities

- We will not use charitable donations as bribes or to otherwise further sales activities.
- We do not make corporate political contributions to any political party, political action committee, or candidate running for a government political office.
- Our political activities are limited to lobbying efforts directly related to our business.

### How you can help

- Before using Cambridge funds for charitable giving purposes, always obtain the required approvals. For assistance please contact the Head of Community Engagement.
- Never commit Cambridge funds to any political party or candidate.
- Take steps to ensure that your personal political opinions are not viewed as those of the organisation and never pressure another employee to join any political effort.

### Contributing to our communities

Our commitment to using integrity when contributing to charitable causes should not be viewed as an invitation to ignore our local communities. To the contrary, all colleagues are warmly encouraged to give their time to volunteering, fundraising, and supporting schools and young people in reaching their potential.

Our colleagues have been supported in making ethical and transparent donations to charities focusing on education, health, and the environment and we have donated books to multiple organisations around the globe. Charities receiving book donations included public libraries in Turkish municipalities supporting education volunteers and disadvantaged schools; Borderline Books which sends books to prisons, ex-offenders, asylum applicants and women's refuges in the UK; Build on Books which supports children living in poverty in Sierra Leone; and the Cambridge Refugee Resettlement Campaign, which provides assistance with housing, healthcare and education to resettled refugee families in Cambridge. Find more information on our charitable activities here.

## Global trade

We are committed to complying with applicable export and import controls, money laundering regulations, international sanctions regimes, and other relevant laws in the countries in which we operate.

### Our organisational responsibilities

- Maintain accurate and appropriate import, export, and customs records.
- Perform sanctions checks on appropriate individuals before doing business with them.
- Follow local laws and regulations when entering into agency agreements or participating in public tenders.

### How you can help

- Remember that no business result justifies violating international laws and regulations.
- Seek guidance from our legal and business affairs department if you have any questions about doing business in a particular country or proceeding with a particular practice or transaction.



## Regulations governing assessments

Many of our assessments are regulated by national agencies, including Ofqual in England. We believe that our regulatory obligations are best met by putting the interests of learners first and maintaining public confidence in the integrity of the assessments we provide.

### Our organisational responsibilities

- We recognise that regulations governing assessments extend beyond the development, delivery, and award of qualifications and impact many other areas of our work.
- We work to identify and manage issues and risks which could adversely impact learners or the integrity of our qualifications.
- We provide adequate resources and arrangements to develop, deliver, and award our qualifications.

### How you can help

- Understand the importance and impact of regulations across the organisation.
- Promptly raise any issues which are likely to cause Cambridge to not comply with relevant regulations.
- Seek guidance from our regulatory teams if you have any questions about our regulatory obligations.

# Being an excellent corporate citizen

## Human rights and modern slavery

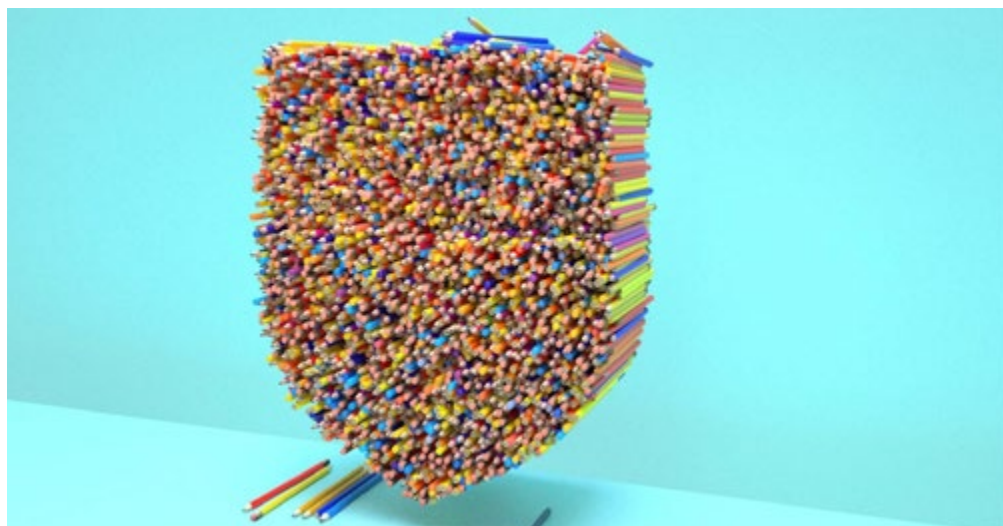
We support universal human rights and oppose illegal or inhumane labour practices. We advocate for the adoption of fair and sustainable practices across our supply chain and seek to lead by example through our own organisational efforts.

### Our organisational responsibilities

- We are committed to upholding and complying with the UN Declaration of Human Rights and modern slavery legislation.
- We conduct robust due diligence to ensure that no one in our supply chain is violating human rights.
- If we identify any abuse within our supply chain, where appropriate, we will work with our partners to improve conditions, but we will not hesitate to report abuses.
- We embrace the principle of collective consultation and give our colleagues the remit to drive and enact real change in our operations.

### How you can help

- Respect the human rights of everyone you interact with professionally, including learners, parents and guardians, colleagues and contractors, teachers and other educators, customers, supply chain workers, and the broader community.
- Conduct any third-party due diligence required by your position.
- If you suspect that a Cambridge supplier or business partner is violating human rights, promptly report the issue.





## Environmental stewardship

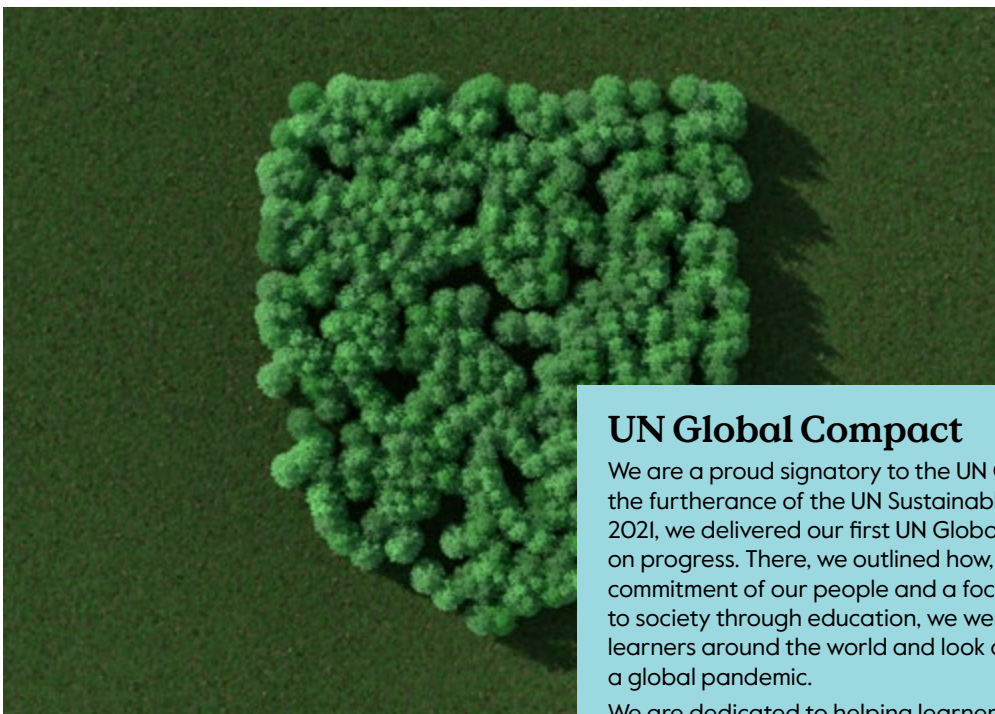
We recognise the climate crisis and know that we have a responsibility to address it. We aim to be a trusted leader in the drive for a sustainable world and seek to maximise the positive impact of our sustainability actions at the local, national, and international level through communication, collaboration, partnership working, and advocacy.

### Our organisational responsibilities

- We consider long-term sustainability and impact when making all financial and business decisions.
- We support innovations that make a positive impact on our environment.
- We aim to be carbon zero for our energy-related emissions by 2048 and work to drive down carbon emissions across our supply chain.
- We encourage our business partners to share our commitment to sustainability, and educate and engage our learners and teachers on the issue of sustainability.
- We operate a rolling programme of improvements to ensure the latest sustainability research is represented in our products and services.

### How you can help

- Always consider ways in which you can reduce the impact of your business activities on both the environment and society at large.
- Work to ensure that our resources are used efficiently.
- Always seek to meet or surpass relevant environmental legislation and regulatory controls.
- Continually improve processes to minimise consumption of natural resources and energy and seek to add value wherever possible.



### UN Global Compact

We are a proud signatory to the UN Global Compact and support the furtherance of the UN Sustainable Development Goals. In May 2021, we delivered our first UN Global Compact communication on progress. There, we outlined how, through the resilience and commitment of our people and a focus on our mission to contribute to society through education, we were able to continue to serve learners around the world and look after our teams in the midst of a global pandemic.

We are dedicated to helping learners and our colleagues demonstrate and achieve their potential, and throughout the pandemic, we truly have seen our purpose in action. Whether it was supporting schools to move to remote learning, innovating across our products so we could provide young people with the tools to progress with their lives, or supporting our global colleagues with their mental health, our focus on acting responsibly, collaborating to succeed, and innovating as an organisation has carried us through. Find more on our Global Compact work on our [website](#).



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Cambridge University Press & Assessment unlocks the potential of millions of people worldwide. Our qualifications, assessments, academic publications and original research spread knowledge, spark enquiry and aid understanding.