

Employee Code of Conduct

POLICY:

Utica University employees are expected to conduct themselves ethically, honestly, and with integrity in all dealings. They need to be fair and principled in their official interactions both within and outside the Utica University community. They must act with due recognition of their position of trust and loyalty with respect to the University and its students, fellow employees, research sponsors, and donors. When in doubt about the propriety of a proposed course of action, they must seek counsel from those colleagues, supervisors, or administrators who can assist in determining the right and appropriate course of conduct.

SCOPE:

Utica University expects all employees, including student employees and contractors hired by the University, to comply at all times with the principles in this code. A violation of this code may be grounds for disciplinary action up to and including termination.

REASON FOR POLICY:

The purpose of this policy is to deter wrongdoing and promote honest and ethical conduct while complying with applicable governmental laws, rules, and regulations. This policy identifies general standards concerning ethical conduct and provides guidance to ensure that University employees maintain the highest standards of business and professional ethics as they conduct business and provide education and support services on behalf of the Utica University community.

PROCEDURE:

1. Proper Use of University Property and Funds

Utica University employees must see to it that University resources are not used for anything other than their intended purposes. University employees have an obligation to manage the institution's resources prudently, with a responsibility to those who provide those resources, including students, parents, alumni, foundations, other donors, partners, and government agencies. Employees are responsible for safeguarding the tangible and intangible assets of the University that are under their control. University resources may not be converted to personal use, either for oneself or for another person.

2. Accuracy of Records and Reporting

The records, data, and information owned, used, and managed by the University must

be accurate and complete. The accuracy and reliability of reports are of the utmost importance to the operations of the University. Employees must record, allocate, and charge costs accurately and maintain supporting documentation as required by established policies and procedures. All reports, vouchers, bills, invoices, payroll information, personnel records, and other essential business records must be prepared with care and honesty.

3. Grants and Contracts

Employees requesting and providing information regarding funding from government agencies, corporations, foundations, and other granting organizations have an affirmative obligation to make full, accurate, and honest representations concerning all relevant information submitted to or requested by the granting organization. Accurate and complete records must be maintained, including supporting documentation as required by the granting organization, of the uses to which grant funds are put.

4. Confidential Information

Employees may be privy to confidential information in the course of their daily work. This information may relate to, among others, students, parents, alumni, donors, employees, partners, and candidates for positions on the faculty or staff. All University employees must safeguard confidential information. This includes insuring that confidential documents, in either paper or electronic form, are not left unattended; refraining from engaging in discussion of confidential information in forums where the information may be overheard; and protecting the privacy of past and current students, faculty, and staff by maintaining the confidentiality of student and employee records.

5. Conflicts of Interest

A conflict of interest is defined as the existence of a situation where an employee's position or authority may be used to influence or make decisions in a way that would lead directly or indirectly to financial or personal gain for the employee or for their family; or whose activities would adversely affect the individual from fulfilling the requirements of their position.

Employees should avoid conflicts of interest that might compromise the integrity and objectivity of the University. Examples of situations involving potential conflicts of interest include working for the University as an outside vendor; using information that the University considers privileged or confidential for the benefit of a person or entity outside the University; utilizing discounts allowed to the University for personal gain; soliciting for oneself or for a third party anything of value from any person or entity in return for any business or service provided by the University; and working for another college or university without express written approval by the president or the appropriate senior vice president/vice president.

Conflicts of interest may also exist where:

- A University supervisor has an additional financial or other relationship with their employee, such as employing the employee in an off-campus job, acting as the employee's landlord, or being the employee's child, parent, spouse, or partner; or
- A University faculty member who is an instructor or advisor to a student also has a financial or other relationship with one of their students or advisees, such as employing the student in an off-campus job, acting as the student's landlord, or being the student's child, parent, spouse, or partner.

Such potential conflicts of interest should be avoided where possible, and must be declared to the relevant supervisor or school dean.

Financial conflicts of interest (for example, an employee's participating in the ownership or management of an entity that regularly does business with the University) must be disclosed to the Office of the Vice President for Financial Affairs and Treasurer for review. No member of the faculty or staff may approve, recommend, or promote a business transaction with a firm in which that person is an officer or senior management employee, or holds more than a five percent equity interest, unless such person first discloses in writing the business relationship and the circumstances of the contemplated activity.

6. Gifts and Gratuities

No employee shall solicit anything of value in return for influencing or exercising their discretion in a particular way on a University matter. Employees should not accept any material gift, gratuity, or other payment, in cash or in kind, from a vendor currently doing business with the University or seeking to do so. Employees may not separately negotiate on their own personal behalf. This includes soliciting, or receiving discounts or rebates on goods and services offered to them in their private capacity by vendors to the University that exceed those generally available to other customers. Offers of free trips or extraordinarily generous offers on the part of the vendor should be politely but firmly declined.

Exceptions to this general provision include unsolicited gifts of a nominal value, generally speaking, no more than \$25 per person, given at holidays, birthdays, weddings, and other commonly recognized social occasions.

As agents of the University, employees are expected to protect their own reputations as well as that of the University. Employees must take extreme care to avoid even the slightest appearance of unethical behavior.

7. Antitrust

Employees may not improperly collude with other entities, including other colleges and universities, in matters affecting the financial or administrative decisions of the University.

8. Compliance with Laws and Regulations

Employees are expected to transact University business in compliance with all federal, state, and local laws and regulations related to their positions and areas of responsibility, including, but not limited to, equal employment opportunity, fair employment practices, and nondiscrimination laws; laws regarding the privacy and confidentiality of employee and student records; and laws regarding workplace safety, workplace policies and regulations, and occupational health. Employees whose programs operate internationally are expected to comply with the laws of the nations in which those programs operate, including foreign corrupt practices acts.

9. Obligation to Report Suspected Violations

Employees are obligated to report suspected violations of these standards promptly to their supervisor, department chair, the Vice President for Human Resources and Personnel Development, their school dean, or another Vice President. Any University employee to whom a report of a suspected violation is made is obligated to follow up the report with the appropriate administrative authority. In investigating claims of inappropriate activities, care will be taken to maintain confidentiality. Utica University will protect from retaliation anyone who makes a good faith effort to appropriately disclose perceived wrongdoing. However, the University reserves the right to distinguish between retaliation and ongoing performance management related to the individual (see [Reporting Suspicious Financial Activity Policy](#))

10. Consequences of Violation

Violations of this code or related University policies and procedures will be considered under the University's established disciplinary practices and procedures for employees and may carry disciplinary consequences, up to and including dismissal from employment. Such violations may also subject individuals to civil or criminal actions in state or federal courts.

11. Supervisor's Obligations

Individuals who supervise others should ensure that their direct reports have received adequate instruction and explanation with respect to their obligations under this code.

RESPONSIBILITY:

It is the responsibility of all Utica University employees to abide by this code of conduct in order to maintain an ethical and honest University community. It is also the responsibility of all Utica University employees to report any misconduct regarding University business.

ENFORCEMENT:

Enforcement of Utica University policies is the responsibility of the office or offices listed in the “Resources/Questions” section of each policy. The responsible office will contact the appropriate authority regarding faculty or staff members, students, vendors, or visitors who violate policies.

Utica University acknowledges that University policies may not anticipate every possible issue that may arise. The University therefore reserves the right to make reasonable and relevant decisions regarding the enforcement of this policy. All such decisions must be approved by an officer of the University (i.e. president, vice president for academic affairs, or vice president for financial affairs).

RESOURCES/QUESTIONS:

For any questions or additional information, please contact the [Office of Human Resources](#).

Please note that other Utica University policies may apply or be related to this policy. To search for related policies, use the Keyword Search function of the online policy manual.

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