

# Code of Conduct

**Real expectations.**

Last Revised: June 27, 2019

# letter from our president

As members of an academic learning community, we have a deep commitment to educate, innovate and inform. We are stewards of public resources and trust, and we are responsible for developing and educating people in an environment that is supportive, collaborative and safe. To achieve VCU's goals, we must always foster an environment that celebrates all aspects of, and supports all members of, our university community.

These are the values and ethical principles of Virginia Commonwealth University and the foundation of our Code of Conduct. This helps provide an environment where all individuals may thrive at all times and feel well-respected, engaged, innovative, productive and encouraged to lead by example. It is up to each of us to adhere to the values and ethical principles outlined in this code, which are central to our mission. These principles should serve as a lens for every decision.

In everything we do at VCU, we set our expectations high. Our commitment to the highest standards helps us hire great people, inspire student success, create and innovate in new ways and build a strong, loyal university community that is singularly focused on excellence.

This Code of Conduct reminds us all to demonstrate integrity in all we do. Specific university policies supplement this

guidance and, when used together, provide direction in sound decision-making. It is everyone's responsibility to know and understand our Code of Conduct, the policies that apply to our work and the resources available when clarification is needed.

This framework helps us avoid major problems that can derail progress. Many times, such problems start out as small issues that go unattended. Our objective is to foster a speak-up and listen-up culture, free of retaliation, that prevents such problems from arising by identifying and addressing them promptly and efficiently. I know I can count on your commitment to the highest ethical standards and to employing the utmost integrity in all of your decisions.

As you read our Code of Conduct, remember that each of us has a personal responsibility to incorporate, and to encourage others to incorporate, VCU's values, ethical principles and commitments into our work and into our working environment.

Sincerely,

**Michael Rao, Ph.D.**  
**President, VCU and VCU Health System**

## mission statement

Virginia Commonwealth University and its academic health center serve as one national urban public research institution dedicated to the success and well being of our students, patients, faculty, staff and community through:

- **Engaged, real-world learning that furthers inquiry, discovery and innovation**
- **Research** that expands the boundaries of new knowledge and creative expression and promotes translational applications to improve the quality of human life
- **Interdisciplinary and extra-disciplinary collaborations and partnerships** that advance innovation, enhance cultural and economic vitality, and solve society's most vexing problems
- **Health sciences** that preserve and restore health for all people, seek the cause and cure of diseases through ground-breaking research and educate those who serve humanity
- **Deeply engrained core values of diversity, inclusion and equity** that provide a safe, trusting and supportive environment to explore, create, learn and serve

## vision statement

As a preeminent national urban public research university and academic health center, Virginia Commonwealth University will be distinguished by its commitments to:

- Inclusion, access and excellence
- Innovative and transformative learning
- Impactful research
- Exceptional patient care
- Beneficial community impact

# Core Values

- **Accountability:** Committing to the efficient and transparent stewardship of our resources to achieve institutional excellence
- **Achievement:** Ensuring distinction in learning, research and scholarly pursuits, service, and patient care
- **Collaboration:** Fostering collegiality and cooperation to advance learning, entrepreneurship and inquiry
- **Freedom:** Striving for intellectual truth with responsibility and civility, respecting the dignity of all individuals
- **Innovation:** Cultivating discovery, creativity, originality, inventiveness, and talent
- **Service:** Engaging in the application of learning and discovery to improve the human condition and support the public good at home and abroad
- **Diversity and inclusion:** Ensuring a climate of mutual trust and respect where individuals of differing cultural backgrounds, identities, abilities and life experiences are embraced, engaged and empowered to drive excellence and success
- **Integrity:** Adhering to the highest standards of honesty, respect and professional and scholarly ethics

whenever you are unsure a decision or action meets expectations of the law, regulations or VCU policies, the following resources are available for guidance:

- Your immediate supervisor or department management
- The responsible individual for the related area of compliance
- The Integrity and Compliance Office
- The VCU Helpline
- University Counsel
- The VCU Ombudsperson

# table of contents

## Ethical Behavior

- 7 About Our Code of Conduct
- 8 Our Ethical Standards
- 9 Doing the Right Thing
- 10 Asking for Guidance & Voicing Concerns
- 13 Responding to Concerns

## Our culture

- 16 Our Responsibilities to Each Other
  - How we treat each other, fair employment and diversity
- 18 Your Voice Matters
- 19 Workplace Health, Safety & Security

## Expectations

- 21 Academic Expectations
- 24 Institutional Compliance
  - Compliance with laws, regulations and policies
  - Oversight responsibilities
- 26 International Presence
  - Compliance with laws in other countries
  - Anti-corruption & bribery and export controls

- 27 Fiscal Compliance & Asset Management
  - Stewardship of university/state resources
  - Procurement guidance

- 29 Interest Disclosure
  - Financial interests
  - Gifts & entertainment
  - Employment and affiliations
  - Political and personal activities
  - Avoiding the appearance of favoritism

## 35 Research Integrity

## 36 Intellectual Property & Confidential Information

## 37 Data Integrity & Privacy

## 40 External Communications

- Legal requests and government inquiries and reviews
- Media and public relations, our brand and social media

## 43 Community

## Further Guidance & Resources

- 46 Decoding Our Code
- 48 Acknowledgement
- 49 Ethical Decision Framework
- 50 Internal Contacts & VCU Helpline Numbers
- 51 Index

# ethical behavior

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

---

# about our code of conduct

## Why do we have a Code of Conduct?

Our Code of Conduct highlights some of the laws, regulations, VCU policies and ethical standards everyone is expected to follow.

Our actions shape the public's view of VCU, which is why it is so important that you take responsibility to act ethically in all situations.

Additionally, our Code helps us to identify potential issues, lists resources where you can find more information and outlines our reporting options when we have a concern. It also serves as a reminder to treat others with the utmost respect and professionalism.

Our Code, supported by the VCU Board of Visitors, the president and senior leadership, is part of our universitywide Ethics and Compliance Program. The Integrity and Compliance Office oversees our Ethics and Compliance Program with the support of the Compliance Advisory Committee.

## Who must follow our Code of Conduct?

Our Code applies to all employees including senior leadership, faculty and staff. The *Student Code of Conduct* outlines expectations for students.

Please read our Code carefully. If you have any questions, refer to the *Asking for Guidance and Voicing Concerns* section.

## Does our Code of Conduct include all laws, policies and values I should know?

Our Code summarizes many of VCU's expectations of how we conduct university business, but it does not cover every law, regulation or policy that applies to your work. It is your responsibility to know, understand and follow the rules that apply to your job.

Additionally, VCU departments/offices/schools may have more specific guidance on the topics discussed on the following pages. You can find much of that guidance on the respective area's website.



# our ethical standards

We are committed to an environment of uncompromising integrity and ethical conduct. Our ethical standards are the foundation for our decisions and actions. As members of the faculty, staff and administration of VCU, our actions are guided by these principles and values:

- Respect: We respect individuals, diversity and the rights of others.
- Honesty: We act and communicate honestly and candidly. We do not mislead others.
- Stewardship: We are good stewards of the resources entrusted to the university.
- Accountability and Responsibility: We are responsible and accountable for our decisions and actions.
- Excellence: We strive for excellence in all that we do.
- Compliance: We understand and comply with the codes, laws, regulations, policies and procedures that govern our university activities.

We recognize that our decisions and actions reflect not only upon our individual reputations but also upon the reputation of the university. Our actions are guided by these ethical principles even when confronted by personal, professional, social or economic pressures.

# doing the right thing

## Shared responsibilities

If you are unsure of the right course of action, ask yourself:

- Is it legal?
- Could it possibly violate policy?
- Does this decision affect you financially?
- How could this be perceived by others?
- Is this decision in line with all employee expectations?

If you are still unsure, consult with your supervisor, Human Resources, the department head of the related compliance area or the Integrity and Compliance Office; or ask a question through the VCU Helpline before taking action. For more information, refer the *Asking for Guidance and Voicing Concerns* section.

## Managers and supervisors have the additional responsibilities of:

- Setting clear expectations
- Leading by example
- Supporting a civil and professional working environment
- Promoting a culture where employees feel comfortable asking questions and voicing concerns
- Rewarding integrity
- Seeking help in resolving and escalating issues

To meet these goals, discuss expectations with your employees so they have knowledge to follow our Code.

Remember, it is never okay to retaliate or tolerate retaliation against any of your employees for raising concerns that they reasonably believe to be true.

# asking for guidance & voicing concerns

## Speaking up and raising concerns

Each of us is expected to voice our concerns when we are unsure of the right course of action, need advice or believe that unethical conduct may have taken place. It is the right thing to do and allows us to quickly address potential issues and manage risks.

Examples of unethical conduct—which create unnecessary risk—that you should report include actual or suspected violations of:

- Laws and regulations
- Ethical Standards
- VCU policies and procedures

### Resources:

A Practical Guide to Speaking Up  
*Duty to Report and Protection  
from Retaliation*

Additional Reporting Options

## When you have concerns, you have options

- Your immediate supervisor or department management
- The responsible individual for the related area of compliance such as:
  - Athletics
  - Audit and Compliance Services
  - Equity and Access Services
  - Human Resources
  - VCU Police
  - Procurement Services
  - Office of the Provost
  - Office of Research and Innovation
- The VCU Ombudsperson
- The Integrity and Compliance Office
- The VCU Helpline

## What happens when I voice a concern to the Integrity and Compliance Office or through the VCU Helpline?

Your concern is taken seriously and the information you share is treated confidentially to the extent possible. Concerns may be shared as necessary to investigate and resolve issues.

Additionally, every reasonable effort is made to protect the security of any personal data collected and to avoid unauthorized use or disclosure of such data.

## How do I raise concerns anonymously?

Questions or concerns may be submitted through the VCU Helpline anonymously at [www.vcuhelpline.com](http://www.vcuhelpline.com), by calling 1-888-242-6022 (from the United States) or by making a collect/reverse charge call to +1-720-514-4400 and giving the name “Virginia Commonwealth University” or “VCU” if calling from Qatar.

**FAQ: I am not certain whether what I observed or heard is unethical conduct, but something just does not seem right to me. What should I do?**

*Whenever you believe unethical conduct may have occurred, you are expected to raise the concern without unreasonable delay. It is leadership’s responsibility to look into the matter, determine how best to address it.*

### Resources:

- Confidential or Anonymous: What’s the Difference?
- ICO Helpline Review and Investigation Processes

## What is the VCU Helpline?

The VCU Helpline is a reporting mechanism hosted by a third-party vendor, Convercent, which you may use to ask questions or raise concerns. The Helpline is available 24 hours a day, 365 days a year.

If you are unsure where to go to ask a question, are uncomfortable using the other resources noted in our Code or wish to remain anonymous, you may call or use the VCU Helpline web portal. Refer to the *Internal Contacts* section for additional details.

Concerns shared through the Helpline are handled by the Integrity and Compliance Office with assistance from other areas as needed.

## What happens when I call the Helpline?

When you call the Helpline, a Convercent specialist will make a detailed summary of your question or concern.

You will then receive a unique access number and are asked to choose a password so that you may return to answer questions, provide additional information or check on the status of your report.

You also have the option to share your contact information with Convercent *only* (VCU will not see your contact information) so that you can be notified when follow-up questions or status updates are posted.

### FAQ: **Is my phone number or my computer's IP address tracked when I use the Helpline?**

*No. What you have to say is what is important. All information submitted to the VCU Helpline will remain secure and anonymous unless you choose to share your identity (in which case, the information you provide will be treated confidentially to the extent possible). Please understand that sometimes it may be difficult to fully investigate your concern if you choose to remain anonymous.*

### Resources:

- Additional Reporting Options

# responding to concerns

## Providing guidance to coworkers

If a coworker shares a concern with you and you do not have the authority to address the concern, encourage this person to have a conversation with the people directly involved; speak to a supervisor/manager; consult with the Ombudsperson for guidance on how to handle the situation; contact a compliance partner or use the VCU Helpline. Remember, you must report some incidents regardless of whether the person wishes to raise the concern or not. For example:

- Child/Adult Abuse
- Serious Injuries at Work
- Sexual Misconduct

## Management's duty to address concerns

Management has a special duty to recognize and report unethical conduct without unreasonable delay.

A written or "formal report/complaint" is not necessary to take action. Once you are aware of a potential issue, it is your responsibility to seek guidance as needed to address the concern.

The Integrity and Compliance Office is available for guidance and support for appropriately handling employee concerns related to potential unethical conduct. This office collaborates with compliance partners, such as Human Resources and the Office of University Counsel as needed.

### Resources:

- *Duty to Report and Protection from Retaliation*
- *Sexual Misconduct/Violence and Sex/Gender Discrimination*
- A Manager's Guide to Addressing Concerns: Best Practices

## Our commitment to non-retaliation

By asking a question, raising a concern in good-faith or participating in a workplace investigation, you are following our Code and doing the right thing. Retaliation (or threat of retaliation) in response to these activities is not tolerated.

Retaliation is an adverse employment action taken against an employee who raised a question or concern in good faith or participated in an investigation that would discourage a reasonable person from speaking up or sharing information about a concern. Examples include changes in work assignments or job responsibilities, unjustified negative evaluations/references, demotion or dismissal, exclusion from key meetings, and increased scrutiny/oversight of work. To learn more, please review the *Duty to Report and Protection from Retaliation* policy.

Managers should be especially mindful of taking actions that may be perceived as retaliation. Consider how the timing of decisions and well-intended actions that are meant to resolve concerns might be misinterpreted.

If you suspect retaliation in response to raising a concern or participating in an investigation, please contact the Integrity and Compliance Office immediately or share your experience through the VCU Helpline.

# our culture

we are committed to a civil and professional working environment





# our responsibilities to each other

## How we treat each other

To fulfill our mission of advancing knowledge and success, each of us is expected to treat others with dignity and respect and refrain from all forms of intimidation, harassment and discrimination. Intimidation, harassment and discrimination take many forms, including:

- Inappropriate comments, gestures or physical contact
- The display or sharing of offensive, discriminatory or sexually explicit images or literature
- Discriminatory or sexually explicit jokes or comments
- Verbal or physical abuse, including sexual assault, or threats

“We are a community that seeks to embrace and learn from one another, not simply tolerate one another.” -President Rao

By fostering dignity and respect, we uphold VCU’s core values of integrity, accountability, diversity and inclusion, collaboration, freedom, service, innovation and achievement throughout our culture.

### Resources:

- Recognize a Colleague
- Inclusive Excellence Resource Library
- Mediation and Problem Solving
- VCU: We See You
- Don't Stand By: Harassment

## Fair employment

We are committed to equal employment opportunity by providing access to education and employment without regard to race, color, religion, national origin, age, sex, political affiliation, veteran status, genetic information, sexual orientation, gender identity, gender expression or disability. This includes providing reasonable accommodation for disabilities or religious beliefs and practices.

## Diversity

We are continually guided by principles of inclusion, professionalism and respect for each other. We respect differences in all aspects of our work, study and life within the university environment.

For these reasons, we strive to recruit and retain diverse and talented students and employees who have the skills and talents to increase quality teaching and learning, high impact research and diversity at all levels.

We actively create and promote a climate of trust, honesty and integrity where all people are valued and differences are recognized as an asset.

### Resources:

- *Accessibility and Reasonable Accommodation for Individuals with Disabilities*
- *Notice of Nondiscrimination, Equal Opportunity and Affirmative Action*
- *Sexual Misconduct/Violence and Sex/Gender Discrimination*

# your voice matters

## Collaborative decision-making

When making decisions, we value the voice of all university members affected by the decision. We also value transparency in the process so there is understanding on how and why decisions are made. This ensures that we remain mission focused as we work toward common goals.

As part of this commitment, you should have timely access to information about decisions you are responsible for and decisions that impact you. Likewise, you are encouraged to take part in these conversations. This also means that you are accountable for the decisions you make and for involving the appropriate people or groups in the decision process.

**Collaborative decision-making does not mean that you will be invited to participate in every stage of the process, that the majority rules or everyone must agree. It means your thoughts will be respected and considered.**

### Resources:

- *Philosophy on Shared Governance*

# workplace health, safety & security

## Safe working conditions

You are expected to support VCU's efforts to maintain a healthy and safe workplace by:

- Following all workplace health and safety laws and university policies
- Cooperating with university members who enforce these rules
- Participating in required drills and safety training
- Reporting all accidents, injuries and unsafe practices or conditions without delay

## Drugs and alcohol in the workplace

Being under the influence of illegal drugs or alcohol negatively affects our ability to perform our jobs

safely and do our best. The unlawful or unauthorized creation, delivery, possession or use of alcohol or drugs in the workplace, on university property or as part of any university activity is not allowed.

### **FAQ: I am organizing a university event and would like to serve alcohol. Is this allowed?**

*It may be. An allowable expense for alcohol must have a clear business purpose for the function (that supports our mission). Local funds must be used and all required approvals received. See the [Alcohol and Other Drugs policy](#) for more information, including necessary forms.*

### **Resources:**

- *Alcohol and Other Drugs*
- *Safety Responsibilities*
- *Worker's Right to Know*

Having, displaying or using a weapon that is not required by your position (e.g., VCU Police Officer or food preparation personnel) while working on or off campus is never allowed. However, pepper spray is generally not considered a weapon and may be carried on campus for safety.

## Violence and weapons in the workplace

We are all responsible for promoting an atmosphere that encourages learning and productive employment. We do not tolerate threats, intimidation or violence. Threats are unacceptable regardless of whether:

- The person communicating the threat has the ability to carry them out
- The threat is made on a present, conditional or future basis
- The threat is made in person, through another person, in writing, verbally or electronically

### Resources:

- *Threat Assessment and Violence Prevention*
- What is Considered a Weapon?

# expectations

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

# academic expectations

## VCU Creed

Academic institutions exist, among other reasons, to discover, advance and share knowledge and to develop creativity and critical thinking in their students, faculty and staff. As members of the academic community, we strive to exemplify the following ideals:

- To demonstrate academic and personal integrity
- To respect the rights and property of others
- To be open to others' opinions
- To uphold academic freedom and freedom of intellectual inquiry
- To appreciate diversity and to value and learn from the uniqueness of each person
- To uphold the right of all persons to be treated with dignity and respect and to refrain from all forms of intimidation, harassment and illegal discrimination
- To demonstrate and respect intellectual courage in situations that demand it

## upholding academic integrity

Honesty, truth and integrity are values central to our mission of advancing knowledge and student success. As such, all instructors (including faculty, staff and student instructors) must uphold these values by promoting our Honor System, taking reasonable steps to prevent academic misconduct and speaking up if academic misconduct may have happened. Failure to do so detracts from our culture of trust.

## Faculty members, enjoying extensive freedoms, must reciprocate with equally high standards of academic responsibility

### Resources:

- *Academic Rights and Responsibilities*
- *Honor System*
- *Student Code of Conduct*
- *Faculty Handbook*
- Inclusive Teaching Strategies



# institutional compliance

## Laws, regulations and policies

You are expected to promote a culture of honesty, integrity and compliance with laws, regulations and university policies. By doing your part, you can mitigate risks that could diminish the vital resources and distinguished reputation of VCU, including our careers and professional reputations.

If you believe a conflict may exist between our Code of Conduct and an applicable law, regulation or policy or if you have a question concerning our expectations, speak with your supervisor or department management, the Integrity and Compliance Office or another option listed in the *Asking for Guidance and Voicing Concerns* section.

### Resources:

- VCU Policy Library

## Ethics and compliance oversight

All of us are expected to help ensure compliance and VCU's expectations are not compromised. Central offices oversee operational compliance activities in their area, and the Integrity and Compliance Office (ICO), within Audit and Compliance Services, provides independent oversight of universitywide ethics and compliance activities.

The ICO promotes a speak-up and listen-up culture to ensure the university has an effective ethics and compliance program. Accordingly, the ICO provides advisory services and resources to all employees.

**You lay the foundation for an effective ethics and compliance program by following the rules, being respectful of others, doing the right thing and speaking up when you have concerns.**

### Resources:

- Accountability Matrix
- Compliance Advisory Committee
- VCU's Ethics and Compliance Program

# international presence

## Compliance with laws in other countries

Through our campus in Qatar and partnerships with other universities and businesses, many of our activities are subject to foreign laws. In addition to following our Code of Conduct, you are expected to know and follow these laws. Contact the Office of University Counsel for guidance before taking action.

### Anti-corruption & bribery

Many countries, including the U.S., have laws prohibiting bribes to government officials. Accordingly, you must never give or offer, or appear to give or offer, anything of value to anyone for the purposes of facilitating a process or influencing a business decision.

If you are ever in a situation where you feel that you are being asked to violate these laws, immediately notify the Office of University Counsel, the Integrity and Compliance Office or the VCU Helpline.

#### Resources:

- *Compliance with U.S. Export Controls Laws*
- International Travel

### Export controls

We welcome the globalization of our community. We employ foreign persons; collaborate with international research partners; and host foreign visitors/students in connection with international exchange programs and other partnerships. As part of these activities, you must follow all applicable export control laws.

Export control laws limit certain items, software, technology and services from being sent overseas or to foreign persons in the U.S. If you are traveling abroad or are a part of any activities that may be covered by export control laws, please contact the Export Controls Compliance Office for guidance.

# fiscal compliance & asset management

## Stewardship of resources

University resources are intended to help us achieve our mission and vision. We must exercise reasonable care to ensure resources are not wasted or misused, and take advantage of opportunities for improving performance and reducing costs. Speak up if you see any misuse of resources through the appropriate communication channel listed in the *Asking for Guidance and Voicing Concerns* section. University resources include, but are not limited to:

- Equipment
- Technologies/software
- Network/electronic systems
- Records (both paper and electronic)
- Funds (both cash and cash equivalents such as checks, postage and purchasing cards)
- Facilities
- Vehicles
- Time is also a resource. During work hours, you must devote your attention to your job responsibilities.

### Resources:

- *Computer and Network Resources Use*
- *Leave and Time Reporting*
- *Maintenance and Release of Employment and Personal Information*
- *Authority to Execute Contracts and Other Documents*

## Procurement guidance

As stewards of public and university resources, we ensure that our purchases:

- Have a valid business purpose that is in line with our mission
- Are conducted in a fair and impartial manner, avoiding any impropriety or appearance of impropriety
- Are priced competitively
- Have appropriate approvals
- Are paid using correct funds
- Are delivered before approving payment

We do business with vendors who comply with the law and act in a manner consistent with our commitment to integrity and compliance. If you suspect that a vendor is not meeting these expectations, contact Procurement Services.

Before contacting vendors or making a purchase, contact Procurement Services for questions and guidance.

Resources:

- *Reimbursable Business Expenses*
- *University Business-Related Travel*
- Purchasing Procedures

# interest disclosure

We owe our primary professional allegiance to the university and our mission. Activities outside of the workplace, financial interests or receiving benefits from others can create an actual or perceived conflict between personal interests/commitments and our mission.

Situations where these interests/commitments affect or appear to affect our decisions or detract from our university responsibilities must be avoided, resolved or disclosed so they can be managed. For example:

- You, or a family member, either work for a company or have a substantial investment in a company that does or seeks to do business with VCU
- You use university time or resources for activities outside of the workplace
- You accept gifts (including paid travel, meals or events) from a company that does or seeks to do business with VCU

**Having a conflict is not necessarily wrong, but failing to disclose it is.**

## Resources:

- Interest Review Cycle/Process
- Interest Disclosure Reporting

## Financial interests

You must ensure that family members' and your financial investments do not appear to create a conflict of interest. Each of us is responsible to seek guidance prior to making an investment if you believe it may be questioned. If you have any current investments that may appear to create a conflict, it is best to promptly disclose the interest to senior leadership in your area so that it can be reviewed and, if necessary, a management plan be put in place.

Professionally managed pooled investments (e.g., index funds and mutual funds), where an individual has no control over which investments are chosen, generally do not create conflicts. However, if you are unsure, contact the Integrity and Compliance Office for clarification.

When making an investment decision, ask yourself:

- Could this investment influence any business decisions I will make?
- Could this investment appear to be a conflict of interest to anyone, such as the media?
- Do you make any business decisions at VCU that could affect your return on this investment?
- Could making this investment impact my primary allegiance to VCU?

### Resources:

- *Conflict of Interests in Research*
- *Institutional Conflicts of Interest in Research*

## Gifts and entertainment

As a VCU employee, you are a steward of the public's trust. Therefore, you must not accept gifts, gratuities, favors or rewards from third parties in exchange for performing our professional duties. Gifts and entertainment include anything of monetary value, such as discounts, travel expenses, loans, cash, services, transportation, tickets and gift certificates/cards. This includes gifts from students, family of students or potential students as well as job candidates.

Generally, awards and prizes for random drawings or contests are not prohibited. For specific guidance, contact Procurement Services.

### **We must use good judgment. Accepting gifts may create a sense of obligation or appear to bias our business decisions.**

While attending conferences and events, providing or accepting promotional items (e.g., coffee cups, pens or similar tokens), occasional meals or other non-cash items of minimal value is generally not prohibited if the gifts are allowed by law. In deciding whether a gift is appropriate, consider its value and whether public disclosure of the gift could possibly be perceived as an attempt to influence the relationship.

Additional restrictions on gifts and entertainment apply to some of our departments and individuals based on job function. You are expected to know the policies that apply to your position. If you are unsure about whether giving or accepting a gift or entertainment is permissible, discuss the situation with the Integrity and Compliance Office.

#### **Resources:**

- *Employee Ethics, Conduct and Practices Related to University Advancement and Development*
- *Acceptance and Administration of Gifts*
- *General Gift Guidelines*



## Outside employment and affiliations

Outside professional activities may appear to create a conflict of interest or a conflict of commitment. If you work for, consult with or sit on a board of a company that you (or a direct report) do business with as part of your role at VCU, you must disclose this to senior leadership in your area. Further, you must disqualify yourself from participating in related business transactions.

Faculty members are encouraged to engage in activities beyond their regular university duties when such activities contribute to individual growth, extend knowledge or advance the mission of the university. To help avoid harms resulting from a conflict of interests, you must receive written permission beforehand.

## Hiring employees or students for external activities

Hiring employees or students for services outside of the university, or to perform work for your external business, may create a conflict and should be discussed beforehand.

## Employment and affiliations of family members

You must also disclose if a family member works for a company that does business with you (or your direct report) as part of employment activities at VCU, so that the conflict may be managed. You must not participate in further transactions without written permission from senior leadership.

**FAQ: Our department would like to hire an employee in another department as an independent contractor to work on a project for VCU. Since it is for a legitimate business need (and I think I can get a discounted**

*No. Virginia law prohibits employees from having a contract with VCU in addition to their contract of employment. Other payment arrangements might also create the appearance of a conflict. Disclose the circumstances to senior leadership and Procurement Services or the Integrity and Compliance Office so that an independent review can be done prior to hiring an employee to work on the project.*

### Resources:

- *Conflict of Interests in Research*
- *Outside Professional Activity and Employment, Research and Continuing Education*

## Personal activities

While you are encouraged to participate in community and charitable activities, you must not represent your personal opinions as those of VCU or impose your personal beliefs or opinions on your coworkers. Further, you must not engage in solicitation at work, which includes:

- Selling or promoting products, goods or services
- Use of staff and faculty listings for the purpose of selling/promoting goods and/ or services
- Seeking contributions or pledges, including the distribution of printed materials
- Conducting membership drives

## Political activities

Many of us have opinions on political issues and support political candidates and parties. You must conduct these activities on your own time and without using university resources. For a list of university resources, please see the *Stewardship of University/State Resources* section.

You are a representative of VCU. Conduct outside the workplace can affect perceptions of the university, our brand and our coworkers.

**FAQ: I would like to request that employees give optional donations or volunteer their time to a local charity. Is this okay?**

*No. While we respect your personal involvement in the fundraiser/activity, we do not permit soliciting our employees or resources for non-university sponsored charities/events. VCU Charities are linked below.*

**Resources:**

- *Reservation and Use of Space*
- VCU Charities

## Avoiding the appearance of favoritism

Favoritism is the practice of giving special treatment or unfair advantages to a person or group. When an employee has influence over employment or employment activities of a family member or student, it can lead to the perception that favoritism exists. Favoritism includes, but is not limited to:

**Consenting relationships between employees or employees and students:** You must not engage in consensual relations with a student or another employee if you are in a position to influence the academic or employment activities of the individual

**Nepotism:** You must not hire, supervise or be in a position to influence the employment activities of an immediate family member. Hiring relatives in any position that you have even an indirect authority over is discouraged to avoid or minimize misunderstandings

If you have influence over academic or employment activities of an immediate family member, or person with whom you have a consenting relationship, you must immediately report the situation to your supervisor or department management to provide notice and manage this conflict.

## Favoritism is not the same as recognition and opportunities earned for high performance.

Employees who go above and beyond to earn the confidence and trust of their supervisor may be given chances for additional career/skill development. Continually doing an excellent job and making extra efforts increases your professional opportunities.

### Resources:

- *Employee-Student Consensual Relationships*

# research integrity

University members are engaged in a wide variety of research. Researchers must conduct research responsibly, in line with our ethical standards, all laws, regulations and policies. To help our researchers meet these expectations, we established standards to promote research integrity and protect the safety and privacy of study participants.

The responsible conduct of research includes five areas:

- Research subjects protection
- Research integrity
- Environmental and safety issues
- Fiscal accountability
- Education

Everyone who oversees or provides administrative support for research is expected to understand and follow all relevant laws, regulations and policies. If you have questions, contact the Office of Research and Innovation or Grants and Contracts and Effort Reporting for guidance.

**Research misconduct is fabrication, falsification or plagiarism, not honest error or differences of opinion**

Resources:

- *Research Misconduct*
- *Responsible Conduct in Research and Scholarship*

# intellectual property & confidential information

## Intellectual property

As part of our employment, we regularly produce valuable inventions, discoveries, ideas, process improvements, software programs, artwork and works of authorship. These work products are called intellectual property. VCU retains all rights, title, and interest in any and all intellectual property generated, created or developed as part of your duties or through the significant use of university resources, unless exempted in the Intellectual Property policy.

## Respecting confidentiality

Each of us has the responsibility to protect the university's intellectual property and confidential information by avoiding any unauthorized disclosures to others (either internal or external to VCU), who do not need to know the information for a legitimate business purpose. This responsibility continues even after employment ends.

Likewise, you must also be sure to respect intellectual property rights of others. For example, avoid:

- Using words or images of others as your own without citing the source
- Installing unlicensed software on university computer

### **FAQ: Does VCU claim ownership rights to the papers I publish?**

*No. University members retain all rights relating to publication, preparation of derivative works, distribution and classroom use of works which they have prepared on their own initiative, including papers published in scholarly journals or books.*

### **Resources:**

- *Intellectual Property*
- *Maintenance and Release of Employment and Personal Information*

# data integrity & privacy

## Accurate records

Because many people depend on the accuracy of our information to make responsible business decisions, it is very important that we ensure the integrity of university records and documents. This includes complete and reliable recording, as well as honesty in disclosures and in providing information.

Please keep in mind:

- Records must always be prepared accurately and reflect the true nature of the event/transaction
- Required disclosure of records must be full, timely, accurate and understandable
- Unrecorded funds, assets or “off the books” accounts (including overtime and leave reporting) are not allowed

**Flexible schedules are not the same as “off the books” leave reporting as long as hours are recorded accurately.**

If you feel you are being asked to compromise any of these principles, discuss your concern with senior leadership in your area or other communication option listed in the *Asking for Guidance and Voicing Concerns* section.

### Resources:

- What is Considered a Public Record?

## Retention and destruction

Business records and documents, including both hardcopy and electronic, must be retained or destroyed according to our Records Management policy and the schedules maintained by the Library of Virginia. You are expected to know and follow the appropriate retention schedules that apply to the records you create and maintain.

You must not knowingly destroy or discard information that is subject to a legal hold. All information relevant to a legal action must be retained until the hold is lifted.

Strict compliance with these expectations helps protect the university and individual employees.

**Holding on to records past retention schedule deadlines creates an unnecessary burden on you and/or your coworkers to produce these documents when the university receives a legal or FOIA request.**

### Resources:

- *Fixed Asset*
- *Records Management*
- *Research Data Ownership, Retention, Access and Security*
- *Record Lifecycle*
- *Records Management Decision Tree*

## Data security

We are committed to preserving an environment that encourages academic and research collaboration through the responsible use of information technology resources. With the integration of technology into our everyday lives, we are faced with new threats against the security and privacy of our information. In order to prevent the loss and theft of our information, you have a shared responsibility to protect our resources from these threats. Protection may be directed by legal, contractual, financial or other university considerations.

To protect our information, you must look for and raise concerns about security incidents, such as:

- Sharing of personal passwords
- Possible theft of electronic or paper data
- Theft or loss of devices
- Phishing emails and scams
- Malicious software infections that may lead to data theft
- Unauthorized access to email, files, physical space or computing resources

## Privacy

Electronic communications and data on a university-owned computer or on VCU's network resources may be disclosed under the Freedom of Information Act and other policies/regulations as necessary.

### Resources:

- *Computer and Network Resources Use*
- *Information Security*
- *Family Educational Rights and Privacy Act Tutorial*
- *FTC Safeguards Rule Tutorial*
- *Tips for Protecting Data*



# external communications

## FOIA and legal requests

We respond to all legal requests without unreasonable delay. If you receive a Freedom of Information Act (FOIA) request, whether written or verbal, note the date of receipt and notify the FOIA Officer at FOIAVCU@vcu.edu immediately. The university must respond within five working days to these inquiries. For this reason, you must notify University Counsel if you do not receive a response within 24 hours from the FOIA Officer. If you are served with a lawsuit or subpoena, also contact the Office of University Counsel. Remember that you must not begin searching for or copying records before talking to the FOIA Officer or University Counsel.

## Government inquiries and reviews

We comply with all valid governmental requests and processes, and our interactions with government authorities are honest, respectful and timely.

If a government official asks you to provide non-routine information or participate in a review, contact the Integrity and Compliance Office immediately before taking any action. This office will ensure we take appropriate steps to comply with the request.

### **FAQ: I have been served with a subpoena, but I do not have the requested information. What should I do?**

*Contact the Office of University Counsel immediately. Never ignore a subpoena, even if it addresses something you are unfamiliar with or asks for documents that you do not have. Not responding to a subpoena could result in you or the university being held in contempt of court.*

### **Resources:**

- Making and Responding to FOIA Requests

## Our brand

Remember, we all represent VCU. For that reason, you must only use approved graphic elements and terms in your communications. This helps ensure the university has a unified identity that continues to build local, national and international recognition. Consult our Brand Standards Guide to learn about proper usage of VCU's official logos, graphic elements and nomenclature, as well as other identity guidelines (e.g., fonts, email signatures, editorial style), handy tips and possible solutions. If you have questions, contact the Division of University Relations.

## Media and public relations

We are committed to disclosing clear, accurate, timely and appropriate information to the public. Only designated spokespersons are authorized to communicate publicly on behalf of the university. Media representatives must arrange interviews and photo shoots with employees in advance through the University Public Affairs office.

**I appreciate the hard work you do to solidify our respected reputation, and I thank you for adhering to the brand standards...-President Rao**

### **FAQ: Can I add a quote to my email signature?**

*It is best to avoid quotes and philosophical statements. These could be misinterpreted as the university's position rather than your own. Think of your email signature as your digital business card.*

### **Resources:**

- Brand Standards Guide
- Media Guidelines

## Social media

We are responsible, professional and respectful of others when using social media. Accordingly, you must never post confidential or proprietary information about VCU, our students, alumni, patients, research participants or coworkers. You also are expected to follow all privacy-related policies and federal requirements, such as the Family Educational Rights and Privacy Act and the Health Insurance Portability and Accountability Act.

Everyone who uses social media sites as part of their job function must conduct themselves in a manner that supports our mission and follows our Social Media Guidelines and Brand Standards. Contact the university social media team at [socialmedia@vcu.edu](mailto:socialmedia@vcu.edu) for help on developing an online voice for your unit, to ask questions about using VCU branding on personal social media sites or to submit a design to the University Communications Review Committee. Remember:

- Your coworkers and the organization deserve privacy and respect
- Be aware that statements may be misinterpreted and/or offensive to others
- Gossip and malicious talk about coworkers in a public setting can cause an uncomfortable working environment
- What you post is public forever
- Once you have posted something via social media, it is out of your control. Others may see it, repost it, save it, forward it, etc.

### Resources:

- Directory of VCU-Affiliated Social Media Sites
- Social Media Guidelines
- DHRM Policy: Use of Electronic Communications and Social Media
- Professionalism on Social Media
- Social Media Etiquette

# community

## Sustainability

We recognize the importance of sustainability for our quality of life today and for future generations and protecting the limits of natural systems. We are working to conserve resources and reduce emissions in all areas of campus life — from educational programs and facilities to dining and residential life — as part of our plan to become climate-neutral by 2050. Your individual efforts create a more sustainable, less wasteful campus.

## Community engagement

We collaborate with our community partners to enhance the quality of life for all who work, live and study in the Richmond area and beyond. You are encouraged to participate in community service projects in the Richmond region in the spirit that through doing, we grow as contributing citizens.

In support of this commitment, you have paid community service leave that can be used for:

Meeting with public or private school officials about your children or attend school functions in which your children are participating

Performing school-approved volunteer work in a public school (preschool through 12<sup>th</sup> grade)

Volunteering with community service organizations

### Resources:

- Find Service Opportunities
- VCU RamPantry

# further guidance & resources

we are committed to providing our employees with the tools for success

# decoding our code

## Resource key

Resources include policies, tools, websites, pop-up content and videos.

Many resources are linked in the next in addition to the resources list included on many of the pages.

## Navigation

The Code is split into four sections. The main sections are Ethical Behavior, Our Culture, Expectations and Other Guidance and Resources. The Main Section, Title, and Sub-section Title is noted in the footer of each page for easy reference.

## frequently asked questions

### **What am I expected to do with our Code of Conduct?**

*Read our Code of Conduct thoroughly at work and make sure you understand VCU's expectations. If you have any questions, talk with your supervisor, department management, Human Resources or any member of the Integrity and Compliance Office.*

### **What if some of my personal beliefs are in conflict with some of VCU's goals, policies or projects? Which one wins?**

*VCU does not seek to change the personal beliefs of our employees. However, we do define our expectations of how employees should behave in the workplace through our Code of Conduct and university policies. These, in turn, are based on our ethical standards. You may discuss these types of concerns with your supervisor or department management, or you may seek guidance from the Integrity and Compliance Office.*

### **What happens if I accidentally violate our Code of Conduct, a policy or a law/regulation?**

*It really depends; every situation is different. Employee misconduct, whether intentional or accidental, will be reviewed by management to ensure appropriate resolution and/or disciplinary measures are carried out.*

### **Will I be protected from disciplinary measures if I keep documentation showing that a higher-ranking employee asked me to circumvent or break a law, regulation or any of our policies?**

*No, you must never engage in behavior that knowingly compromises any law, regulation or policy. If you feel you are being pressured to do something unethical, do not do follow through and share your concern immediately. Refer to the Asking for Guidance and Voicing Concerns section for communication options.*

### **What is the VCU Ethics and Compliance Program?**

*The VCU Ethics and Compliance Program is the collective efforts of all the schools and business units exercising due diligence in order to prevent and detect unethical conduct. The Program is designed to promote a culture that encourages ethical conduct and compliance with laws, regulations, policies and our core values without disrupting the autonomous and successful operations of individual areas.*



# acknowledgement

Integrity is the cornerstone of our success and fundamental to achieving our mission.

Professional integrity and compliance does not just happen. It requires all of us to do our part by steadfastly adhering to our ethical standards, laws, regulations and policies that apply to us. You demonstrate your commitment to integrity by acknowledging the following:

- I have read and understand our Code of Conduct.
- I understand that more detailed guidance is provided in other resources, such as the Policy Library and VCU department/school websites, and I know how to access them.
- I understand that I am responsible for knowing and following our Code of Conduct and all laws, regulations and policies or other guidance that apply to me.
- I understand that I must disclose any personal/business interests that may appear to affect my decisions in the workplace.
- I understand that I have a duty to speak up, and I will raise concerns of any actual or suspected violation of our Code of Conduct, laws, regulations or policies.
- I understand VCU's policy against retaliation and I will not take any retaliatory action against any individual who raises a concern in good faith or participates in an investigation.
- I understand that I may be subject to disciplinary action if I violate laws, regulations or policies.

# ethical decision framework

If you are asked to do something that violates policy or doesn't feel right, you have options:

- Speak to a supervisor
- Contact a central office
- Notify the Integrity & Compliance Office ([compliance.vcu.edu](http://compliance.vcu.edu))
- Report your concern through the VCU Helpline ([vcuhelpline.com](http://vcuhelpline.com))

Remember...All business decisions are ethical decisions. They are one and the same, and therefore should be evaluated using the same framework.

Even though a decision may lead to a positive/beneficial outcome, if you did not follow required procedures or standards to achieve this result, it is not in line with VCU's expectations. In other words, the ends do not justify the means.

All employees are encouraged to consult this tool when faced with a difficult decision. However, the ethical considerations outlined in this framework should be applied to all business activities.

Decision Tree:

Is it Legal? If No, don't do it. If not sure, ask your supervisor, central office, the Integrity and compliance office or the VCU Helpline. If Yes, ask yourself if it could be perceived to violate a policy.

If not sure, ask. If no, think about whether this decision affects you financially. If yes, consult your supervisor, central office or the ICO. If no, ask if it is in line with all employee expectations? If not sure ask. If no, don't do it. If yes, go for it!

Answering "no" to one of these questions does not necessarily make the decision unethical, but it indicates that you should seek additional input before taking action.

Ethical Standards Litmus Test

- Respect: Have you considered how this decision or action may negatively impact others?
- Honesty: Does this decision demonstrate personal and professional integrity?
- Excellence: Is this the best option for the university and its stakeholders? Do you feel confident that you could effectively explain or support your decision?
- Responsibility & Accountability: Would you feel comfortable if your decision made the front page of the Richmond-Times Dispatch?
- Stewardship: Is this the best use of university resources?
- Compliance: Does this decision comply with the spirit of applicable laws, regulations and VCU policies?

# contacts

## Internal contacts

If you would like additional information or resources, you may contact the following resources directly:

- Your immediate supervisor or department management
- The responsible individual for the related area of compliance

If you have a compliance or ethics concern, you may also contact the Integrity and Compliance Office at **(804) 828-2336** or [ucompliance@vcu.edu](mailto:ucompliance@vcu.edu), or visit [go.vcu.edu/reporting-concerns](http://go.vcu.edu/reporting-concerns) for more information.

## VCU Helpline

Call the VCU Helpline if:

- You are uncomfortable using other resources outlined in our Code of Conduct
- You are unsure who to contact to answer a question or raise a concern
- You wish to ask a question or raise a concern anonymously

Submit questions or concerns at [www.vcuhelpline.com](http://www.vcuhelpline.com), call **1-888-242-6022** (from the United States) or make a collect/reverse charge call to **+1-720-514-4400** and give the name “Virginia Commonwealth University” or “VCU” if calling from Qatar. Dialing instructions for other countries are listed on the VCU Helpline website.

# index

## A

About our Code of Conduct .....	7
Academic expectations .....	22
Accessibility.....	16-17
Accounting matters .....	27, 37-38
Accurate records.....	37
Acknowledgement .....	48
Affiliations and employment, outside .....	29, 32-33
Age discrimination .....	16-17
Alcohol in the workplace .....	19
Anonymous reporting/request for guidance.....	10-13
Anti-corruption and bribery.....	26
Asking questions or voicing concerns.....	10-13
Assets, protection of.....	27

## B

Boards of directors, serving on .....	28, 30
Books and records .....	27, 37-39
Bribery and anti-corruption .....	26
Bullying, workplace .....	8, 16, 20

## C

Cash management.....	27, 37
Communications.....	40-42
Community engagement .....	44
Compliance, institutional.....	24-26
Compliance oversight .....	25
Compliance, operational .....	25
Compliance violations .....	10-11
Computer and networking systems use .	27, 36, 39
Computer security .....	36, 39
Confidential information .....	36, 39
Confidential reporting .....	10-12
Conflict of interests .....	29-34
Consenting relationships .....	34
Copyright .....	36
Corruption .....	26
Creed, VCU.....	22

## D

Data security.....	39
Decisions, ethical .....	7-10, 25

Disability discrimination .....	16-17
Discipline for retaliation .....	14
Discipline for violating our Code of Conduct.....	47
Disclosing conflict of interests.....	29-34
Disclosing consensual relationships .....	34
Discrimination in the workplace.....	16-17
Diversity.....	17
Drugs .....	19
Duty to speak up .....	10

## E

Electronic communications .....	27, 39, 41-42
Email.....	39, 41
Employee acknowledgement .....	48
Employment, outside affiliations .....	29, 32-33
Employment with (potential) vendors ....	28-30, 32
Entertainment (gifts) .....	31
Ethical principles .....	8
Ethics and Compliance Program.....	7, 25
Export Controls.....	26
External communications.....	40-42

<b>F</b>		<b>L</b>	
Fair employment.....	17	Laws in different countries .....	26
Family members, doing business with.....	29-30, 32	Legal hold .....	40
Favoritism .....	34	Library, Policy .....	24
Financial interest .....	29-30		
Financial investments .....	29-30	<b>M</b>	
Financial records.....	27, 36-37	Management’s responsibilities .....	9
Fiscal compliance .....	27-28	Marital discrimination .....	16-17
Foreign laws.....	26	Meals (gifts) .....	31
Framework, ethical decision .....	49	Media, contact by.....	41
Fraud.....	10	Minimal value for gifts .....	31
Accounting, financial reporting .....	37		
Bribery .....	26	<b>N</b>	
Leave abuse .....	27, 37	National origin discrimination.....	16-17
Personal use of university resources .....	27	Network security .....	39
Reporting, false or misleading .....	10, 37	News media, contact by .....	41
Freedom, academic .....	22	Nondiscrimination .....	16-17
		Non-retaliation .....	9-10, 14
<b>G</b>			
Gender discrimination .....	16-17	<b>O</b>	
Gifts and entertainment .....	31	Off the books accounts .....	37
Guidance, asking for .....	10	Outside affiliations and employment.....	29, 32-33
Guidance, procurement.....	28	Ombudsperson .....	10, 13
<b>H</b>			
Harassment.....	16, 20		
Health and safety, and security .....	19-20		
Helpline, VCU.....	9-13		
Hostile work environment.....	16-19		
<b>I</b>			
Ideas (intellectual property) .....	36		
Identity manual (our brand) .....	41		
Information systems, use of .....	27, 39		
Institutional compliance .....	24-25		
Integrity, research .....	35		
Intellectual property.....	36		
Interest disclosure .....	29-34		
Internal contacts.....	50		
International presence .....	26		
Internet, use of .....	27, 39, 41		
Intimidation .....	16, 20		
Investigations .....	14, 40		
Investments (interest disclosure) .....	29-34		
<b>J</b>			
Jobs, outside of VCU .....	29, 32-33		

<b>P</b>			
Passwords .....	39		
Personal activities .....	33		
Personal relationships .....	34		
Personal use of university resources .....	27, 33		
Policy Library.....	24		
Political activities .....	33		
Privacy.....	39		
Protection of information .....	36, 39		
Procurement guidance .....	28		
Public relations .....	41		
<b>Q</b>			
Questions about ethical issues .....	10-11, 47		
<b>R</b>			
Racial discrimination.....	16-17		
Raising concerns .....	10-12		
Receiving gifts .....	31		
Records, accurate .....	37		
Records management.....	37-38		
Records retention and destruction.....	38		
Relatives (interest disclosure) .....	29, 32, 34		
Religious discrimination .....	16-17		
Reporting concerns.....	10-12		
Reporting hours worked and leave .....	27, 37		
Reporting suspected noncompliance .....	10-12		
Research integrity.....	35		
Resources, university.....	27		
Resources, safeguarding.....	27, 36, 39		
Responsibilities, shared .....	9		
Retaliation .....	9-10, 14		
<b>S</b>			
Safety .....	19-20		
Security, data.....	36, 39		
Security, information.....	36, 39		
Serving on a board of directors .....	28, 30		
Sex discrimination .....	16-17		
Sexual harassment.....	16		
Social media.....	42		
Social networking .....	42		
Speaking up .....	10-12		
Stewardship.....	27		
Substance abuse.....	19		
Supervisor’s responsibilities .....	13		
Sustainability .....	43		
<b>T</b>			
Threats .....	20		
<b>U</b>			
University counsel .....	26, 40		
University resources.....	27		
Unrecorded accounts .....	37		
<b>V</b>			
VCU Creed .....	22		
VCU Helpline .....	10-12		
Vendor expectations .....	28		
Veteran status discrimination .....	16-17		
Violations of our Code of Conduct .....	47		
Violence.....	20		
Voicing concerns .....	10-12		
Volunteering.....	33, 44		
<b>W</b>			
Weapons .....	20		
Workplace conduct .....	8-9, 16-20		
Workplace health and safety .....	19-20		
Workplace violence .....	20		

an equal opportunity/affirmative action university