



OFFICE OF COMPLIANCE SERVICES
UVM.EDU/POLICIES

POLICY

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Title: Code of Conduct and Ethical Standards

Policy Statement

The University of Vermont is committed to continually strengthening its ethical culture. From the University's motto of "Studiis et Rebus Honestis" (Integrity in Theoretical and Practical Pursuits) to our values stated in "Our Common Ground", we are all expected to perform our jobs and to conduct business in an ethical and compliant manner. All University personnel have a shared responsibility to the University, to those we serve, to our community and to each other.

Reason for the Policy

This Code of Conduct and Ethical Standards ("Code") is a tool to help you comply with legal and regulatory requirements and with University policies and procedures. The Code is designed to help you make ethical choices when and if you are faced with a difficult decision or situation. The intent of this Code is to communicate the principles and standards that have been identified as most relevant to the University's stated values and to your compliance program recognizing that UVM's policies and procedures extend beyond those identified in this Code.

Applicability of the Policy

This Code applies to all University of Vermont personnel. For the purpose of this Code, personnel includes, but is not limited to, faculty, staff, volunteers, student employees, and individuals hired or contracted to perform a function that is generally associated with an employment relationship (i.e., temporary employee, student employees).

Definitions

Bad Faith Report: A report that is made to deceive, is dishonest, knowingly untrue or otherwise intentionally misleading.

Confidential Information: Any non-public information pertaining to the University's business.

Good Faith Report: A report that made with a sincere belief that the issue is occurring, has occurred or there is a likelihood that it could occur. There is no malice or desire to defraud others.

Personnel: For the purpose of this Code, University Personnel refers to faculty, staff, volunteers, student employees, and individuals hired or contracted to perform a function that is generally associated with an employment relationship. Examples include temporary

employees, graduate students receiving stipends, and contractors or other third parties serving in an employee capacity.

Retaliation: Taking action to harm someone in response to a report.

Retribution: The act of taking revenge.

Student Employees: This includes undergraduate and graduate students that are paid by the University for performing a function generally associated with an employee function. Student employees include, but not limited to, Graduate Teaching Assistants, Graduate Research Assistants, Graduate Assistants, Undergraduate Student Employees, and Post-Doc Associates. Pre-Doc and Post-Doc Fellows are not considered student employees.

Whistleblower: Someone who informs on a person or organization that they have reason to believe is engaged in an unethical, non-compliant, illicit or illegal activity.

Procedures

The Office of Compliance and Privacy Services is responsible for the oversight of the University's compliance program; however, as University personnel we are all individually responsible to be aware of and comply with the legal and regulatory requirements and with University policies and procedures relevant to our jobs. In addition to this Code, certain professions have ethical standards or professional codes of conduct which members of those professions are also expected to comply with. Examples include, but are not limited to, the American Medical Association's Code of Medical Ethics and the American Bar Association's Model Rules of Professional Conduct.

Under this Code, reporting all types of wrongdoing is encouraged. Depending on the alleged violation, there may be mandatory reporting requirements (for example, see [Protection of Minors](#) and [Designation and Responsibilities of UVM Reporters](#)). If not required by a regulation, you may feel a moral obligation to report. For the purpose of this policy, "wrongdoing" is defined as:

- Real or suspected violations of legal and regulatory requirements (laws, acts, statutes, regulations), policies and procedures and/or professional standards.
- Fraudulent or dishonest conduct resulting in violation of law or University policy.

Not all reports have to be related to wrongdoing. You may also use any of the compliance reporting mechanisms if you need guidance or clarification on a policy or procedure, if you have questions related to a University process designed to comply with a legal or regulatory requirement or if you are looking for assistance or have questions when faced with an ethical decision or dilemma.

Compliance Reporting System:

The University has established a robust compliance reporting system made up of several reporting mechanisms. For more information on available reporting mechanisms, review the [Whistleblower Policy: Reporting, Protections, & Non-Retaliation](#) ("Whistleblower Policy"). The Whistleblower Policy outlines the different mechanisms for reporting, including the Compliance and Ethics Reporting and HelpLine ("HelpLine"). Other University Policies that have reporting requirements will include the preferred methods of reporting that should be followed. If a policy is silent to reporting requirements, or if anonymity is requested and anonymity is not provided by other reporting channels, reports may be made through the HelpLine.

For reports that are made directly to a manager or supervisor, the manager/supervisor is required to notify the Director of Compliance Services or the Office of General Counsel when the

manager/supervisor suspects there may be a violation to legal or regulatory requirements or fraudulent activity may have occurred. Managers/Supervisors are encouraged to seek the advice of the Office of Compliance and Privacy Services as soon as possible when they receive reports of alleged noncompliance to a legal or regulatory requirement.

Reports made through the HelpLine are received and screened through a third-party vendor. While some other University reporting mechanisms may accept anonymous reports, the best reporting method for maintaining the anonymity of anonymous reports is the HelpLine. Regardless of the reporting mechanism used, all reports are kept as confidential as possible. However, anonymity can never be guaranteed. For more information on anonymous reporting, refer to the HelpLine [FAQ](#).

Non-Retaliation:

The University prohibits retaliation or retribution for a good faith report, for supporting a person who files a good faith report, and for participating in an investigation of a report. Individuals making bad faith reports are not afforded these protections. The University has adopted the following Policy which outlines its non-retaliation policies: "[Whistleblower Policy: Reporting, Protections & Non-Retaliation](#)". Prohibited retaliation may result in discipline up to and including discharge from employment independent of the outcome of the reported wrongdoing.

Disciplinary Action:

If wrongdoing has been substantiated, those individuals found to have participated in the wrongdoing will be subject to disciplinary action at a level appropriate for the violation. Levels of disciplinary action range from a verbal warning up to dismissal. Disciplinary action could also include termination of University institutional recognition or external affiliate relationships with the University and, depending on the University's regulatory requirements, could include civil claims and criminal charges. Investigation and determination of discipline for represented employees will occur in accordance with provisions of the applicable collective bargaining agreement.

Creating a Respectful Campus Environment:

Under state and federal statutes, it is illegal to discriminate based on race, color, national origin, religion, sex, disability, certain Veterans, age, citizenship status and genetic information. The State of Vermont also prohibits discrimination based on sexual orientation, gender identity and related characteristics, place of birth, ancestry, veteran status, HIV status, and discrimination on the basis of age as to persons 18 and older.

University Policies, University Operating Procedures (UOPs), and other guidance that contain language related to this section of the code include:

- [Accessibly Policy](#)
- [Amorous Relationships with Students](#)
- [Diversity Statement](#)
- [Equal Employment Opportunity/Affirmative Action Policy Statement](#)
- [Equal Opportunity in Educational Programs and Activities and Non-Harassment](#)
- [Discrimination, Harassment, and Sexual Misconduct](#)
- [Our Common Ground](#)

Privacy and Security of Confidential Information:

At UVM, we recognize the importance of protecting the privacy and security of confidential information. Some of this information is legally protected, and some of it is considered sensitive. Information that is non-public, personal or protected, confidential and/or sensitive ([NPPD](#)) needs to be safeguarded.

Whether UVM and its employees and affiliates are legally required to do so or if it is just the right thing to do, the University takes this responsibility very seriously and demonstrates its commitment to safeguarding NPPD through its Information Security and Privacy Programs. All persons covered by this Code have a responsibility to maintain the privacy and security of NPPD at all times. Protection of this information can greatly reduce the risk of the misuse of information or a breach.

University policies, procedures and other guidance that contain language related to this section of the code include:

- [Computer, Communication, and Network Technology Acceptable Use](#)
- [Data Breach Notification Policy](#)
- [FERPA Rights Disclosure](#)
- [Information Security](#)
- [Privacy](#)
- [Records and Documents Requests](#)
- [Records Management and Retention](#)

Conflicts of Interest and Conflicts of Commitment:

If you, or a member of your immediate family, has (or could have) a personal or financial interest that affects independent judgment as it relates to University duties OR it could result in personal gain or advancement at the expense of the University, you may have a conflict of interest. If you engage in external activities that significantly interfere with your ability to perform your UVM duties or are reasonably expected to interfere with your ability to perform your UVM duties, you may have a conflict of commitment. In both cases, the agreement, arrangement, or activity could be prohibited.

University policies, procedures and other statements that contain language related to this section of the code include:

- [Amorous Relationships with Students Policy](#)
- [Code of Academic Integrity](#)
- [Conflict of Interest and Conflict of Commitment Policy](#)
- [Contract Approval and Signatory Authority Policy](#)
- [Financial Conflict of Interest in Sponsored Research Policy](#)
- [Handling and Resolving Discrimination, Harassment, and Sexual Misconduct Complaints Procedure](#)
- [Intellectual Property Policy](#)
- [Misconduct in Research Policy](#)
- [Nepotism Policy](#)
- [Visiting Scholar/Visiting Scientist Policy](#)

Protecting University Assets and Appropriate Use of University Resources:

We all have a responsibility to make sure that University resources are not wasted or used inappropriately. Stealing, committing fraud, bribing, and providing kickbacks are all examples of inappropriate use of University resources and are all violations of the law, University policy and this Code. We must all do our part to protect University resources.

University policies, procedures and other statements that contain language related to this section of the code include:

- [Business Meal, Hospitality, and Amenity](#)
- [Computer, Communication, and Network Technology Acceptable Use](#)
- [Contract Approval and Signatory Authority](#)

- [Events, Speakers, and Activities - Facilities & Grounds Use](#)
- [Purchase or Lease, Contract Approval, and Signatory Authority of Goods and Services](#)
- [Travel](#)

Accuracy in Recordkeeping:

The University has an obligation to ensure the trust of the public and other stakeholders through its financial and regulatory reporting. This includes ensuring the accuracy and timeliness of our records and reports. Submitting false information on a timesheet or expense report is stealing. Knowingly including false financial information in a report to the government is fraud. It is imperative for all of us to be honest and truthful in all records we maintain as part of our work duties.

University policies, procedures and other statements that contain language related to this section of the code include:

- [Business Meal, Hospitality and Amenity](#)
- [Effort Management and Reporting on Sponsored Agreements](#)
- [Export Controls](#)
- [I-9](#)
- [Movable Equipment](#)
- [Records Management and Retention](#)
- [Travel](#)

Relationships with University Vendors and Other Third Parties in Business Transactions:

Personnel are expected to deal fairly with vendors and other third parties UVM conducts business with. No unfair advantage shall be taken of prospective or current vendors through manipulation, concealment, abuse of privileged information, misrepresentation of material fact or any other unfair practice. Additionally, all procurement policies and guidance must be followed to provide for a fair, impartial and inclusive selection process.

- [Affiliated Organizations](#)
- [Purchase or Lease, Contract Approval, and Signatory Authority of Goods and Services](#)

Research:

At the University, the scope of research is broad and diverse. While research activities are an integral part of the University, it is also an area that is heavily regulated and, as such, poses significant compliance risks. Ethics are fundamental to all academic research. Without ethics and trust, a complex, modern research institution cannot function. Researchers must be aware of the ethical standards governing their discipline and to avoid even the appearance of impropriety.

University policies, procedures and other statements that contain language related to this section of the code include:

- [Administrative Policy for Sponsored Project Administration Procedures](#)
- [Conflict of Interest/Conflict of Commitment](#)
- [Copyright](#)
- [Cost Transfers Involving Sponsored Agreements](#)
- [Effort Management and Reporting on Sponsored Agreements](#)
- [Export Controls](#)
- [Financial Conflict of Interest in Sponsored Research](#)
- [Intellectual Property](#)
- [Misconduct in Research](#)

- [Movable Equipment](#)
- [Sponsored Project Administration \(SPA\) Website](#)
- [Use of University Research Facilities and Equipment by External Parties](#)
- [Visiting Scholar and Visiting Scientist](#)

Freedom of Expression:

While our mission is dedicated to free expression and facilitation of the exchange of ideas, we need to balance that with our need to ensure that University endorsement is not improperly attributed, and that University resources and facilities are used in a manner consistent with policy and campus safety.

University policies, procedures and other statements that contain language related to this section of the code include:

- [Copyright](#)
- [Free Expression; Campus Speakers; Response to Disruption](#)
- [Political Engagement, Advocacy, and Campaign Related Activities](#)
- [Posting and Solicitation](#)
- [Trademarks](#)
- [University Name, Symbols, Letterhead and other Proprietary Indicia of Affiliation](#)
- [University-Sponsored Social Media Guidelines](#)

Creating a Safe and Healthy Campus:

A safe and healthy campus refers to both environmental safety (e.g., buildings, grounds) and personal safety. When it comes to a safe and healthy campus, we are all equally responsible for how we behave as well as how we treat others. If you ever feel unsafe or if you see or hear about unsafe conditions on campus or in your workplace, let someone know. See [UVM's Unified Campus Reporting Portal](#) for a list of reporting types and contact information.

If you ever feel that you are in immediate danger, call 9-1-1 or report via the [CATSafe app](#).

University policies, procedures and other statements that contain language related to this section of the code include:

Personal Safety:

- [Alcohol, Cannabis, Tobacco, and Other Drug Use - Faculty and Staff](#)
- [Alcohol Service and Consumption at University Activities – Faculty and Staff](#)
- [Campus Safety and Security: Clery Act](#)
- [Designation and Responsibilities of UVM Reporters](#)
- [Discrimination, Harassment, and Sexual Misconduct](#)
- [Minors in Laboratories](#)
- [Minors; Reporting of Abuse or Neglect of and Crimes](#)
- [Personal Safety and Threat Assessment](#)
- [Protection of Minors](#)
- [Weapons](#)

Environmental Safety:

- [Emergency Management and Continuity of Operations](#)
- [Fire Safety](#)
- [Laboratory Health and Safety](#)

Resources:

While the Office of Compliance and Privacy Services oversees the University’s compliance program, there are other offices and individuals that can provide guidance when faced with a difficult decision or situation.

- [Chief Safety and Compliance Officer](#)
- [Faculty Senate](#)
- [Human Resource Services](#)
- [Office of Audit Services](#)
- [Office of General Counsel](#)

In addition to the above listed resources, the University also offers these resources depending on the issue or your needs:

- [Disability Certification and Support](#)
- [Division of Diversity, Equity, and Inclusion](#)
- [Office of Equal Opportunity](#)
- [Office of International Education](#)
- [Risk Management](#)
- [Environmental Health & Safety](#)
- [Sponsored Project Administration \(SPA\) and Research Integrity](#)
- [Student Financial Services](#)
- [University Financial Services](#)

Contacts

Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):	
Title(s)/Department(s):	Contact Information:
Director of Compliance Services and Chief Privacy Officer, Office of Compliance and Privacy Services	(802) 656-3086 compliance@uvm.edu

Forms/Flowcharts/Diagrams

- None

Related Documents/Policies

- [Employee Handbooks and Collective Bargaining Agreements](#)
- [President’s Ethics Statement](#)
- [UVM Institutional Policy Website](#)

Regulatory References/Citations

- None

Training/Education

Training/education related to this policy is as follows:

Training Topic:	Code of Conduct and Ethical Standards Awareness Training		
Training Audience:	All UVM Employees	Delivered By:	Office of Compliance & Privacy Services
Method of Delivery:	On-Line	Frequency:	Upon Hire

About this Policy

Responsible Official:	President	Approval Authority:	President
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University of Vermont Policies and Operating Procedures are subject to amendment. For the official, approved, and most recent version, please visit UVM's [Institutional Policies Website](#).