Real expectations.

Code of Conduct

Open Forum
overview

Why do we need a code?

Development process

Code of conduct best practices

Features of our code

Tour and Q & A
why do we need a code?

Purpose: A code of conduct should “contain and explain the behavioral expectations that an organization holds for its employees and agents.”

~Ethisphere Institute
why do we need a code?

To merge multiple resources into one unified Code of Conduct for easy reference

- Code of Ethics
- VCU Creed
- Code of Conduct for Business Practices
- Policies and procedures
- Various VCU websites
- Internal contacts
why do we need a code?

To clearly articulate existing expectations

- Summarize our policies, ethical standards and values
- Provide resources for additional guidance
- Ensure understanding that all employees are responsible for meeting VCU’s expectations
development process

Researched best practices

Identified goals and objectives

Drafted our Code of Conduct

Reviewed by key stakeholders

Revised draft

Benchmarked our Code

Gathering feedback from all employees
development process

Researched best practices

- Other corporate and academic codes of conduct
  - Codes graded an “A” or above by ETHISPHERE
  - Peer institutions
- Recommendations from consulting agencies
- Code of Conduct whitepapers
## best practices

<table>
<thead>
<tr>
<th>Public Availability</th>
<th>Online availability, ease of access, downloadable and print friendly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tone from the Top</td>
<td>Letter from the president and support of senior leadership</td>
</tr>
<tr>
<td>Readability &amp; Tone</td>
<td>Between 8,000 – 10,000 words (our Code is 8,100)</td>
</tr>
<tr>
<td></td>
<td>Welcoming tone that is not overly formal and refrains from legal jargon</td>
</tr>
<tr>
<td></td>
<td>Readable by all employees at every level</td>
</tr>
<tr>
<td>Non-Retaliation &amp; Reporting</td>
<td>Reporting options for actual or perceived violations of the code are outlined</td>
</tr>
<tr>
<td></td>
<td>Commitment non-retaliation for good-faith reports</td>
</tr>
<tr>
<td>Values &amp; Commitments</td>
<td>Expresses commitment to core values to all stakeholders (including employees, students, vendors and local communities)</td>
</tr>
<tr>
<td>Risk Topics</td>
<td>Address all of the core risk areas</td>
</tr>
<tr>
<td>Comprehension Aids</td>
<td>Learning tools are provided within the Code, such as Q&amp;As, FAQs and examples</td>
</tr>
<tr>
<td>Presentation &amp; Style</td>
<td>Organized and presented in an easy-to-follow fashion</td>
</tr>
<tr>
<td></td>
<td>Aesthetically appealing and logically organized with a Table of Contents and Index</td>
</tr>
</tbody>
</table>
Researched best practices

Identified goals and objectives

Drafted our Code of Conduct

Reviewed by key stakeholders

Vetted through Culture Subcommittee

Revised draft

Benchmarked our Code

Gathering feedback from all employees
development process

Identified goals and objectives

- Create a user friendly reference tool
  - Clarify and summarize expectations
  - Provide examples
  - Provide learning aids and tools
  - Link to resources for more information
  - Intuitive organization
  - Online “living” document that can easily be updated
development process

- Researched best practices
- Identified goals and objectives
- Drafted our Code of Conduct
- Revised draft
- Vetted through Culture Subcommittee
- Reviewed by key stakeholders
- Benchmarked our Code
- Gathering feedback from all employees
development process

Vetted through CAC Culture Subcommittee

- Identified topics
- Gathered feedback
- Created an outline

First draft
development process

- Researched best practices
- Vetted through Culture Subcommittee
- Reviewed by key stakeholders
-Benchmarked our Code
- Identified goals and objectives
- Drafted our Code of Conduct
- Revised draft
- Gathering feedback from all employees
development process

Draft reviewed by key stakeholders

- Collected feedback from:
  - Compliance Advisory Committee
  - Senior leadership including
    - General Counsel
    - President

- Incorporated suggestions

- Revision reviewed by senior leadership
development process

- Researched best practices
- Identified goals and objectives
- Vetted through Culture Subcommittee
- Drafted our Code of Conduct
- Reviewed by key stakeholders
- Revised draft
- Benchmarked our Code
- Gathering feedback from all employees
development process

Code benchmark performed by corpedia

VCU’s Draft Code of Conduct Overall Grade

Overall Grade
Risk Areas
Readability & Tone
Tone from the Top

Corpedia’s Code Database  Education Industry  Virginia Commonwealth University

#1 reviewed code in education industry
development process

- Researched best practices
- Identified goals and objectives
- Vetted through Culture Subcommittee
- Drafted our Code of Conduct
- Reviewed by key stakeholders
- Revised draft
- Benchmarked our Code
- Gathering feedback from all employees
organization & key features

ethical behavior
we are committed to an environment of uncompromising integrity and ethical conduct

our culture
we are committed to a civil and professional working environment

expectations
we are committed to employee conduct consistent with our mission and values

further guidance & resources
we are committed to providing our employees with the tools for success
ethics decision framework

**Don't do it**

- **Is it legal?**
  - Yes
  - No
- **Could it be perceived to violate a policy?**
  - Yes/Not Sure
  - No
- **Does this decision affect you financially?**
  - Yes
  - No
- **Is it in line with all Employee Expectations?**
  - Yes
  - No

There's No Harm in Asking

If you are unsure that a decision or action meets the expectations of the law, policies or governing documents (e.g., Code of Ethics, VCU Creed), speak to your supervisor; consult a central office or the Integrity & Compliance Office; or ask a clarifying question through the VCU Helpline.

**Related policies:**
- Computer and Network Resources Use
- Leave and Time Reporting
- Maintenance and Release of Employment and Personal Information

Q&A

I would like to hire my spouse’s company to work on a project for VCU. Since it is for a legitimate business need and I can get a discounted price, is it okay to hire him/her?

No. Although the work is legitimate, this situation creates the appearance of a conflict. Disclose the circumstances to senior leadership so that an independent review can be done prior to purchase. This will help protect you, your spouse and VCU if the relationship is ever called into question.