



# Principles of Good Governance at Tampere University

# Contents

## Foreword

1. Responsible conduct of research
2. Ethical principles of teaching and learning
3. Sustainable development and responsibility
4. Principles of staff recruitment
5. Equality and non-discrimination
6. Safety in the workplace
7. Data management and knowledge-based management
8. Data protection and information security
9. Public and confidential information
10. Assessing the impact of changes
11. Conflicts of interest and secondary employment
12. Presentation procedure
13. Participation in preparatory processes and decision-making
14. Contract policy
15. Procurements
16. Export controls and sanctions
17. Reporting suspected misconduct



# Foreword

Tampere University Foundation, which operates as Tampere University, has a mission to promote independent academic research as well as academic and artistic education, to provide research-based higher education and to educate students to serve their country and humanity at large. Our purpose is to work together to build a sustainable world. In all our activities, we adhere to the ethical principles of world-class university operations, the principles of good governance and to our values, which are courage, critical thinking, diversity, erudition, learner-centredness, openness and responsibility.

To ensure good governance and facilitate everyday work across our new multidisciplinary University, it has been necessary to compile our operational principles and best practices into a single document called Principles of Good Governance. I want to extend my sincere thanks to all those who participated in the process and hope the principles become widely known both within our community and among our key stakeholders.

Mari Walls

President

# 1 Responsible conduct of research

*Adherence to the principles for the responsible conduct of research enables University staff to carry out research that meets high ethical standards and provides reliable results. The principles promote the occupational well-being of University staff and their respectful and fair treatment. Tampere Universities are committed to complying with the guidelines issued by the Finnish National Board on Research Integrity (TENK) for the responsible conduct of research and procedures for handling allegations of misconduct.*



## **We are committed to undertaking research in accordance with the principles of research integrity and ethics**

Adherence to the guidelines for the responsible conduct of research (RCR guidelines) is part of our academic community's self-regulation and our quality management system as a research institution. Not only our individual researchers and research groups but also the University and our scientific community as a whole have a duty to comply with the RCR guidelines.

When research involving human subjects is carried out, we follow the ethical principles and the guidelines for ethical review drawn up by the Finnish National Board on Research Integrity (TENK).

Besides research, we take steps to ensure the RCR guidelines are followed when preparing teaching materials, social media posts, CVs, lists of publications, and other written and spoken materials.



## **We address violations of the responsible conduct of research**

Tampere University does not condone any form of unethical or dishonest conduct that damages the legitimacy of the scientific enterprise. As such conduct may potentially violate fundamental or human rights, we investigate cases of suspected academic misconduct in accordance with the national procedure adopted by all the higher education institutions in Finland. Researchers must adhere to the RCR guidelines despite being in a hurry or under pressure to publish their findings.

Violations are divided into research misconduct and disregard for the responsible conduct of research. Research misconduct is further divided into fabrication, falsification (misrepresentation), plagiarism, and misappropriation. Disregard for the responsible conduct of research occurs, for example, when a researcher fails to give appropriate credit to other researches or reports on research results or methods carelessly or misleadingly.



## We are committed to the freedom of science and open scientific debate

There is room for scientific debate and discussion in our community. A scientific dispute does not constitute a violation of the principles for the responsible conduct of research. Critical debate is an integral part of scientific discussion as long as it is constructive and substantiated. Researchers are not expected to be infallible under the principles for the responsible conduct of research.

Honesty, due diligence and thoroughness throughout the research process	Ethically sound data collection, research and assessment methods	Openness and responsible communication of research findings
Acknowledging the work of other researchers (for example, when citing and referencing)	Planning and conducting research in compliance with scientific research standards	Obtaining the necessary permissions for research
Conducting an ethical review before initiating research studies where such a review is required	Agreeing on the rights, authorship, responsibilities and obligations a research group or members thereof and on access to and use of research data	Disclosing relevant outside commitments and conflicts of interest to the parties concerned and when publishing research results
Withdrawing from an assessment or decision-making where a researcher believes a conflict of interest to exist	Adhering to best practices in HR and financial management	Putting in place appropriate safeguards to protect personal data

*Principles for the responsible conduct of research*

## 2 Ethical principles of teaching and learning

*At Tampere University, we engage in ethical reflection and are committed to the pursuit of ethically sound activities and thereby encourage and enable our graduates to contribute to building a better society and a better world. In the context of teaching and learning and other activities carried out by university graduates, a special emphasis is placed on a sense of responsibility and the possibility to make ethically conscious decisions and choices and consider the implications and consequences of one's actions and decisions.*



## **We take ethical considerations into account in everyday teaching practice**

While teachers' rights and responsibilities are set out in law, ethical questions cannot be considered from a purely legal perspective. Teachers have a duty to comply with legal requirements but law cannot replace ethical reflection. The ethical questions that teachers must consider are, for example, related to equality, human dignity, truthfulness, fairness and sustainable development. Doing good and avoiding harm are the fundamental principles of ethical behaviour. The code of ethics for teachers governs teachers' relationships with learners, colleagues, the broader society and external stakeholders and their attitudes towards their work and the plurality of values.

Teachers have a responsibility to support and promote students' learning and growth not only by using various teaching methods to effectively instruct students with different learning needs but also by providing feedback that enhances their motivation to learn. All teachers are expected to provide advice and guidance to their students. All students must be treated equally and respectfully without fear of discrimination.







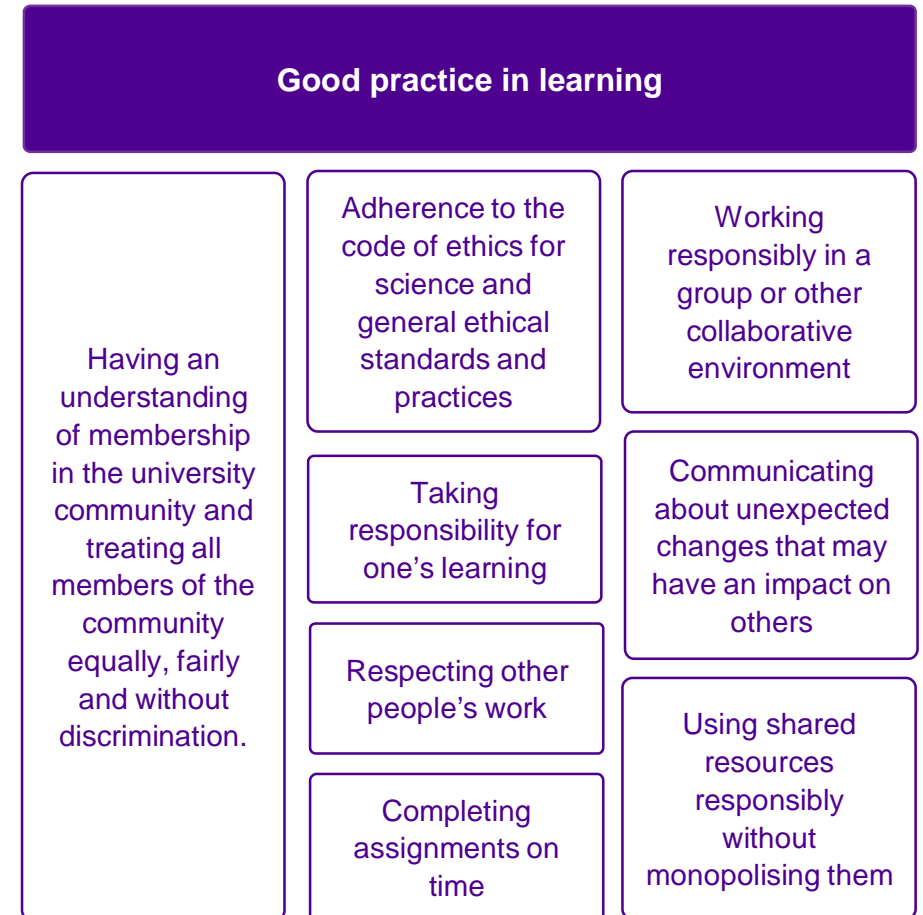
## Raising awareness of good practice in learning continues throughout one's time at university

In the context of teaching and learning, we comply with the principles for the responsible conduct of research and good practice in learning as well as the ethical guidelines issued by the Finnish National Board on Research Integrity (TENK) for learning, research and scientific integrity. We place a special emphasis on the importance of teaching and learning about the good practice in learning and the principles for the responsible conduct of research. Acquiring content knowledge and gaining an understanding of professional ethics and the ability to assess them critically is a part of working towards a university degree.

Students learn to develop the knowledge, skills and attitudes that they need to make effective academic progress, complete their degree and ultimately make a successful transition to the world and seek further professional growth. One of the key goals of university education is to become an effective learner and an academic professional with the ability to address complex challenges through research and scientific inquiry.

When developing curricula, we make sure that students are able to gradually expand their knowledge of research ethics and the responsible conduct of research while completing their course of study as required by the Government Decree on University Degrees and Professional Specialisation Programmes. In addition, our curricula are designed to make students aware of principles of good practice in learning and the responsible conduct of research adopted by Tampere Universities which must be mastered by all students graduating from Tampere Universities. We continuously assess and develop our programmes to ensure our students acquire sufficient knowledge, skills and attitudes to be able to comply with the principles of good practice and ethical standards while working towards their degree and after graduation.

## Ethical principles of teaching and learning



# 3 Sustainable development and responsibility

*As set out in Tampere University's strategy, we have made it our mission to work together to build a sustainable world. We develop solutions to tackle climate change, protect the natural environment and improve the well-being and sustainability of societies. Sustainable development and the different dimensions thereof are an integral part of all our activities.*

*One of our core values is responsibility, which shows in our research and teaching, university-wide policies and practices and our societal impact. We are a pioneer of sustainable development.*



## **Efforts to promote sustainable development and responsibility are integrated into our activities**

Our commitment to sustainable development shows in the learning outcomes that all students graduating from Tampere Universities are expected to attain by the end of their programme of study. To ensure that students are able to build expertise on sustainable development themes, we have created a study module made up of multiple courses. All students at Tampere Universities have the option to complete either the entire module or individual courses and have them count towards their degree. Sustainable development goals are also considered when planning and developing teaching and instruction. We are working to integrate sustainable development perspectives into teaching and offer sustainable development training to all our staff.

Research relating to all the United Nations Sustainable Development Goals (SDGs) is carried out at Tampere University. We strive to ensure that all our researchers maintain networks and other collaborations that enable them to share and receive information about sustainable development research and related themes. Our goal is to integrate sustainable development into all our research.

As set out in the University's strategy, we maintain close ties with external stakeholders and the broader society and are committed to delivering impact for society. We also expect our partners to adhere to the sustainable development principles and promote sustainable development in their own activities. In addition, our efforts and collaborations that aim to make a positive impact on society are focused on areas where we can maximise progress towards sustainability and responsibility.



## **We use and develop our campuses in accordance with sustainable development principles**

We are working to calculate and reduce our carbon footprint and have pledged to become carbon neutral by 2030. We also have multiple projects underway to increase our carbon handprint, or the positive environmental impact of our activities. Our efforts to promote sustainability across the Tampere Universities community cover not only on-campus activities but also our procurement policies and guidelines for travelling between campuses and on business. In addition, we are working to improve physical and digital accessibility, improve well-being among our staff and students and promote equality and non-discrimination as part of our efforts to foster a culture of sustainability and responsibility across the Tampere Universities community.



# 4 Principles of staff recruitment

*As set out in the strategy of Tampere University, we recruit, support and develop future game-changers. Successful recruitments improve the level of scientific and societal expertise within our community and help us build a positive employer image.*

*Recruitment procedures must be transparent and consistent with the principles of equality, fairness and non-discrimination. As a rule, all our vacancies are openly advertised. We encourage international recruitment.*



## **Recruitment is based on strategic HR planning**

HR planning activities are strategically managed across the University to ensure they reflect our core values and goals, have a long-term focus and are responsible and sustainable. New employees are primarily recruited in accordance with the HR plan which is incorporated into the annual operational and financial plan. Other recruitment processes may not be initiated without the employer's formal authorisation. If necessary, a separate committee may be established to make preparations for filling a vacancy.



## **Our recruitment practices are open, responsible and non-discriminatory**

Applications for open positions are invited through the University's online recruitment system. All candidates must be treated fairly, and the principles of equality and non-discrimination must be observed when making hiring decisions. The University Regulations set out the general principles that govern recruitment procedures and outline the competency requirements.

When candidates are evaluated, the appropriate evaluation methods will be selected on a case-by-case basis and may include, for example, expert reviews, interviews, research presentations, video interviews, aptitude tests and assessments of teaching competence. Candidates' teaching skills will be evaluated when they apply for teaching-oriented positions or, if necessary, other positions. When considering candidates for a research position, we take into the account the nationwide recommendations for the responsible evaluation of researchers. The general principles for evaluating researchers are transparency, integrity, equity, competence and diversity. We are committed to improving researchers' working conditions, career development and recruitment practices and enhancing the environment for researchers as set out in the Human Resources Strategy for Researchers (HRS4R). Tampere University has received the HR Excellence in Research award from the European Commission in recognition of our continued efforts to improve the working conditions and career development for research staff and provide them with a stimulating, functional and equitable environment in which to carry out research.



## The University uses a tenure track career system

The tenure track career system supports and promotes the quality and impact of research and education at Tampere University. Open tenure track positions are internationally advertised, and we hire the strongest candidate who demonstrates the potential to achieve full professor status and international distinction in his or her field. The University is committed to providing tenure track staff with sufficient resources for their research and supporting them on their path towards a professorship. We support and monitor the achievement of mutually agreed written goals throughout the tenure track career.



# 5 Equality and non-discrimination

Tampere University aims to promote equality and non-discrimination in society as a whole. We take the principles of equality and non-discrimination into account throughout our decision-making processes from gathering information to making and implementing decisions.





## Our guiding principle is equality

The Finnish Constitution prohibits discrimination on the basis of, among other things, gender, age, opinions, disability or other personal reasons. As an employer, the University has a duty to treat all employees equally, unless deviating from this principle is justified considering employees' tasks and position in the organisation.

Our Equality and Non-discrimination Policy sets out both HR-related and functional goals for promoting equality and non-discrimination across Tampere University as a workplace and an educational establishment. To achieve the goals, we must integrate activities designed to promote equality, non-discrimination and digital and physical accessibility into every facet of our daily activities.

As an employer, the University is committed to developing staff members' working conditions and the procedures for recruiting new staff and making decisions that affect staff.

**Effective leadership** supports the members of our university community as they work towards our strategic goals. The goal of leadership is to ensure all staff members feel that they are treated fairly, feel valued and appreciate the work of others.

**Our employees** are our greatest asset. As an employer, the University provides all staff with equal opportunities for career advancement and an equitable work environment.

**Education and learning:** The University promotes equal access to education and ensures that, for example, student admissions, teaching arrangements and student assessment practices are in line with the principles of equality and non-discrimination. We offer our students the opportunity to take part in the activities of the university community.

**Research:** We support the career development of researchers in accordance with the principles of equality and non-discrimination. Our goal is to ensure that all staff who carry out research have equal opportunities for career advancement and/or career development their careers and that all our researchers teach and all our teachers conduct research.



## **We address inappropriate conduct, harassment and bullying**

We address harassment, bullying and other forms of inappropriate behaviour as early as possible. No member of our university community may engage in conduct that endangers the health or safety of others. All the members of our university community have a duty to address inappropriate conduct.

Staff members have the right to be accompanied by a harassment contact, occupational safety representative, trade union representative or other support person when their matter is to be discussed. Students are likewise entitled to be accompanied by a support person, such as the student union's designated harassment contact.



## **We work together as a community**

The University has an Equal Opportunities Committee appointed by the President. The members represent different staff groups and the student population. When potential candidates are considered for membership in the Equal Opportunities Committee, their specialist expertise and/or experience in promoting equality, non-discrimination, physical accessibility and digital accessibility will be taken into account. The Equal Opportunities Committee is tasked with monitoring and assessing the achievement of goals set out in the University's Equality and Non-discrimination Policy.

The University's Cooperation Council, comprising both employer and employee representatives, discusses questions that fall into the scope of the Finnish Act on Cooperation within Undertakings, such as recruitment principles and practices, HR plans, staff training plans and the principles and practices of internal communications.

# 6 Safety in the workplace

*The University engages in health and safety activities to provide all staff, students and the campus community with a safe environment for working and studying. Supervisors must set an example by strictly following the safety procedures and protocols and promoting a safety-conscious culture. Teaching staff are responsible for the safety of students in their classroom. Students are educated about safe working practices.*



## **We are committed to creating a safe environment for all the members of the campus community**

Tampere Universities are committed to providing all the members of the community with a safe environment for working and learning. The members of our community have the right to study and work in an environment that is safe and equal from physical, psychological and digital perspectives. Our Safety Charter sets out our safety goals and provides a solid foundation for fostering a safe campus environment.

As stated in the Safety Charter, we take responsibility for safety and make safety a priority in everything we do. Fostering a safe campus environment is a collaborative effort involving all the members of our community. We communicate about safety and encourage open discussion across the community. We support or competent people and improve well-being within our community with the help of good leadership and effective daily workflows and by fostering a sense of community.



## **We work together safely and responsibly**

Supervisors serve as employer representatives and have a duty to maintain the health and safety of their staff in the workplace. All the members of our community are entitled and obligated to help maintain a safe campus.

We ensure that new employees are provided with orientation and that the members of our community know how to perform their tasks safely and minimise any risks. The occupational health and safety team assists staff with questions about safe working practices and a safe working environment.

We monitor health and safety in the workplace on a regular basis by assessing potential risks, hazards and stressors and by conducting workplace surveys in cooperation with the provider of occupational healthcare services.

Bullying and all forms of harassment and inappropriate behaviour are strictly prohibited. We have an early support model that helps supervisors raise difficult issues and a procedure for responding to possible problems with an employee's ability to work.

# 7 Data management and knowledge-based management

*Documents, records and information systems are valuable sources of information and serve as written evidence of the activities undertaken at Tampere University. Without documented information, Tampere University and the achievements of the members of the university community would not exist to future generation, collaboration partners or even to ourselves. Lack of data and documentation would also pose a severe risk to the continuation of the University's activities and could lead to violations of the due process of law. It is therefore important that we manage information in compliance with shared and transparent principles and legal requirements to ensure that valuable data and information remain accessible to the entire university community now and in the future.*

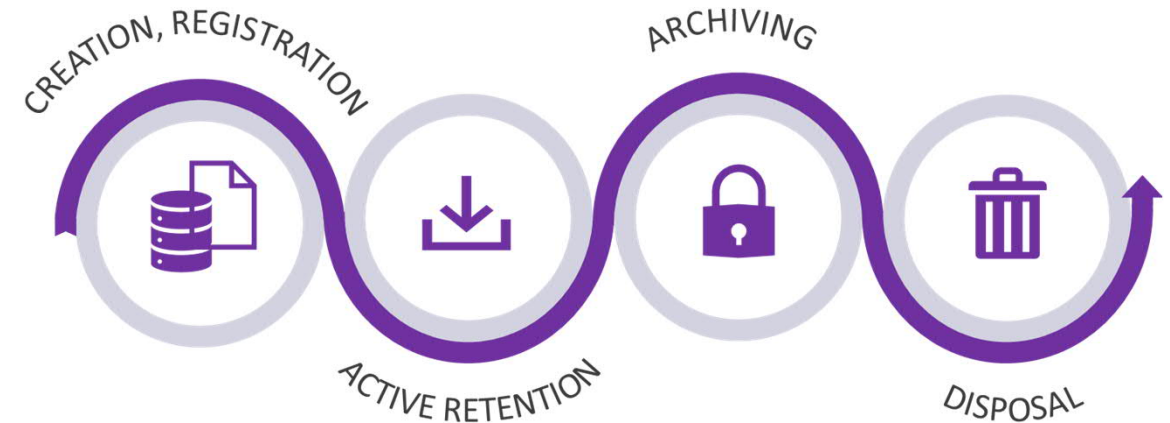


## Knowledge is one of our most valuable assets

We manage our operations and make decisions based on analysed and reliable information. We make sure that we have effective processes in place for generating information and enabling its further use so we can provide a solid foundation for high-quality research and teaching and good governance.

From the perspective of information management, the University has the status of a public authority as an information management unit. Together we ensure that the processes for managing administrative tasks, documents and other information are transparent, consistent across the University and meet the requirements of data protection and information security. We primarily retain documents and other records in an electronic format and keep them safely stored and retrievable.

Both the lack of information and insufficient information would pose a significant risk to the University's activities. As records are created and processed throughout the University, the entire university community has a duty to ensure that they are appropriately managed. All our employees have a duty to ensure that information is managed appropriately.





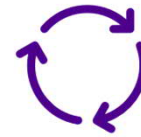
## **All the members of the university community have a duty to process documents appropriately**

We store documents that are created or processed in the course of our activities in the University's electronic records management system as soon as they are drawn up or received regardless of whether the original copy is in paper or electronic format.

The members of the university community are responsible for storing documents in the electronic system. Persons who take part in a given process are responsible for storing the documents that are created in the course of the process.

Documents are carefully stored in accordance with pre-defined principles and guidelines to ensure their (long-term) retention, retrievability and findability.

When documents are still in active use, they are stored in information systems that University staff can access when they need the information contained in the documents to perform their daily tasks. The careful and systematic retention of active documents ensures that they are easily and reliably available when we need them for work-related purposes.



## **We store valuable data in archives and securely destroy data we no longer need**

The University's most important records that must be retained for a long time or permanently are primarily archived in electronic format only in University-approved electronic archiving systems that ensure their long-term safe-keeping. Records may not be archived in non-approved systems. When processes are planned, documents are drawn up and electronic information systems are implemented, we consider the related record retention requirements and electronic archiving needs in advance.

Documents will be retained until their retention period expires. Electronic and paper records will be securely destroyed when their retention period expires. When external service providers take part in our processes and when we carry out projects or processes in collaboration with external partners, we have a duty to agree on the record retention and destruction policy and related responsibilities in writing with our partners.

# 8 Data protection and information security

*Data protection regulations govern when personal data can be processed and under what terms. Higher education institutions are hubs of knowledge, learning and research. Large amounts of data are continuously processed in connection with teaching, research and administrative activities. The majority of such data is personal data, which means any information that relates to an identified or identifiable individual.*

*Data protection regulations apply to all types of data. As a university community, we are committed to the secure and reliable processing of all types of data throughout their lifecycle.*





## We only process personal data that we need for a specified purpose

A large amount of data, much of it personal data related to an identified or identifiable person, is being continuously processed in the course of teaching, research and administrative activities at the University. Data protection is the process of protecting personal data. Data protection is a fundamental right and safeguards the rights and freedoms of data subjects when their personal data is processed. The processing of personal data must always be based on law.

All our employees have a duty to protect personal data. The processing of personal data is always planned and documented before starting processing activities or changing the manner of processing. When planning processing activities, we take into account the entire lifecycle of personal data and comply with the legal requirements. We process personal data in compliance with the University's Data Protection Policy and information security guidelines, such as the Information Security Policy.

We recognise that certain categories of personal data present a higher risk to the rights and freedoms of data subjects and therefore require heightened data protection measures. We use four levels to classify the personal data we process based on the level of risk and the required level of security.

**Lawfulness, fairness and transparency:** Personal data must be processed lawfully, fairly and in a transparent manner in relation to individuals.

**Purpose limitations:** Personal data may only be collected for specified, explicit and legitimate purposes and may not be further processed in a manner that is incompatible with those purposes.

**Data minimisation:** Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

**Accuracy:** Personal data must be accurate and, where necessary, kept up to date.

**Storage limitation:** Personal data must be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

**Integrity and confidentiality:** Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

**Data protection by design and default:** Data privacy features are embedded into the design phase of all processing activities (data protection by design). Personal data is processed with the highest privacy protection, so that by default personal data is not made accessible to an indefinite number of persons (data protection by default).



## **We manage data processing activities based on the level of risk involved**

The purpose of information security is to protect the confidentiality, integrity and availability of information in the event of equipment or software malfunction, a natural disaster or intentional, negligent or accidental acts both under normal and exceptional circumstances.

Information security management refers to the implementation of controls based on the level of risk involved. The University's statutory duties and overall risk management strategy govern the management of information security. We manage risks cost-effectively by putting in place practical controls to provide a safe and secure environment for processing data.

Our operations and services are dependent on the uninterrupted availability and safe functioning of IT services. To maintain information security, it is necessary to make strategic decisions and allocate sufficient resources for the activities and technical solutions. The level of security and related investments must be regularly discussed with the University's information security team.



## **Data protection is everyone's responsibility**

All types and forms of data must be kept safe in the course of processing activities and throughout the data lifecycle. When we process, for example, personal data, health data, confidential data or restricted data, we consider the possible special needs of the University units and whether it is necessary to put in place heightened security measures. The different dimensions of safety and security in the organisation (relating to administration, staff, physical safety, data, communications, hardware, software and operations) are separately considered. In addition, it is important to comply with information security requirements when procuring goods or services.

The University faces similar information security issues as other organisations, but further provisions are necessary to regulate information security in the context of research and teaching and because of the broad age range of our students and the extensive number of users. What makes the University different from other organisations in this respect is that in addition to users who are provided with University-issued devices, there is a large number of users (such as students, may researchers and visitors) who use their own devices to access our IT services. To maintain information security, all the members of the university community need to be aware of information security and comply with the University's instructions.

# 9 Public and confidential information

*The University is committed to openness and providing public access to information. As a rule, persons requesting specific information from the University are entitled to receive a public document as set out in the Act on the Openness of Government Activities. While it may be necessary to restrict access to information due to the obligations of confidentiality imposed by this Act, the decision not to disclose a document is not at the University's discretion but must always be made to comply with a specific legal obligation.*



## As a rule, we make documents openly accessible

The principle of public access to official documents and the Act on the Openness of Government Activities apply to Tampere University and the student union, and therefore the provisions set out in the Act govern access to and the confidentiality of our documents.

As a rule, we follow the principle of public access, meaning that documents and records held by the University's administrative bodies or staff are public documents unless otherwise provided by law. These documents are public documents regardless of their format.

Documents that do not fall into this category include, among other things, documents that are drawn up to support internal processes, such as comments or emails written by persons involved in ongoing decision-making processes, supervisory messages, preliminary negotiation documents, preparatory documents and unfinished documents. Preparatory documents generally become public documents after the decision has been signed.

In this context, it is important to acknowledge that **public access** and the **publication** of a document, for example, on the internet are two different things. When a document is published, it is often necessary to ensure that information security requirements are met.



## Non-disclosure is an exception and always based on law

As set out in the Act on the Openness of Government Activities, non-disclosure of documents held by the University must be based on law. Keeping a document confidential is an exceptional arrangement. The obligation to maintain confidentiality encompasses document secrecy, the non-disclosure obligation and the prohibition of use.

The University cannot label a document as confidential unless the criteria set out in the Act on the Openness of Government Activities are met. The key criteria for keeping a document confidential are listed in section 24 of the Act on the Openness of Government Activities. The reason for not disclosing a document must be included in the document alongside a reference to the relevant article of the Act on the Openness of Government Activities. A document can also be partially confidential, so the information that can be made publicly available must be disclosed upon request.

Generally information that must remain confidential relates to an individual's privacy or personal life, trade secrets or professional secrets. The period of secrecy for official documents is usually 25 years. A document that contains information about a person's private life or health must be kept secret for 50 years after this person's death.



## **We have an open-access policy for responding to requests for information**

All people are entitled to request information about a public document as defined in the Act on the Openness of Government Activities. A person requesting such information is not obligated to reveal his or her identity or disclose why he or she needs this information. However, the University generally needs to know the reason for requesting information if the request concerns a confidential document. A person is entitled to gain access to certain confidential documents that specifically concern him or her.

Information contained in a public document must be provided in the format requested by the person if this can be done without unreasonable effort. Information is generally provided verbally or as a electronic copy or a paper copy of the document.

The University has a duty to process information requests without delay. Information about a public document must be provided as soon as possible, no later than two weeks after receiving a request. If the University is asked to provide a large number of documents or complying with the request otherwise requires more time and effort than usual, the information must be provided no later than one month after receiving a request.

If the University refuses to disclose a document, the reasons for the refusal must be stated. A person requesting information is entitled to receive an appealable decision of such refusal. The final decision concerning document publicity will then be made by the Administrative Court.

# 10 Assessing the impact of changes

*When planning administrative or IT reforms or the procurement and deployment of information systems, we will assess how the changes impact our operations (processes, data resources, information systems, information security measures, records management and data archiving) and other stakeholders (information management entities, authorities, stakeholders, and customers). The goal of the assessment is to anticipate potential financial and operative risks and ensure that the plans are realistic. By assessing the impact of changes, we can safeguard the continuity and accessibility of our operations. It is important to recognise that IT reforms are often conducted to meet administrative and operative needs.*



## We assess the impact of changes in advance

As set out in the Data Protection Act, the University has a duty, as an information management entity, to maintain an information management model and assess the impact of essential changes and reforms on its operations. This assessment is integrated into our development model and decision-making processes. The assessment is always carried out when changes or reforms are planned.

The information management model describes the University's operational environment and allows us to assess how future changes will affect our operations. The university community is collectively responsible for keeping the information management model up to date. Staff members in all the University units are responsible for updating the information management model.

### Identify and analyse the need to make a change

After identifying the need to make a change, assess whether the change will **significantly** impact our operations. Changes are assessed against the information management model.

### Assess impacts from multiple perspectives

1. Organisation of information management and related responsibilities
2. Information security requirements and measures
3. Data, data processing and disclosure of data
4. Records management, archiving, information management pertaining to services
5. Confidentiality, public domain, data protection, right of access
6. Compatibility of data sets

The assessment is conducted by filling out a questionnaire.

### Plan the implementation of the change

After identifying the need for making a change and assessing its impact, draw up a plan describing the implementation of the change.



## We focus on assessing significant changes

We will identify the essential changes and assess their impact on our operations in advance. The assessment is not carried out as an isolated process but integrated into the development activities that are conducted to implement the change.

A change is considered significant, if it leads to changes in the University's information management model. A change can be the result of an administrative reform or it can affect data (including documents) or information systems.

### The following questions will help you identify significant changes

#### Organisation and processes

- Will the University's tasks or organisational structure change?
- Will new processes be developed? Will old ones be phased out, or will the current processes be changed?

#### Data protection and information security

- Will the changes affect the processing of personal data?
- Will the changes affect the processing of non-public data in digital environments?

#### Data, data resources and systems

- Will new information systems be introduced? Will old ones be phased out, or will the current systems be changed?
- Will the changes affect the transfer or disclosure of data?

#### Records management and archiving

- Will the changes affect the University's records, the scope of records or archiving needs?
- Will the storage location or the retention period of data change?

#### Public domain and non-disclosure

- Will the change generate new public or confidential data?
- Will access rights change?



# 11 Conflicts of interest and secondary employment

*The purpose of conflicts of interest regulations is to uphold good governance, neutrality and public trust.*

*The duty to disclose secondary employment and outside commitments is part of good governance and promotes the openness and transparency of our activities.*



## Conflicts of interest regulations apply to all our activities

Conflicts of interest may arise in the context of teaching, research, HR management, financial management and all other support functions.

A conflict of interest occurs when a person has private interests that could compromise, or could be seen to compromise, his or her objectivity, impartiality or professional judgement in the workplace. Potential conflicts are always assessed objectively on a case by case basis.

A member of staff may not take part in making decisions or discussing matters in which he or she has a private interest or even be present when such a matter is being discussed. A person with competing interests participating in such a discussion constitutes a procedural error.

As a rule, all the members of the university community have a duty to identify and declare any conflicts of interest. Multi-member administrative bodies assess their members' competing interests. Anyone participating in a process or an external person are entitled to report a suspected conflict of interest. The issue must be resolved without delay. Decisions about a conflict of interest cannot be appealed against.



## The University has a policy on secondary employment and outside commitments

We encourage our staff to take active part in society and business life. This especially applies to activities that support the professional growth of employees or otherwise increase the University's competitiveness or enhance its mission.

The term secondary employment and outside commitment refers to any occupation, employment or activity of a permanent nature that an employee engages in outside of his or her primary employment and that he or she is entitled to refuse, including self-employment and entrepreneurship. The term commitment also refers to all commitments that may interfere with an employee's primary employment at the University or create a conflict of interest with his or her work at the University.

A work-related commitment refers to a situation where an employee works for, or accepts an assignment from, a company or community that takes part in research, education or development projects carried out by Tampere University or pursues other activities that are closely connected to the employees' duties at Tampere University.

Our staff have a duty to disclose their secondary employment and outside commitments in accordance with the University's instructions. The disclosure is filed electronically and remains valid for one year.

# 12 Presentation procedure

*As a rule, the use of presentations to collect input that supports decision-making is not a legal requirement, but the University Regulations may include provisions regarding the scope of the procedure. As the presentation procedure is an important element of good governance, Tampere University has decided to integrate the procedure into its decision-making process.*



## The use of presentations to support decision-making is in line with the University's quality and procedural requirements

The universities in Finland have the legal status of a public institution or a foundation but they all carry out public tasks. There is a set of general quality and procedural requirements that govern their decision-making processes. These requirements concern, for example, meeting procedures, public access to and confidentiality of information, and best practices in information management. Besides due process, the presentation procedure ensures that careful preparations are carried out before making decisions. A presentation procedure does not apply to the assessment of a student's academic performance.

As set out in the University Regulations, a presentation procedure applies to decision-making by the Board, Academic Board, an appeals committee established by the Academic Board, faculty councils, President, Vice Presidents, the Directors of service units, Deans and Vice Deans. The administrative bodies at Tampere University adhere to the general presentation and meeting policy and may also have their own procedural guidelines that specify the general policy.



## The presenting official is responsible for ensuring that decisions are lawful and appropriate

The presentation procedure is an arrangement whereby a staff member designated as the presenting official draws up a decision that is brought before the relevant administrative body or person authorised to make the final decision. When drawing up the decision, the presenting official must look into relevant legal and regulatory requirements and other matters that have a bearing on the decision. The presenting official is responsible for delivering a lawful and appropriate presentation to support decision-making. The presenting official is also responsible for decisions that are taken based on his or her presentation. The presenting official will be responsible for the decision even if the final decision differs from his or her recommended decision. The presenting official must file a dissenting opinion to be released from this responsibility.

# 13 Participation in preparatory processes and decision-making

*The provision of information about the opportunities for participation and accessibility is part of our decision-making processes. The university community must be informed of the opportunities to participate in and influence decision-making as individuals or through representative participation. The goal is to ensure access to input from the community early on during decision-making processes.*



### **We foster interactive decision-making**

Participation and involvement in decision-making processes requires an understanding of the University's key administrative bodies and their tasks and the practices that govern their activities. Information about the key administrative bodies and decision-making processes must be readily available to the university community. When decision-making processes are conducted, it is important to separately agree on the schedule of the process and the timeline and methods for community participation and interaction. A sufficient amount of time must be set aside early on for participation and involvement to ensure that the members of the university community are able to provide input. The systematic planning of communication and interaction will ensure that the members of the university community have time to prepare and reflect on their views.



### **We take accessibility into account to encourage participation and involvement**

New digital tools will open up new channels for communication and collaboration. However, there is a risk that participation and involvement becomes fragmented and only those who have mastered the new tools are able to take part in decision-making processes. When planning how the community can participate in decision-making processes, a special emphasis must be placed on accessibility and clarity. Accessibility includes not only the technical accessibility of materials and documents but also visual and language accessibility.

# 14 Contract policy

*The members of the university community undertake thesis projects, co-funded projects, commissioned projects, clinical research studies and provide measurement and analysis services and continuous learning services. In addition, we commercialise research results independently. Tampere University is a multidisciplinary university that carries out activities around the world. We carry out research across a broad spectrum of disciplines in an attempt to address major scientific challenges and make a positive impact on society. We maintain high standards of quality when carrying out projects and are committed to meeting the needs of our collaboration partners. Our particular strengths include our staff members' broad experience of company collaboration, cost-effective processes, effective forms of collaboration and high-quality support services.*



## We are committed to openness

Our activities are based on a customer-centred approach and openness. Our goal is to carry out collaborative research projects that benefit both parties and lay a foundation for the development of further expertise. We draw up clear contracts where project foreground and background are clearly defined, and we assess the need to enter into a data protection agreement. Contracts are always accompanied by a written description of the assignment.

We adhere to the guidelines issued by the Finnish National Board on Research Integrity (TENK). We conduct projects in accordance with the principles for the responsible conduct of research and keep to the agreed schedule. Projects are completed to a high standard by or under the supervision of trained and professional research staff.

In all our company collaborations, we make sure that public funding is not used to subsidise companies. Research services are priced based on the total cost model, and the right to utilise intellectual property arising from research is granted in exchange for market-based compensation. When calculating the amount of compensation, the contribution of partner companies in creating research results is taken into consideration.



## Our collaborations are based on a sense of responsibility

Tampere University discontinues collaboration with third parties that engage in questionable or illegal business activities or violate contracts signed with the University. We discourage collaboration with industries that are involved in activities that have been shown to damage the health of humans or animals. For this reason, we do not collaborate with the tobacco industry.

The University's maximum liability for damages and its contractual obligations must be clearly set out in all our contracts and agreements. The University does not agree to general, sweeping confidentiality provisions, give absolute guarantees of the non-violation of the intellectual property rights of third parties, or pledge to deliver commercially viable results or results that resolve a specific problem.

Tampere University must have the right to release scientifically interesting research results into the public domain. Research results are published in cooperation with collaboration partners. We do not publish trade secrets, and our collaboration partners have the opportunity to seek intellectual property protection for research results with commercial potential.



# 15 Procurements

*Here the term procurement refers to the purchase of goods and services from outside of Tampere University and in some cases from in-house units that fall into the category of affiliated unit as described in applicable legislation. The University unit that carries out a procurement process is responsible for the lawfulness, regulatory compliance and responsible conduct of the process.*



## We plan and carry out procurements responsibly

The University uses public funds to purchase goods and services and therefore carries out all procurements in compliance with Finland's Public Procurement Act and the European Union's public procurement directive and practices. The legal requirements impose restrictions on procurements and procurement procedures, especially when their value exceeds specific thresholds. The requirements must be strictly followed, as non-compliance could result in significant financial penalties and impact the University's activities. Besides applicable legislation, we adhere to the University's internal procurement policy that is binding on all the University units. In addition, we comply with the requirements of funding agencies when purchasing goods or services in the course of projects but always ensure that the legal requirements are not violated in doing so.

Public procurements must be carefully planned and systematically managed. This also applies to externally funded projects; when a budget is prepared for such a project, it is important to consider the possible purchase of necessary goods or services in the course of the project. At the stage when grant proposals are prepared, we assess the possible need to purchase goods or services in the course of the project as carefully as possible to ensure that sufficient funding is set aside for purchases in the confirmed budget if the grant proposal is approved.

We carry out procurement processes cost-effectively and are committed to ethical and sustainable procurement practices. The equal and non-discriminatory treatment of bidders as well as openness and transparency are important principles for the University. If a procurement entails the processing of personal data, we assess the need to enter into a data processing agreement and, if necessary, conduct a data protection impact assessment.



## **We maintain high-quality procurement activities and support the university community with tendering processes**

We maintain procurement practices that meet high standards, actively develop and monitor our procurement processes and guidelines, and help the university community carry out procurement activities. We monitor the quality of purchased goods or services throughout the procurement process and while the related contract remains in force. We take the necessary steps if the delivered goods or services do not meet our expectations.

As a rule, all procurements that exceed the EU or national threshold as well as important low-value procurements are conducted in cooperation with the University's Procurement Services to ensure that the processes are carried out lawfully and effectively. The importance of a specific procurement is assessed, among other things, based on the value of the contact, the conventional nature of the procurement and other interests. For example, a low-value procurement may be important based on non-financial criteria (such as the extensive processing of personal data). If the University has signed or joined a framework agreement, the goods or services must be primarily purchased from the preferred supplier. The unit purchasing the goods or services is responsible for looking into appropriate framework agreements.



## **We only purchase goods and services from responsible partners**

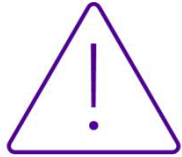
Partner vetting is an integral part of managing procurement-related risks. We exclude bidders who fail the vetting process. Besides criminal convictions, we will check, among other things, for outstanding tax liabilities and social security payments. If the value of a contract exceeds the EU threshold or the national threshold, partner vetting is generally carried out by Procurement Services in connection with competitive tendering. If the value of a contract falls below the threshold (low-value procurement), vetting is conducted by the unit in charge of the procurement.

We monitor our contracts and the social responsibility of our contracting partners throughout the procurement process and subsequent contract term. We have a duty to take reasonable steps to ensure that a supplier is trustworthy and may be reasonably expected to meet the obligations under the contract. When we use the services of subcontractors, we are also bound by the Act on the Contractor's Obligations and Liability when Work is Contracted Out and therefore have a duty to ensure that our contracting partners have fulfilled their legal obligations as contracting parties and as employers. Should the circumstances of a supplier change, the impact of the changes must be assessed to determine whether it is possible to continue the partnership.

# 16 Export controls and sanctions

*Tampere University has a duty to comply with national and international export controls and trade sanctions. These restrictions are a powerful tool for the international community to stop the proliferation of weapons of mass destruction and prevent and contain conflicts.*

*All University employees must be able to determine, for example, whether their research is subject to export controls and whether the restrictions affect hiring decisions and know how to proceed. A researcher, employee or the University management may be held personally liable for non-compliance with export controls and sanctions. As set out in the Criminal Code of Finland, the criminal penalties for violating export controls and sanctions include a fine or up to four years of imprisonment.*



## We comply with export controls and sanctions

Applied research is the primary area that may fall under export controls in higher education institutions. As a rule, the regulations do not apply to basic research or open research. In practice, externally funded research rarely meets the criteria for basic research or open research. However, publications resulting from scientific basic research or open research may still require an export license. Under certain circumstances, an export license is also required for exporting goods (such as software, technology, service) that also entail the transfer of data outside of Finland.

When a research project begins, researchers and staff members have a duty to determine whether goods or technologies that will be developed or used during the project are dual-use items or fall under the scope of export controls or trade sanctions. They can consult the University's Export Controls and Sanctions Policy that was drawn up to ensure that all activities undertaken at Tampere University comply with export controls and sanctions. If export controls or sanctions are found to have an impact on research activities or if collaboration partners have special terms and conditions that impose related obligations on the University, appropriate steps must be taken in cooperation with the University's Research Services.

### Export controls

- export controls regulate **arms, defence and dual-use exports**

### Dual-use items

- are **products, software or technologies** that are designed for civilian use but could be modified to be used in **military applications and/or contribute to the proliferation of weapons of mass destruction** (such as nuclear substances, special materials and related equipment, electronics, certain computer devices, data communications and data protection equipment, and sensors and lasers)
- exporting dual-use goods always requires a **license**

### Sanctions

- sanctions are legal measures that are generally imposed on **the citizens, other entities and financial institutions** of a sanctioned country
- sanctions imposed on specific individuals and entities usually **restrict the direct or indirect transfer of assets or financial resources** to the designated individuals or entities.
- sanctions may also be imposed to **restrict the export** of goods that fall outside of the scope of general export regulations.
- sanctions compliance must be assessed before transferring research results to an organisation located in an export controlled or sanctioned country or in case the research group includes citizens of such a country.

**When do goods  
require a permit  
to be exported?**

If the item falls into the category of defence material, the licensing authority is the Ministry of Defence of Finland.

If an item is a civilian firearm or ammunition, the licensing authority is the National Police Board of Finland.

If an item is a civilian firearm or ammunition, the licensing authority is the National Police Board of Finland. (\* Council Regulation (EC) 428/2009 Appendix 1)

If the Ministry for Foreign Affairs of Finland has indicated that an item is or may be wholly or partially intended to be used in weapons of mass destruction (or to finalise them to) or for military purposes in a country that is subject to arms embargo, the licensing authority is the Ministry for Foreign Affairs of Finland.

If an item is intended to be exported to an export controlled or sanctioned country and restrictions or regulations may apply to the item, end users or export, the licensing authority is the Ministry for Foreign Affairs of Finland.

# 17 Reporting suspected misconduct

*Tampere Universities adhere to the principles of honesty, equality, non-discrimination and responsibility in all their endeavours. We have policies in place to prevent misconduct. All the members of our community who have reason to suspect someone of non-compliance with the institutional policies and regulations have a duty to report their concerns. We will investigate suspected misconduct to enforce the principles of good governance and encourage everyone to report misconduct or suspicions thereof.*



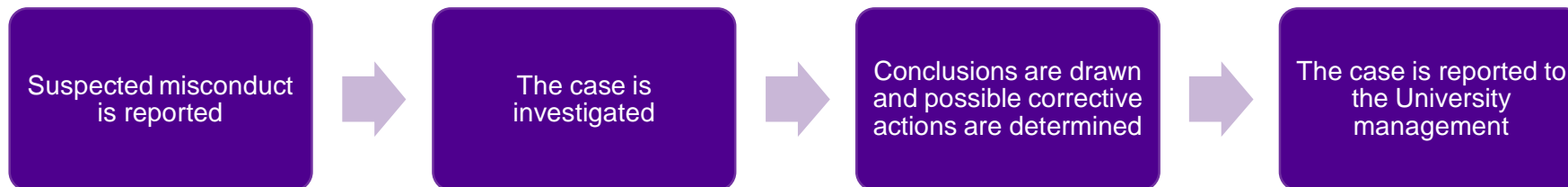
## We encourage reporting cases of suspected misuse

It is important that we observe our activities and report suspected misconduct, such as any activity that violates the law or the University's policies and procedures. All the members of the university community and external persons have the option to report violations through the anonymous reporting channel if they are unwilling to raise their concerns in person. Designated staff members will process the reports in strict confidence.



## We investigate suspected misuse in accordance with the principles of good governance

Suspected misconduct will be investigated to establish the facts and, if necessary, determine appropriate corrective action to maintain compliance with the principles of good governance. Cases of misconduct will be addressed by the University in accordance with its internal procedures but will be referred to the appropriate public authority, if necessary. We ensure that the reporting channel and the procedure for investigating allegations of misconduct meet the data protection and information security requirements.





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