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| <b>Policy:</b> Code of Ethics           | <b>Policy Number:</b> I-6.16     |
| <b>Policy Owner(s):</b> Human Resources | <b>Original Date:</b> 03/10/2006 |
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**I. POLICY:**

All employees, students, and any other person acting on behalf of the University are responsible for acting in an ethical and lawful manner, consistent with the University’s mission, vision and core values, this Code of Ethics and the University’s policies. University leaders – including supervisors, deans, department chairs, and others in leadership or supervisory positions - must ensure that their conduct and their leadership of areas that they oversee are ethical and lawful and comply with this Code of Ethics.

**II. PURPOSE:** This University Code of Ethics is a statement of ethical, legal and professional behavior in all dealings related to the University. This Code reflects the University’s well-established policies and principles governing the behavior of employees when working for or otherwise participating in University activities. The Code of Ethics is intended to function as a useful summary of ethical principles and to emphasize the importance of observing these principles. This Code incorporates the ethical and behavioral standards set forth in many separate University policies and principles, as well as applicable laws.

**III. SCOPE:** All John Carroll University employees.

**IV. GUIDELINES:**

**A. Ethical, Lawful and Professional Conduct.** All employees are expected to conduct all University business and related professional activities in an ethical, lawful and professional manner. Employees of the University community are expected to act in good faith and with fairness, accuracy, integrity, and respect for others.

1. Employees who serve in a position of trust in relation to the University’s finances, donations, outside funding sources, its students, or supervisory duties should recognize their position of trust with respect to the University, and its students, employees, research partners or sponsors, and donors.

2. Additionally, employees are expected to comply with codes of ethics specific to their profession.
  3. When in doubt about the propriety of a proposed course of action, the individual should seek counsel from department heads, supervisors, or senior University leaders who can assist in determining the right and appropriate course of action.
- B. Respect for Others.** The University embraces diversity as a core value and is committed to the principle of non-discrimination and a campus culture that reflects a fundamental respect for all members of the University community. The University does not tolerate discrimination or harassment on the basis of race, age, color, sex, sexual orientation, religion, ethnic or national origin, disability, military or veteran status protected under federal law, or genetic information. The University does not tolerate harassment – whether in person or via electronic means - by any member of the University community.
- C. Conflicts of Interest and Commitment.** A conflict of interest occurs when a member of the University community is in a position to influence a decision on policy or on University purchases where the individual might directly or indirectly receive financial benefit or give improper advantage to others.

A conflict of commitment arises when an employee's involvement in outside activities substantially interferes with their commitment to the University.

1. All employees of the University are expected to comply with the University's Conflict of Interest policy.  
<https://drive.google.com/file/d/1SdHGuTkewkNgl-1q5rgV7sc4KafWsJ-6/view?usp=sharing> . As provided in that policy, all University employees are required to complete an annual conflict of interest questionnaire and disclosure, and to report any new conflicts as they arise. The University will review any disclosed conflicts and determine appropriate management plans or resolutions to address any conflict of interest.
  2. Employees of the University are expected not to engage in outside activities that would create a conflict of commitment with required work duties and use good judgment, professional commitment and ethics to protect themselves and the University from potential conflicts of interest or commitment.
- D. Compliance with Laws and Regulations.** The University is subject to numerous laws and regulations that govern the various activities of the University as an employer, government contractor and institution of higher education. All employees are expected to be aware of the federal, state and local laws and regulations that apply to their activities and conduct themselves in compliance with such laws and regulations.

1. Noncompliance, even when inadvertent, can have serious consequences to the members involved and the University, including civil liability, loss of funding, reputational harm and, in extreme cases, criminal prosecution or sanctions.
  2. Questions about the interpretation or applicability of law or regulations should be directed to the University's Office of Legal Affairs.
- E. Compliance with Policies and Procedures.** All employees are expected to familiarize themselves with and follow applicable University policies and procedures. Each employee of the University also is expected to follow the policies and procedures enacted by their academic or administrative unit. Questions about a specific policy or procedure should be directed to the individual or office responsible for oversight of that policy or procedure.
- F. Authority to Commit the University and Compliance with Agreements.** In the ordinary course of its business of education and research, the University enters into various agreements, such as contracts, grants, licenses, gifts, purchase orders, and other binding obligations. Entering into an agreement by the University, including sponsored research funding, creates a legal obligation on the part of the University to comply with the terms and conditions of that agreement or award, including applicable laws and regulations.
1. Only individuals who have authority delegated by an appropriate University official are authorized to enter into agreements on behalf of the University.
  2. All employees are expected to act in good faith and adhere to all agreements and other binding obligations undertaken by the University.
  3. Employees involved in research activities sponsored by federal, state or local agencies or entities must strictly adhere to all grant or contractual obligations (including adhering to applicable federal, state or local laws and regulations) related to those activities.
- G. Appropriate Treatment of Confidential and Private Information.** Employees may have access to confidential, proprietary or private information of various types, including student records, employee records, University business information, personally identifiable information, intellectual property and other information subject to contractual or legal obligations of confidentiality. All employees must follow all applicable legal, contractual and policy restrictions on the use, disclosure and safeguarding of such information, including but not limited to educational records protected by the Family Educational Rights and Privacy Act (FERPA) and personal health information under the Health Insurance Portability and Accountability Act (HIPAA).
- H. Appropriate Use of University Resources and Accurate Financial Reporting.** As a not-for-profit educational institution, University resources

are reserved for University business purposes. Therefore, all employees are expected to ensure that University resources, such as funds and other property, are used appropriately for the benefit of the University and in compliance with applicable laws and regulations and University policies and procedures.

1. When required by their job responsibilities, employees of the University must record, allocate, document and/or report revenue, expenditures, time, effort, and other information in an accurate, complete and timely manner.
  2. All entries in University's records, including departmental accounts and individual expense reporting, must accurately reflect each transaction.
- I. **Reporting Suspected Violations.** All employees have the responsibility to report suspected violations of this Code of Ethics, as well as any suspected violation of applicable law or regulation, contractual obligation of the University, or University policies.
1. Employees are encouraged to report suspected violations to their supervisor or department head, or to appropriate University officials designated in the applicable University policy. For example, suspected violations of the Sexual Harassment and Interpersonal Violence Policy are to be reported to the University's Title IX Coordinator or any Deputy Title IX Coordinator.
  2. Any individual who prefers may file a report (either anonymously or not) through the University's Ethics Reporting Hotline at <https://secure.ethicspoint.com/domain/media/en/gui/13783/index.html> or, if applicable, through the University's Bias Reporting System at <http://sites.jcu.edu/bias/> or through the Title IX reporting form at <https://www.jcu.edu/offices-and-services/title-ix/>.
  3. A report of a suspected violation is a service to the University and will not in itself jeopardize employment with the University. No person who makes a good faith report of a suspected violation will be reprimanded or retaliated against in any way.
- J. **Consequences of Violations.** Violations of this Code of Ethics, any applicable law or regulation, any contractual obligation of the University, or any University policy or procedure will be investigated and may result in disciplinary or other appropriate actions, up to and including termination.

**V. CROSS REFERENCE:**

Conflict of Interest Policy  
Contract Approval and Signatory Policy  
Corrective Action Policy  
Faculty Handbook  
Information Technology Resources Policy  
Mandatory Reporting Policy  
Non-Discrimination Policy  
Non-Retaliation Policy  
Policies for an Inclusive Environment  
Sensitive Data Policy  
Sexual Harassment and Interpersonal Violence Policy