



**European  
Network of  
Living Labs**

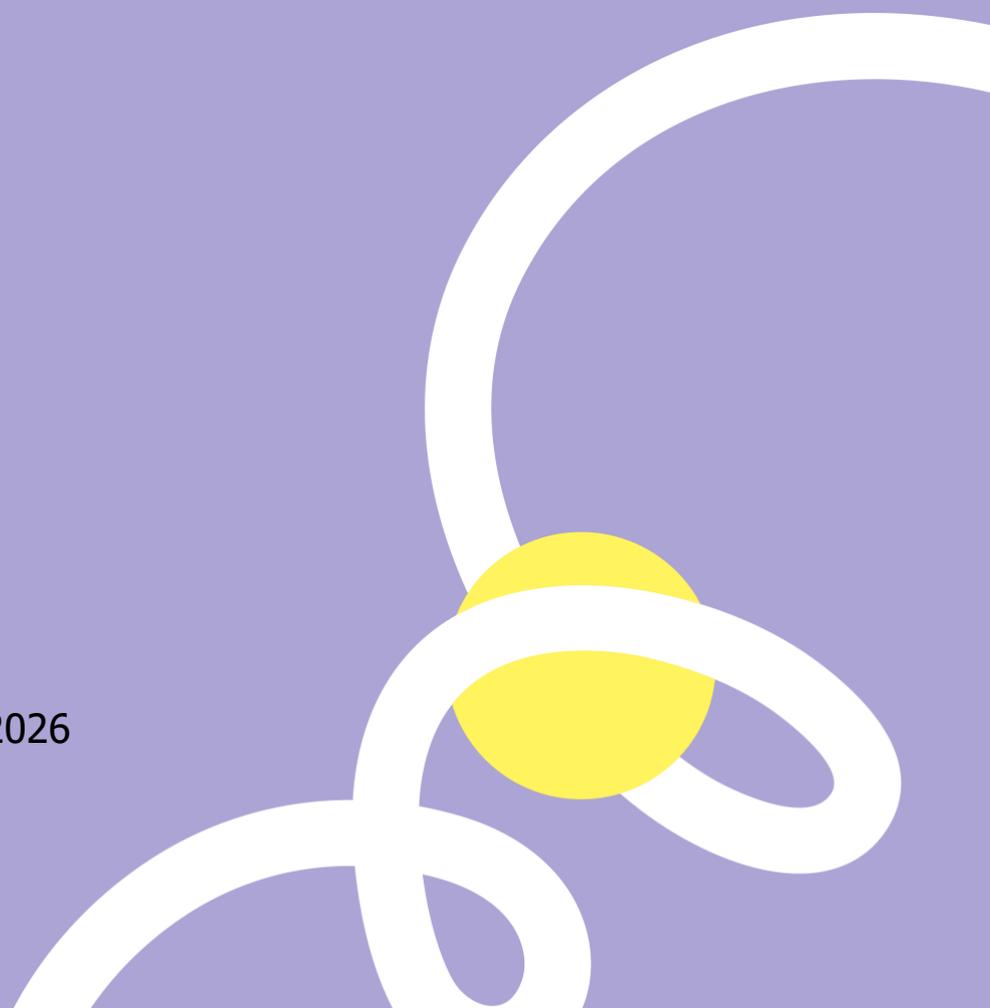
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# **ENoLL Ethical Code of Conduct & Membership Policy**

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# ENoLL Ethical Code of Conduct & Membership Policy

## 1 Purpose and principles

ENoLL mission is to strengthen living labs through **collaboration, inclusivity, openness**, in order to achieve impact (social, economical, scientific...) by acting in an ethical way. This Code sets the ethical baseline for membership and behaviour within the Network, and defines the procedural approach to admitting, monitoring, suspending or excluding Members.

This Code aims to:

- Protect Members, communities and build/maintain public trust.
- Ensure activities and Members align with ENoLL core values.
- Provide transparent, fair and legally compliant processes for membership decisions.

The Ethical Code of Conduct is based on ENoLL underlying principle: Living Labs for Good.

## 2 ENoLL Core Values

ENoLL is guided by a set of core values that shape its vision, actions, and impact:

**Collaboration** ENoLL fosters meaningful cross-border and cross-sectoral partnerships, strengthening ties between living labs and the broader open innovation ecosystem. It acts as a trusted reference point, connecting diverse stakeholders to amplify collective innovation capacity.

**Inclusivity** ENoLL is committed to ensuring that everyone - regardless of background, ability, or status - can actively participate in innovation. Its approach is both citizen-centric and systemic, empowering vulnerable groups, cities, policymakers, and pioneers alike to co-create sustainable solutions.

**Openness** ENoLL believes in the power of transparent processes, shared knowledge, and open innovation. By encouraging experimentation and the free flow of ideas, it creates environments where innovation thrives and value is co-created.

**Impact** ENoLL's initiatives aim to create tangible, long-lasting societal value. It prioritizes innovation that addresses real-world challenges, supports sustainable development, and improves quality of life for all.

**Stewardship** ENoLL promotes the responsible development and management of living labs, ensuring that innovation ecosystems are ethically governed, purpose-driven, and sustainably resourced.

**Ethics** ENoLL upholds the highest standards of integrity and responsibility in all its endeavors. It is committed to fostering innovation that is fair, transparent, and respectful of individual rights and societal well-being, ensuring that all activities adhere to ethical principles.

### 3 Eligibility to apply for membership

Any entity (living lab, research group, public body, private organisation, NGO, community group) that meets the formal application criteria may apply, provided that:

1. The applicant's activities are compatible with ENoLL core values (collaboration, inclusivity, openness, impact, stewardship, ethics).
2. The applicant commits to comply with applicable laws, human-rights obligations and data/participant protection standards. (e.g. GDPR<sup>1</sup>)
3. The applicant provides truthful information in its application and on-going reporting.
4. The applicant should sign the following declaration:

“As an applicant representing Organisation X, I commit to the ENoLL Ethical Code of Conduct and to upholding its core values of openness, inclusiveness, collaboration, and integrity. To the best of my knowledge, neither the organisation nor its leadership is subject to any final convictions or authoritative international determinations falling within the categories of serious misconduct set out in ENoLL’s red-line criteria. I acknowledge that membership may be suspended or revoked if this declaration is found to be inaccurate or if circumstances subsequently arise that are incompatible with ENoLL’s values.”

ENoLL may require supporting documents or references.

### 4 Expected conduct of Members

Members must:

- Act transparently and collaborate in good faith.
- Prioritise inclusive, user-/citizen-centred design and avoid discriminatory practices.
- Respect participant rights (privacy, consent, safety) and applicable data protection laws.
- Avoid conflicts of interest or disclose them proactively.
- Uphold sustainability and stewardship of living-lab resources.
- Abide by this Code and report breaches or concerns promptly through ENoLL reporting channels.
- Ensure integrity, accuracy, and openness in communication, dissemination and reporting of activities.
- Foster mutual respect and constructive dialogue across disciplines, sectors, and cultures.

## 5 Red Lines: Grounds for Suspension or Exclusion

Any confirmed violation of the following "Red Line" principles will lead to an immediate investigation and potential **suspension or permanent exclusion** from the ENoLL network by the Governing Board, following a clear, documented disciplinary approach.

1. **Breach of Core Law:** Confirmed violation of national or international law, particularly concerning human rights, research ethics, and anti-corruption.
2. **Severe Criminality:** Involvement in or support for major criminal acts, including **atrocious crimes, genocide, war crimes, and crimes against humanity**.
3. **Corruption:** Any confirmed act of offering, giving, soliciting, or receiving bribes or engaging in financial corruption.
4. **Criminal Convictions:** Serious criminal charges or convictions that fundamentally compromise public trust in the member organization.
5. **Severe Data Breach/Misuse:** Intentional, repeated, or severe breaches of data protection regulations (e.g., GDPR) or unauthorized use of personal/confidential data.
6. **Falsification and Fraud:** Intentional and systematic fabrication, falsification, or plagiarism in formal ENoLL processes (Labelling, Value Capturing) or project reports.
7. **Pattern of Non-Compliance:** A persistent failure to correct known violations of this Code of Conduct after formal notification.

## 6 ENoLL Disciplinary and Sanctions Policy

This policy governs the procedure for reporting, investigating, and resolving alleged breaches of the ENoLL Ethical Code of Conduct. Its purpose is to ensure fairness, proportionality, and transparency in upholding the integrity of the ENoLL network.

### 6.1 Triggers for Suspension and Exclusion (When to Suspend)

A member organization shall be subject to investigation and potential suspension or exclusion if there is credible evidence of:

#### 6.1.1 Immediate Suspension Triggers (Red Lines)

Immediate suspension is warranted if the alleged breach falls under any of the "Red Line" violations defined in the Ethical Code of Conduct (Section III), as these fundamentally compromise the trust and integrity of the Network:

- Confirmed breach of national or international law.<sup>2</sup>
- Involvement in Severe Criminality (e.g., atrocity crimes, genocide).
- Confirmed acts of Bribery or Corruption.
- Severe or intentional Data Misuse/Breach.
- Falsification or Fraud in ENoLL processes (Labelling, Value Capturing, Reporting).

#### 6.1.2 Progressive Sanction Triggers (Non-Compliance)

Sanctions, starting with formal warnings and potentially escalating to temporary suspension, are warranted for a persistent failure or pattern of non-compliance with the Core Principles and Operational Standards (Sections I and II) of the Code of Conduct, particularly after prior consultation and remedial action attempts have failed.

## 6.2 Reporting Mechanism (Who Will Denounce)

The reporting system is designed to be accessible and confidential. A complaint may be filed by any party with direct knowledge or credible evidence of a breach:

Denouncing Party	Reporting Channel
<b>ENoLL Members (Effective, Adherent, Partners)</b>	Designated Ethics Officer or Secretariat
<b>External Stakeholders (Users, Public Authorities, Partners)</b>	Dedicated, confidential ethics email address (managed by the Secretariat)
<b>ENoLL Staff or Board Members</b>	The President of the Council (or Secretary if the President is the subject of the complaint)
<b>Self-Reporting (Mitigating Circumstance)</b>	Direct report to the Secretariat or Council

**Confidentiality:** All reports will be handled with strict confidentiality. The identity of the denouncing party will be protected, except where legally required to be disclosed or where the denouncer agrees to disclosure as part of the formal investigation process.

## 6.3 Disciplinary Procedure (Steps Taken by the Secretariat)

The process is structured to guarantee due process, involving three distinct phases: **Initiation, Investigation, and Decision.**

### Phase 1: Initiation and Triage (Secretariat)

Step	Action	Responsibility
<b>3.1. Receipt</b>	Log the formal written complaint, ensuring it is dated and contains specific details and evidence related to the alleged breach.	Secretariat
<b>3.2. Triage &amp; Notification</b>	The Secretariat, in consultation with a designated member of the Governing Board,	Secretariat / Board Designee

	assesses the severity and credibility of the complaint. If the complaint meets the criteria for investigation, the Secretariat formally notifies the accused member organization of the complaint and the initiation of proceedings.	
<b>3.3. Interim Suspension</b>	If the complaint alleges an immediate <b>Red Line</b> violation (e.g., criminal charges, severe data breach) that poses a reputational or legal risk to ENoLL, the Governing Board may vote to impose an immediate, temporary suspension of membership rights (e.g., voting, use of the ENoLL brand) pending the full investigation.	Council

### Phase 2: Formal Investigation (Council)

Step	Action	Responsibility
<b>3.4. Evidence Gathering</b>	The Council forms an ad-hoc <b>Ethics Review Committee (ERC)</b> , which may include external, independent experts. The ERC gathers evidence from the complainant, the accused member, and relevant third parties.	Ethics Review Committee (ERC)
<b>3.5. Right to Reply</b>	The accused member is formally given the <b>Right to Reply</b> , providing them with all non-confidential evidence and a fixed period (e.g., 30 days) to submit a comprehensive defence and remedial action plan.	ERC
<b>3.6. Review and Finding</b>	The ERC reviews all evidence, defenses, and remedial plans, and submits a confidential report with a finding (Breach Confirmed/Not Confirmed) and a recommended sanction to the full Governing Board.	ERC

### Phase 3: Decision and Sanction (Council)

Step	Action	Responsibility
<b>3.7. Final Decision</b>	The Council reviews the ERC report and votes on the final decision, which must be clearly documented. Possible outcomes include: <b>No Action, Formal Warning (with required remedial action), Temporary Suspension, or Permanent Exclusion.</b>	Council
<b>3.8. Communication</b>	The Secretariat formally communicates the final decision and rationale to the accused member. If a sanction is applied, the communication will outline the terms of the sanction (duration, required actions for reinstatement).	Secretariat
<b>3.9. Post-Sanction Action</b>	For Permanent Exclusion or severe breaches, ENoLL may inform the wider community (without breaching privacy) that an organization has been excluded due to a breach of the Code of Conduct, as deemed necessary for transparency and protection of the Network's reputation.	Secretariat / Council