

Deliverable 2.4

CleverGuard Ethics Manual

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Abstract

D 2.4 “Ethics Manual” serves to guide the actions of our members consistent with our Consortium values. The Code helps our people do the right thing and play by the rules wherever we operate around the world.

What is new in this Version

This is the first version of the CleverGuard Ethics Manual

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1 INTRODUCTION AND SCOPE

1. What is the CleverGuard Code of Ethics?

Our Code of Ethics serves to guide the actions of our members consistent with our Consortium values. The Code helps our people do the right thing and play by the rules wherever we operate around the world.

Sometime, you might face a situation where the right thing to do is not obvious. That is where our Code of Ethics can help. It is always here as your guide to preserving our reputation and living our values. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear.

2. Why do we have a Code, and why must we follow it?

To continue to operate and maintain our reputation as a Consortium that puts first the needs of the people we serve around the world, we must each learn, understand and comply with our Code. Complying with our Code is about creating an open and honest environment where we can achieve our best work legally and with integrity. And, we can be proud of how we overcome our challenges and achieve our successes. Whenever we become aware of a violation of the Code, Consortium policy or the law, we will act to address the problem and prevent future occurrences. Depending on the circumstances, corrective and preventive steps might include training, counselling and disciplinary actions up to and including termination of partnership.

3. How to make the right decision

Doing what is right is our goal. If the right thing to do is not clear, ask yourself:

- Is it consistent with our Code?
- Is it legal?
- Does it follow our policies?
- Does it benefit the Consortium as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If you can answer “YES” to all of these questions, the action is probably okay. But any “no” or even “maybe” answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure.

4. Who must follow the Code?

It does not matter where you work or what you do for the Consortium – you have a responsibility to use good judgment and follow our Code. That includes every full-time or part-time contributor at every level of the Consortium.

People managers have additional responsibilities to serve as a positive role model in every respect and to help people review, understand and apply the Code.

5. Every member's responsibility

To fulfil our responsibilities and maintain and enhance our culture and reputation, we rely on our people to help enforce the Code. If you think there is a violation of the Code, or if you think an activity or behavior could lead to a violation, it is your responsibility to speak up.

Whether you report anonymously or give your name, you should provide as many details as possible, so the issue can be addressed thoroughly and promptly. In addition, you have a responsibility to cooperate in an investigation.

Our Consortium does not tolerate retaliation against anyone who raises a concern under this Code or assists with an investigation.

Any member who engages in retaliation will face disciplinary action, which could include termination of membership.

6. Reporting Concerns

You have a responsibility to speak up when you are in a situation or are aware of a situation that you believe may violate or lead to a violation of the Code, Consortium policy or the law.

Maybe you sense that something is not right at work, or you saw something or heard about an act that may violate our Code, our policies or the law. If so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred. When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our customers, our suppliers and other business partners.

CleverGuard core values require compliance with the law, as well as ethical conduct. If you feel these standards have not been met, need access to policies, or have any questions, please ask for guidance or voice your concerns by contacting any of the following resources:

- info@cleverguard.care
- CLEVERGUARD c/o CLEMAP AG, Lavaterstrasse 66, 8002 Zürich, Switzerland

2 GENERAL PRINCIPLES

The Code of Ethics is based on a number of General Principles that express the basic tenets of ethical and professional behaviour and conduct. Observance of these General Principles is central to the public interest.

2.1 INTEGRITY

Members must behave with Integrity in all professional and business relationships. Integrity implies not merely honesty but fair dealing and truthfulness.

- We are straightforward and honest in our professional opinions and business relationships.
- We are truthful about the services we provide, the knowledge we possess, and the experience we have gained.

We operate true to a purpose that serves society, respect the dignity of people and so generate a fair return for responsible investors.

Incompatible Activities: A member must not engage in any business, occupation or activity that impairs or might impair the member's Integrity, or the good reputation of the profession.

2.2 OBJECTIVITY

Members must be fair, impartial and intellectually honest, and must not allow prejudice or bias, conflict of interest or influence of others to override Objectivity. Members undertaking certain types of engagements must be, and be seen to be, Independent.

We do not offer, accept or solicit any gifts, entertainment or hospitality that we have reason to believe may be intended to improperly influence business decisions or impair objectivity.

2.3 PROFESSIONAL COMPETENCE:

Members must only undertake professional work in which they have the Competence necessary to perform the work to the technical and professional standards expected.

We foster innovation and new ideas to improve the value and performance of our services.

We encourage partners to invest in people to develop the professional knowledge and skills necessary for them to effectively perform their roles.

FAIR BUSINESS PRACTICES

We respect our competitors and are committed to fair business practices. We receive fees that reflect the value of services provided and responsibilities assumed.

2.4 CONFIDENTIALITY

The responsibility of respecting privacy applies to CleverGuard members in a particularly profound way. Our technology requires the collection, monitoring, and exchange of personal information constantly, quickly and inexpensively. Therefore, a member should become conversant in the various definitions and forms of privacy and should understand the rights and responsibilities associated with the collection and use of personal information.

When our users do business with us, they entrust us with their personal information or third parties' personal information. Our members do the same when they join the Consortium. We take our responsibility and obligations to our users and members seriously to collect, use and process any personal information only for legitimate business purposes and protect it from possible loss, misuse or disclosure.

We protect and take measures to safeguard the confidential and personal information that we hold, collecting and handling it in compliance with applicable laws, professional obligations, and our own data management policies and practices.

Members should only use personal information for legitimate ends and without violating the rights of individuals and groups. This requires taking precautions to prevent re-identification of anonymized data or unauthorized data collection, ensuring the accuracy of data, understanding the provenance of the data, and protecting it from unauthorized access and accidental disclosure. Members should establish transparent policies and procedures that allow individuals to understand what data is being collected and how it is being used, to give informed consent for automatic data collection, and to review, obtain, correct inaccuracies in, and delete their personal data.

Only the minimum amount of personal information necessary should be collected in a system. The retention and disposal periods for that information should be clearly defined, enforced, and communicated to data subjects. Personal information gathered for a specific purpose should not be used for other purposes without the person's consent. Merged data collections can compromise privacy features present in the original collections. Therefore, computing professionals should take special care for privacy when merging data collections.

2.4.1 Protect your co-workers.

You would never want your personal information to be disclosed. The same goes for your co-workers. Secure their personal information as you would your own, protecting it from deliberate or accidental exposure. Whether you work with this information or come across it inadvertently, do all you can to handle it properly and uphold data privacy and protection laws wherever we work.

2.4.2 Protect our users

We are committed to protecting the personal information of our users and other third parties. We have a [Privacy Policy](#) to govern our Consortium-wide use of personal information. Additionally, we comply with our legal obligations to protect personal information from unauthorized disclosure and ensure the integrity and availability of personal information.

2.4.3 Protecting Consortium assets

~~All the~~ ~~The~~ technologies ~~iesy~~ that connects us to others, the ideas we develop, the emails we exchange, the computers and mobile devices we use to do our jobs, ~~... all of this and more~~ are Consortium assets that we are each entrusted to protect. We use them to carry out Consortium business and must protect them from damage, loss, misuse and theft.

2.5 PROFESSIONAL BEHAVIOR:

Members must act in a manner consistent with the good reputation of the profession and refrain from any conduct which might bring discredit to the profession. We comply with applicable professional standards, laws and regulations and seek to avoid actions that may discredit ourselves or our professions.

2.5.1 How We Treat Our users

We respect diversity in each other, our customers and suppliers and all others with whom we interact.

We seek to build lasting relationships with users, therefore we deal honestly with users, providing good and safe products and services, openly share knowledge to enable users to make better informed choices¹

2.5.2 How We Treat One Another

We treat everyone with dignity and provide fair pay for all
We enable and welcome constructive dialogue about our behaviour in keeping true to our purpose.
We protect and nurture all who work for us to ensure people also learn, contribute and thrive.

2.5.3 Anti-bribery and corruption

Our success is based on the quality of our products, never on unethical or illegal behavior. We do not tolerate acts of bribery or corruption. And we never offer or accept anything of value in order to get business, keep business or gain an unfair advantage.

2.5.4 Fair competition

We compete fairly and within legal boundaries. We know that everyone benefits from a competitive marketplace, so we follow the antitrust and fair competition laws in all locations where we operate and avoid even the appearance of unfairly restricting another company's ability to compete against us.

Be careful at conferences. Do not discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, terms or conditions of sale, market segments, users or marketing strategies. If a discussion turns to a competitively sensitive subject, stop the conversation, remove yourself from the situation and immediately report the incident to Consortium legal counsel.

Gather competitive intelligence ethically and lawfully. Obtaining information about our competitors is a normal business practice and necessary to be an effective competitor, but make sure you do it properly. Use public or other permitted sources and be honest about who you are and who you work for. Do not gather, or ask someone else to gather, information using any illegal or illicit activity.

Win business the right way. Deal honestly and fairly with our customers. Promote positive business relationships and never take unfair advantage of anyone by misleading or deceiving them. Be truthful about our Consortium and what we sell – do not make any claims you cannot substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.

¹ A Blueprint for better Business https://65b0bf3a-0d59-4dc1-9d73-3eea73f1323a.filesusr.com/ugd/f1264d_1722ccc8e7a3405e8ee2d42ccccec62d.pdf

2.5.5 We avoid conflicts of interest

A conflict of interest is a situation in which a person or organization has conflicting interests or responsibilities, financial or otherwise, and serving one interest could have an adverse impact on those other interests or responsibilities.

2.6 BEHAVIOURS NEEDED TO BUILD CHARACTER & ACHIEVE PURPOSE²

2.6.1 Solidarity - Other people matter

Judge decisions as good, or not, in the context of the best values, expectations and needs of those with whom we should seek to build relationships. Do not make decisions in a self-interested, self-determined, closed world that does not weigh sufficiently the impact on others. Make a fair contribution to society and avoid actions that cause inequality. Opportunities should be sought to serve the broadest community, including the underserved, the underprivileged and the excluded; not to emphasise the divide but rather to bring people together, through new job opportunities, innovative goods and services, and new markets.

2.6.2 Subsidiarity - Freedom with responsibility

Allow people to develop by being able to contribute to making decisions at all levels. Do not create dependency through reserving decisions unnecessarily to higher levels in the hierarchy, or lose accountability through inappropriate delegation. Give people the freedom, and support where necessary, to take on the risk of decision making and to have a voice in their work, thus fostering innovation, creativity and a sense of shared responsibility.

2.6.3 Reciprocity - Building trust and trusted relationships

Start with basic honesty and integrity so that each and all receive what they are entitled to or can reasonably expect. This is the first stage of building trust. Then go beyond this minimum, using knowledge and capabilities to provide benefits that people desire and value but cannot expect or demand, in particular in situations of information asymmetry or power imbalance. Fair and efficient markets depend on trust and trusting relationships.

2.6.4 Plurality - Valuing diversity and building bridges

Be clear as to who you are and what you stand for, combining this with an openness to enrichment from others, valuing diversity of thinking and cultures. Favour curiosity and inclusion over suspicion and exclusion of those who think differently. Maintain consistency of purpose and values whilst embracing diversity, encouraging closeness to people, markets, innovation and growth.

2.6.5 Sustainability - Stewardship of people, values and resources

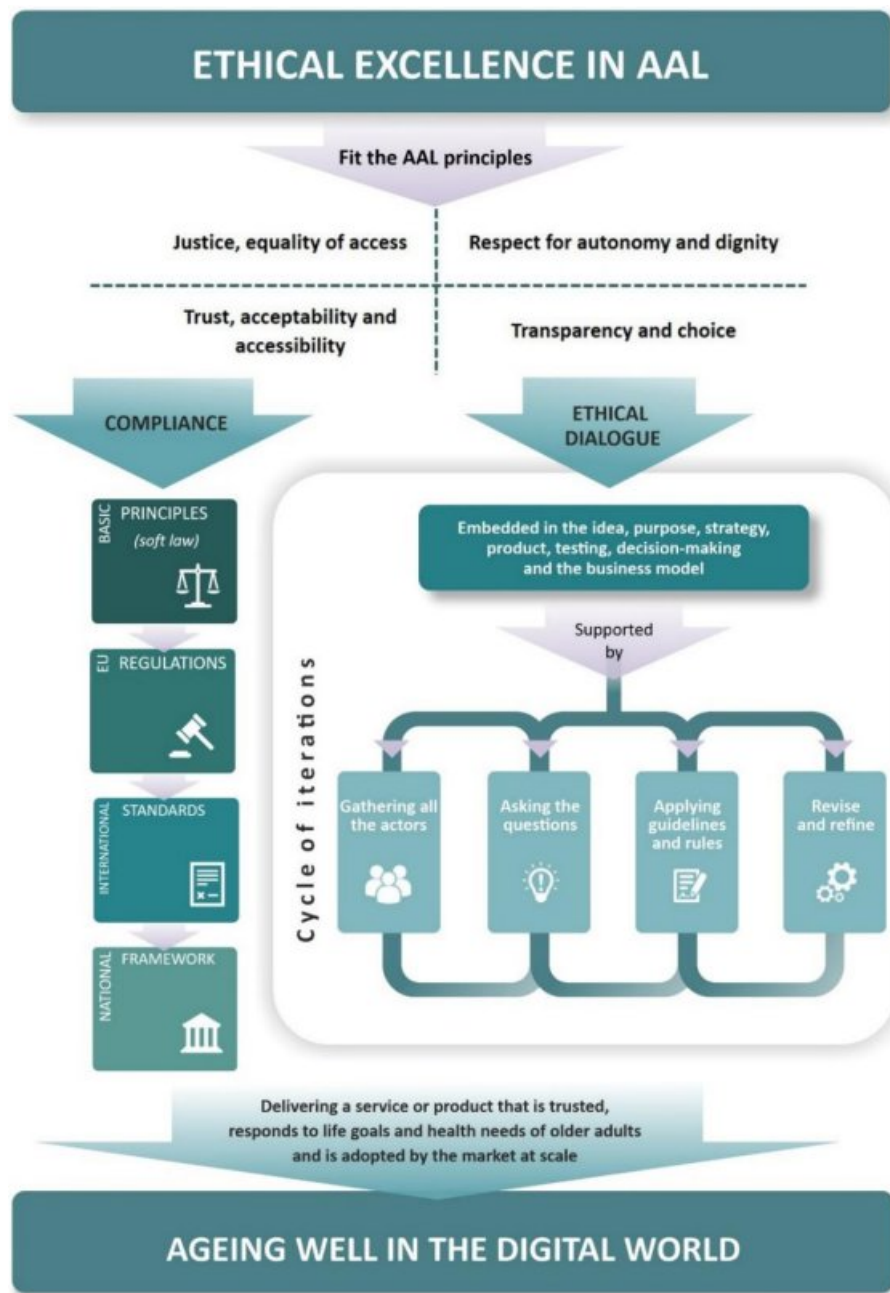
Acknowledge and seek to measure the impact the business has on people, values, resources, and the environment. Accept responsibility for those impacts. Then take steps to develop people, nurture values, preserve and restore existing resources and create new ones where possible so that others

² Principles from A Blueprint for Better Business

may enjoy their benefits. Use your knowledge, influence and experience in collaboration with others for the benefit of all.

2.7 WE RESPECT LAWS AROUND THE WORLD

We operate around the globe and respect the laws wherever we do business. This helps us to build trust with governments, strengthen the communities where we live and work, and contribute to a fair society where we enjoy the protection of these same laws.



3

³ <http://www.aal-europe.eu/aal-guidelines-for-ethics-data-privacy-and-security/>

3 INTERNATIONAL STANDARDS

4 SUMMARY

These principles are to be observed by CleverGuard members at all times. The Code of Ethics is intended to provide guidance to help resolve ethical dilemmas that are likely to be confronted within the course of their employment with CleverGuard. The issues listed in the Code are not exhaustive and do not seek to envisage every potential ethical dilemma. For more information contact info@cleverguard.care.

5 List of references

<http://www.aal-europe.eu/aal-guidelines-for-ethics-data-privacy-and-security/>

<https://www.blueprintforbusiness.org/the-framework/>

<https://www.ombudsman.europa.eu/en/report/en/107799>

[Universal Declaration of Human Rights](#)

