The Burroughs
Hendon
London
NW4 4BT
United Kingdom

www.mdx.ac.uk

14 February 2024

Ref: FOI/January/2024/MS

By email to: millie@ded1.co

Dear Millie Sullivan

Your request for information received on 18 January 2024 has been dealt with under the provisions of the Freedom of Information Act 2000 (FOIA).

You requested the following information:

In the below request the phrase 'investment policy' refers to any commitment by the university for an ethical investment portfolio. Other names for this can include but not limited to 'Socially responsible investment policy' or 'ESG governance and investment'

On your financial regulations document (https://www.mdx.ac.uk/__data/assets/pdf_file/0029/675560/MDX-financial-regulations-2022-v1.3-FINAL.pdf), you mention in appendix B "The following are the minimum required set of Finance and Procurement policies and procedures:.. 9. Investment policy" but it is not available on the university website.

In the below request the phrase 'ethical research policy or statement' refers to **any commitment** by the university **to exclude** any collaborative effort, working relations or financial gain from a research project or partnership that has any connection to **arms trade companies**.

The phrase 'arms trade companies' relates to, but not limited to:

a company that is involved in any capacity in manufacturing (parts or complete), production, sales or exports of weapon systems (including small and light weapons, heavy and conventional weapons, and nuclear weapons) in one or more sectors (including dual-use purpose companies).

On your website, I found a link to your available policies but could not see either of these policies

Please may I request the full documents for any ethical investment or research policy or statement of ethical criteria within the last five years.

The University's response

The University has no policy specifically referring to 'any commitment by the university to exclude

any collaborative effort, working relations or financial gain from a research project or partnership that has any connection to arms trade companies'.

The university's Research Policy [https://www.mdx.ac.uk/__data/assets/pdf_file/0036/197838/Research_APS4pdf.pdf] makes no specific mention of this, and neither does our Code of Practice for Research [https://www.mdx.ac.uk/__data/assets/word_doc/0025/217393/CoP-for-Research-approved-15-Apr-2016.doc]. Related policies (on Conflict of Interest and Commitment; Ethics Framework; Freedom of Information; Data Protection; Sustainability; The Management of Confidential Information: Code of Practice and Procedures; and the Financial Regulations are available online at https://www.mdx.ac.uk/about-us/policies .

Please also find attached full PDF of investment policy.

Your Right to Request a University Review of the Response

If you are not satisfied with the response above, you have the right to request a review. You should address your review request to Jo Farrington, using the email address: j.farrington@mdx.ac.uk.

A review request must be made within 40 working days of the response you want reviewed. Please note we are not obliged to carry out a review if the request is made after 40 working days.

When we acknowledge your review request, we will specify when you will receive the review outcome, which should be 20 working days from the date we received your review request. There may be circumstances where we will need more time to complete an internal review, for example if the matter is complex, or we need to consult with third parties, or we need to consider substantial amounts of information. If we do need additional time we will let you know when we acknowledge the review request. Any extension of time should not exceed an additional 20 working days, unless there are legitimate reasons for a longer extension.

The outcome of the review request will be one of the following

(I) To uphold the response provided in this letter above;
(II) To reverse it; or
(III) To modify it.

If you remain dissatisfied with the outcome of the review, you may complain to the Information Commissioner's Office.

Yours faithfully