



Cancer Research UK's Code of Conduct



Together we are
beating cancer

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Message from our Chief Executive, Michelle Mitchell OBE



We want to bring about a world where everybody lives longer, better lives, free from the fear of cancer. Over the past 120 years, we've made discoveries that have saved countless lives and benefited millions around the world each year. But beating cancer is a long game and for us to make the progress we need, everyone must make the right long-term decisions for the charity.

To make sure we can deliver the greatest impact for people affected by cancer, it's essential we all take responsibility for protecting Cancer Research UK's reputation. We need to make sure that cancer patients, our supporters, volunteers and everyone who works with us can continue to place their trust in us. Our supporters work tirelessly to raise money and we all have a desire and a duty to make sure we spend it in the best, most impactful way. That means we must all do the right thing every day, making ethical choices and living our organisational values.

Our Code of Conduct is the framework to guide us all in our day-to-day actions and decisions, giving us all a constant set of standards and decision-making tools to help us act in the best interests of the charity. Our Code of Conduct is important and failure to comply may result in disciplinary action – up to and including dismissal.

Our code is for everyone and it's here to help guide us all as we play our parts in beating cancer.

Our purpose and strategy

Cancer Research UK exists to beat cancer. For the past 120 years, we've been making discoveries that have saved countless lives, and which benefit millions of people around the world each year. But we need to go further, faster.

Our organisational strategy sets the path to achieving our vision of a world where everybody lives longer, better lives, free from the fear of cancer. Our strategy is made up of five key objectives:



Discover

We make discoveries about cancer that unlock new and better ways to beat it

Translate

We drive scientific discoveries forward into interventions that benefit everyone

Engage

We inspire millions to join with us in our mission

Partner

We partner with other organisations to have the biggest possible impact

Sustain

We build the foundations for sustainable long-term progress against cancer

Our strategy outlines the actions we'll take to achieve our vision.

Our values and behaviours

Our organisational values and leadership behaviours underpin our Code of Conduct and guide how we all work and behave every day. They're central to who we are.



Bold

Act with ambition, courage and determination



Human

Act to have a positive impact on people



Credible

Act with rigour and professionalism



Together

Act inclusively and collaboratively

We're all different, but we all share the same organisational values, no matter what role we play in the charity.



For those who are in a leadership role, we have leadership behaviours to help guide how you work:

Our leaders aim high, create clarity and act decisively

It requires us to...

Clear the path; by navigating ambiguity, focussing on what's important and making clear and timely decisions

Stretch the ambition; by being bold, creating momentum (no matter the time horizons) and balancing short and long term performance

Our leaders create an environment where people can do impactful work

It requires us to...

Enable ownership; by valuing and growing exceptional people, giving space for expertise and potential to shine then knowing when to step in and when to get out of the way

Build an inclusive environment; by bringing together diverse teams where individuals feel valued and value each other

Our leaders embrace our mission as a collective effort

It requires us to...

Work generously; by assuming positive intent in others and giving time, knowledge and expertise in a transparent, collaborative spirit

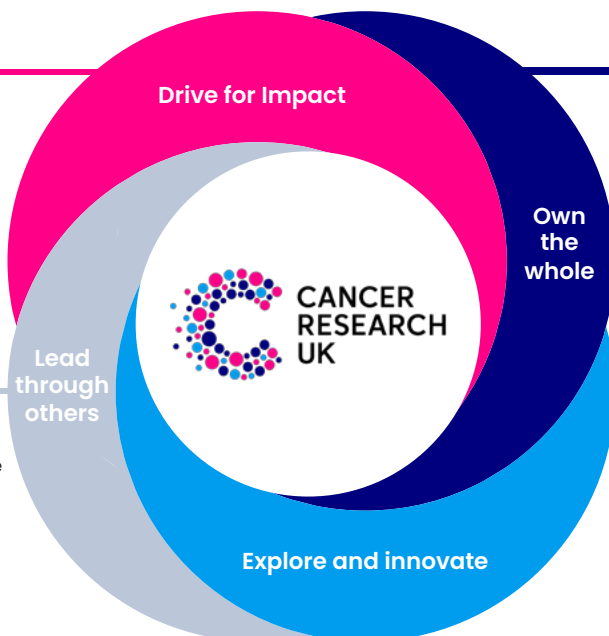
Connect to our cause; by being owners and promoters of our strategy, anchoring it in our day to day work and telling stories of the impact we are having

Our leaders foster the conditions where ideas and fresh approaches thrive

It requires us to...

Get curious; by questioning openly, habitually looking beyond the boundaries of our expertise, team and organisation

Value challenge and ideas; by encouraging different perspectives, spotting and nurturing fresh ideas and learning from experimentation



Our Code of Conduct is for everyone

Our Code of Conduct is for everyone, and we're all responsible for behaving ethically and with integrity.

Whether you're a permanent, fixed term or temporary colleague, employed by us (Cancer Research UK or Cancer Research Horizons) or engaged as an external secondee, contractor or agency worker, you will be guided by our Code of Conduct and organisational values.

Cancer Research UK is bigger than those we employ and that's why we also ask our Trustees, volunteers and those who represent the charity in any official capacity (eg the chairs of our funding committees), to commit to our Code of Conduct.

- Our line managers play an important role by setting a good example, contributing to an ethical culture, speaking up when things aren't right and making sure that anyone who speaks up in good faith doesn't experience retaliation.
- Our leaders have a further role to play by living our Code of Conduct and leading by example every day. Our Executive Board sets the tone for the charity and, along with the wider Directors Leadership team, role models our Code of Conduct and the leadership behaviours.
- Our Council, made up of our Trustees, has oversight of the governance of the charity and set our risk appetite. They also hold our leaders to account for their conduct and behaviour in line with our Code of Conduct and our values.



How we all work – our policy framework

We believe everyone wants to do their best for the charity. To help you do that, we have tools to guide how we all work and help you make the right decisions. Keeping to our guidelines is essential to preserving our reputation and maintaining our integrity.

We're all responsible for understanding and familiarising ourselves with the guidelines that are relevant to us as individuals, whether that's through induction (your own or your colleagues), taking part in mandatory learning, or raising concerns if you experience people acting outside of our guidelines.

- Our **Code of Conduct** outlines our shared values and helps you to understand your role in making the right decisions for the charity and acting with integrity. Our Code of Conduct is supported by a range of resources and tools that together guide how we all work as a charity. We can't cover every situation you'll come across, but our Code of Conduct is the foundation that guides how you should work and make ethical decisions.
- Our **Code of Ethics** serves as a guide for how to approach making difficult decisions and sets out how we're all expected to conduct ourselves at work. It defines how you must act to make sure you maintain our reputation and uphold our values. Following our Code of Ethics will make sure we are beating cancer together.
- Our **Key Policies** outline standards and behaviours that everyone must understand and meet. They focus on the areas that are most important for the integrity of the charity. Complying with these policies is crucial to protect our reputation and our people. A breach of a key policy could lead to a serious incident with the potential to harm your colleagues and those you work with and/or negatively impact our brand or reputation externally.
- Our **CRUK Requirements** outline clear and structured subject-specific 'must dos' that everyone must understand and work to. They include required action or standards, some of which are underpinned by law. For example, this includes many of our HR and people 'must dos'.

Any action that breaches one of our Key Policies or CRUK Requirements is serious and could result in disciplinary action, up to and including dismissal. It's important you're familiar with the policies and CRUK Requirements so that you can always act with integrity.

- Our **Guidance** outlines other information or instructions in a range of ways (such as flow charts, case studies or checklists) to help bring our Key Policies and CRUK Requirements to life. It helps us all work effectively and outlines good practice for us all to follow. Whilst our Guidance isn't mandatory, you should aim to work in this way as it provides consistency and delivers effectiveness. You should have good reason for acting outside of our organisational guidance.
- Our **Ethical Decision-making Framework** outlines some key questions we should all ask ourselves when making a decision that isn't straightforward or governed by our Key Policies, CRUK Requirements, or Guidance. These simple questions help you to consider the impact of a decision or action, with a focus on our vision, supporters and colleagues.

Our Key Policies

It's important we're all familiar with our Key Policies. They outline the standards and behaviours expected of everyone and focus on the areas most important for the integrity of the charity.

Our reputation

'Our brand is trusted and respected'

Tobacco Policy

We commit to understanding our responsibilities regarding our position on tobacco, including how we avoid links with the tobacco industry. This is so we can work in a way that's consistent with our mission of beating cancer.

Tobacco remains the biggest cause of cancer in the UK and causes over a quarter of all UK cancer deaths, including over 8 in 10 cases of lung cancer. Smoking also increases the risk of developing at least 14 other cancers. There's no safe way to use tobacco, so we oppose the promotion and sale of tobacco in all its forms.

Our people have the right to work and volunteer in a smoke-free environment. We also must all make sure we don't damage our reputation and political legitimacy from any inappropriate association with the tobacco industry.

Fundraising Responsibly Policy

One of our strategic objectives is to create a step change in our fundraising, so we can increase the funding available to beat cancer. To achieve this, it's critical that all our fundraising practices and activities are managed compliantly and to the standards expected of us.

If our fundraising activities are legal and compliant, we'll maintain our good reputation and retain the trust of, and deliver a positive experience for, the public, our supporters and colleagues. This policy helps us all make sure our fundraising meets our internal CRUK Requirements and applicable laws, regulations and sector-specific standards, particularly Charity Commission guidance.

Social media – Protecting Our Brand Policy

How we speak about Cancer Research UK, cancer or other issues while representing the charity or being seen to represent the charity, can impact on our individual and collective reputation. This could be on social media, or in person when wearing Cancer Research UK lanyards or speaking about our role.

We need to make sure safeguards are in place so that we represent Cancer Research UK in a way that is responsible and protects our reputation.

The purpose of this policy is to minimise the risks to Cancer Research UK through use of all forms of social media, including all social networking sites, internet postings and blogs. It applies to the use of social media for business purposes, as well as personal use that may affect Cancer Research UK in any way.

Our People and Places

‘Our working environment is safe and healthy, and enables everyone to be themselves’.

Dignity at Work Policy

We want everyone at Cancer Research UK to be treated with dignity and respect, so that we can all work in a comfortable and safe environment where bullying, harassment and discrimination are not tolerated. We all have a responsibility to make sure our working environment is safe for everyone.

This policy lays out the standards of behaviour we need to uphold to make sure everyone at Cancer Research UK is treated with dignity and respect. It also explains what support is available if you believe you’re being bullied, harassed or discriminated against, and what to do if you witness behaviour that you believe constitutes bullying, harassment or discrimination.

Equality, Diversity and Inclusion Policy

Beating cancer means beating it for everyone. We know that diverse teams can be more innovative and productive and will give us the best chance of achieving this mission. We want everyone at Cancer Research UK to feel part of an inclusive team, where our differences are valued, we have fair and equal opportunities to succeed and everyone can thrive.

We will continue to take action to create an inclusive and diverse environment for everyone at Cancer Research UK and uphold the standards of behaviour needed to do this. We all have a responsibility to follow the practices, policies and procedures that have been put in place to ensure fair and inclusive treatment for everyone. These include how we manage recruitment, performance management and career development.

Safeguarding Policy

To maintain the confidence and trust of our supporters, beneficiaries, the public and each other, we need to be aware of our safeguarding responsibilities. The purpose of this policy is to outline how we fulfil our safeguarding responsibility to protect children, young people and adults at risk of abuse or harm, when they come into contact with Cancer Research UK.

We take abuse or harm concerns seriously and adherence to this policy is critical. We all need to understand our role in helping minimise the risks of any harm and abuse, and have confidence in how any concerns we raise will be dealt with.

Safeguarding is not only about protecting but also about preventing abuse and harm from occurring.

Safety, Health and Welfare Policy

The safety, health and welfare of our people is critical to the long-term success of Cancer Research UK. We’re committed to ensuring the health and safety of our employees and anyone affected by our activities, and we take all reasonable and practical steps to provide and maintain a safe and suitable environment for all those attending our premises. We also aim to put suitable management arrangements and procedures in place to make sure our people and volunteers are aware of their own safety obligations.

Our Resources

‘Our funds, tools and resources are used wisely and responsibly’.

Acceptable Use of Resources Policy

We aim to give all our people the tools, equipment, resources and information to successfully perform their roles, as well as a safe and secure environment to work in.

The charity has a duty to protect its information and property and to comply with its legal, regulatory and contractual requirements. We also wish to use our resources responsibly and prudently, to maintain the confidence and trust of our supporters, each other and the public.

This policy sets out in legal and practical terms how it's people should use and operate equipment, tools and resources provided to them by the charity and to signpost requirements and guidance to ensure that neither individual nor Cancer Research UK contravene any legal requirements.

Information Security and Data Protection Policy

The protection of information and data is critical to the long-term success of Cancer Research UK and our group companies. We commit to safeguarding our data to help protect people's information, privacy and human rights, ensuring the availability, integrity and confidentiality of our systems and networks. This includes business information which enables us to operate effectively, information for which we have Intellectual Property Rights and the personal data entrusted to us by supporters, colleagues, researchers and other partners.

This policy sets out the framework for how we do this, meeting legal requirements and protecting our organisation's resources. This includes determining the controls (people, process and technology) which make sure information, data and systems are protected.



Our CRUK Requirements

It's important we all understand the specific 'must dos' that exist outside of our Key Policies. Many of these are underpinned by law and impact how our people work day-to-day.

Our CRUK Requirements are grouped under the same three pillars, to which our Key Policies also belong; Our Reputation, Our People and Places, and our Resources.

Our CRUK Requirements can be found by CRUK colleagues on our internal Policy Framework SharePoint site.

Making the best decision for the charity – our Ethical Decision-making Framework

We can't provide Key Policies, CRUK Requirements or Guidance that cover every situation we might come across. To help you navigate times where there isn't clear guidance for what you should do, we have an Ethical Decision-making Framework to help us all make the best decisions we can. This includes situations where you must make difficult decisions and there may not be a clear right answer.

1

In these circumstances, you should:

- Clarify the facts and the context.
- Consider the different stakeholders and the impact of action(s) on them.
- Consider a range of options and alternatives.

2

You should then ask yourself:

- Is this in line with our vision and mission?
- Is this in line with our values and leadership behaviours (if applicable)?
- Is this sustainable?
- Am I comfortable with any ethical consequences of this action?
- Would I be happy explaining this to our supporters?
- Would I be happy if this happened to me?
- Would it be ok if everyone did this?

3

Yes:

If you answer 'yes' to all the questions above then move ahead, making sure you follow our Key Policies, CRUK Requirements and Guidance

No:

If you answer 'no' to any of the questions above, stop and revisit the issue in discussion with your manager and colleagues before you act.

Not sure:

Get some different perspectives from your manager and colleagues before agreeing the best way forward.

4

Following the standard rules and processes will nearly always create the right result, but there are exceptions to this. If you feel that following a rule or process would result in a poor outcome, or could be damaging to the charity, you should discuss the best way forward with your line manager.

Always talk to colleagues. When making difficult decisions, speak to your manager and other colleagues to get a range of perspectives before making a decision.

Speaking up

We all have a part to play by speaking up and reporting our concerns.

We want everyone at Cancer Research UK to speak up when things don't feel right. If you see or experience any wrongdoing, or something that doesn't feel right, it's really important that you speak up (provided you feel comfortable doing so). This will make sure the situation is dealt with and action is taken to stop it happening again. It also means you can get any support you need.

The first port of call for your concerns is to talk them through with your line manager, who can listen and advise on next steps. For day-to-day issues, try to resolve them informally in the first instance. If you don't feel comfortable resolving the issue informally or speaking to your line manager for any reason, there are other channels

you can use to report and escalate serious concerns without delay.

There may be situations where another colleague, or the charity, make a decision that doesn't sit comfortably with you based on your personal views or values. In those cases, it's still important to speak up so that your manager can work through your concerns with you and make sure you understand the reason for the decision, even if you might have made a different call.

To make sure the concern you want to raise is dealt with in the fastest and most appropriate way, please use the route below which applies to your particular issue.

Working conditions or your employment

- You're encouraged to speak openly and honestly to your manager about any concerns you have, as most issues can be resolved informally through a good conversation.
- You can also contact HR for advice, at hrservicecentre@cancer.org.uk, where concerns will be dealt with confidentially and informal and formal routes available can be explained. More information is also available in our CRUK Requirements.
- Our staff representatives are trained and independent colleagues who can give confidential guidance and support on a range of issues.

Bullying, harassment, dignity at work, equality, diversity, and inclusion

- If you have concerns you or someone else is not being treated with dignity at work, or is a victim of any of the unacceptable behaviours outlined in our EDI and Dignity at Work policies, you can contact the inclusion and wellbeing team for support at inclusionandwellbeing@cancer.org.uk.
- All the channels outlined above in the working conditions or your employment section also apply.



Speaking up

Safeguarding

- In the case of an emergency or immediate danger, call 999.
- Raise all safeguarding concerns (including those reported to the emergency services in the first instance) with the safeguarding team at safeguarding@cancer.org.uk.

Key policy non-compliance

- If you have any concerns relating to non-compliance with our Key Policies, or regulatory non-compliance which is relevant to a specific key policy, see the contacts listed in the individual policy or contact the Policy Sponsor.

Breach of law or regulation

- If you're aware of fraudulent behaviour, illegal acts, breach of regulations, unethical conduct, conflicts of interest or malpractice, you are strongly encouraged to contact the confidential and external whistleblowing line on 0800 069 8398.

Reporting concerns anonymously

- We encourage all our people to speak up using the routes above, to make sure concerns are handled by the most appropriate team and using the most relevant process.
- But we recognise sometimes colleagues may have concerns they want to share, but don't feel comfortable doing so.
- If that's the case, you can use the whistleblowing hotline detailed above, which is designed to handle a breach of law or regulation.
- Using this route for other issues may limit how concerns are investigated or action taken, based on the information available, but all concerns will be explored as far as possible and taken seriously.

As well as the routes available to speak up, you can also get support via:

- the Employee Assistance Programme, who you can reach on 0800 389 0285, on their website healthassuredeap.co.uk or via the Health e-Hub app.
- Mental Health First Aiders, who can be contacted for support for anyone experiencing mental health issues.

Speaking up

Everyone should:

- feel comfortable speaking up and listen to anyone else speaking up in good faith.
- understand the channels available and use the right one to escalate concerns.
- constructively address behaviours and actions that don't meet our standards.
- try to resolve day-to-day issues and concerns informally.
- escalate serious concerns without delay.
- make sure concerns are properly addressed.
- respect confidentiality and the right to anonymity.

We should never:

- ignore behaviours and actions that don't meet our standards.
- tolerate retaliation or criticism of anyone who speaks up and raises a concern.



Our role as a grant funder

We recognise our impact goes beyond the people who work directly for us and that we have an important role to play in the scientific community as a major funder of cancer research globally.

To make sure we're playing a responsible role in the wider research community, we have detailed policies that apply to the organisations and institutions we fund, and the scientists employed under our grants. These are outlined on our website and include some of the following key areas:

- **Research activity:** use of animals in research, recruitment of human trial participants, clinical trials.
- **Researchers:** salaries, flexible research careers, dignity at work in research.
- **Publication:** open access publication.
- **Reputation:** research integrity and conduct, tobacco funding.

If you're a scientist or host institution applying for, or in receipt of, Cancer Research UK funding, you can speak to the Research Funding Manager for your grant for more information.



Our role as a fundraiser

We couldn't carry out our life-saving research without the generosity of our donors, volunteers and supporters who make our work possible.

Every day and in all that we do, we must keep our supporters front of mind. We all have a duty to make sure the money they raise is spent carefully, wisely and in the best way possible to achieve our mission. As a key part of our charity, we also ask our volunteers to uphold the standards in our code. We must all be able to demonstrate value for money in every pound we spend.

Our donors and volunteers go to great lengths to help us fundraise and the money they raise is often their way of honouring the lives of lost loved ones. We must all respect their contribution and their generosity, thinking of them in all that we do.

This is also an important part of protecting Cancer Research UK's reputation and making sure that everyone who works with us can continue to place their trust in us. That means we must all do the right thing every day, making ethical choices and living our organisational values.



Code of Conduct

sponsorship, assurance and reviews

Code of Conduct sponsor	Chief Operating Officer The Sponsor has ultimate executive accountability for the content and operation of this code and will coordinate the activity of the business contacts who together manage the day-to-day aspects of this code and its operation.
Policy assurance	The Sponsor will: <ul style="list-style-type: none">• make sure this code is reviewed regularly and updated to align with external or internal developments and reflect current best practice.• in collaboration with other colleagues, ensure appropriate levels of awareness and understanding of this code.• put in place the controls and operational metrics needed to provide appropriate assurance that the code is operating effectively. This may include formal audits, compliance checks, regular surveys of staff knowledge, or monitoring of training completion.
Executive Board or Council approval	This code will be reviewed triennially by our Executive Board and the Council, on the recommendation of the Operational Risk Committee (ORC). A proposal from the Sponsor to make any material amendment to the policy will trigger an early review.
Date of last review	November 2023
Next review due	November 2026