Real expectations.

Code of Conduct
As members of an academic learning community, we take very seriously our responsibilities 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 they are institutionalized through our Code of Conduct. This helps provide an environment in which 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 operate, first and foremost, with integrity. Specific university policies supplement our code’s 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 for clarification, when needed.

This framework can help us avert major problems that can derail progress. Many times, such problems start out as small issues that go unattended. Our objective is to foster a culture that prevents such problems from arising by identifying issues early 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**

As the premier urban, public research university in Virginia, VCU’s mission is to advance knowledge and student success through its commitments to:

- **An engaged, learner-centered environment** that fosters inquiry, discovery and innovation in a global setting
- **Interdisciplinary collaborations** that bring new perspectives to complex problems and mobilize creative energies that advance innovation and solve global challenges
- **Health care** that strives to preserve and restore health for all people, to seek the cause and cure of diseases through groundbreaking research, and to educate those who serve humanity
- **Research** that expands the boundaries of new knowledge and creative expression and promotes translational applications to improve human health
- **Diversity** that provides a climate of inclusion, a dedication to addressing disparities wherever they exist, and an opportunity to explore and create in an environment of trust
- **Sustainable, university-community partnerships** that enhance the educational, economic and cultural vitality of the communities VCU serves in Virginia and around the world

**vision statement**

VCU will be a premier urban, public research university distinguished by its commitment to:

- The intellectual and academic success of a diverse student body
- Research and discovery that advances knowledge, inspires creativity and improves human health
- The global engagement of students, faculty and staff that transforms lives and communities
Whenever we are unsure a decision or action meets expectations of the law, regulations or VCU policies, the following resources are available to us:

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

Note: This Code of Conduct does not alter the terms and conditions of employment, or constitute express or implied contractual obligations or contracts of employment.
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## Our Culture

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Last Revised: April 12, 2013
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 we each take responsibility to act ethically in all situations.

Additionally, our Code of Conduct helps us to identify potential issues, lists resources where we 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 of Conduct is part of our universitywide Compliance and Ethics Program, supported by the VCU Board of Visitors, the president and senior leadership. The Integrity and Compliance Office oversees our Compliance and Ethics Program with the support of the Compliance Advisory Committee.

Who must follow our Code of Conduct?

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

Please read our Code of Conduct carefully. If you have any questions, refer to our Code of Conduct’s Asking for Guidance and Voicing Concerns section.

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

Our Code of Conduct 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 in our Code of Conduct. 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:

<table>
<thead>
<tr>
<th>Principle</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>respect</td>
<td>We will respect individuals, diversity and the rights of others.</td>
</tr>
<tr>
<td>honesty</td>
<td>We will act and communicate honestly and candidly. We will not mislead others.</td>
</tr>
<tr>
<td>excellence</td>
<td>We will strive for excellence in all that we do.</td>
</tr>
<tr>
<td>responsibility &amp; accountability</td>
<td>We will be responsible and accountable for our decisions and actions.</td>
</tr>
<tr>
<td>stewardship</td>
<td>We will be good stewards of the resources entrusted to the university.</td>
</tr>
<tr>
<td>compliance</td>
<td>We will understand and comply with the codes, laws, regulations, policies and procedures that govern our university activities.</td>
</tr>
</tbody>
</table>

We recognize that our decisions and actions reflect not only upon our individual reputations but also upon the reputation of the university. Our actions will be 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 violate policy?
- Does this decision affect you financially?
- 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 & Compliance Office; or ask a question through the VCU Helpline before taking action. For more information, refer to our Code of Conduct’s 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

To meet these goals, discuss expectations with your employees so they have adequate knowledge and resources to follow our Code of Conduct, and support employees who ask questions or voice concerns.

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 and voicing concerns

Duty to speak up

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

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

Examples of violations that we should report include actual or suspected:

- Violations of governmental regulations
- Violations of our ethical standards
- Violations of VCU policies and procedures

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 (NCAA violations)
  - Audit and Compliance Services (potential fraud)
  - Human Resources (employee misconduct)
  - Office for Institutional Equity (discrimination)
  - Office of the Provost (academic regulations)
  - Procurement Services (improper receiving of gifts, improper use of university purchasing/travel cards)
  - Office of Research and Innovation (research integrity)
- The VCU Ombudsperson
- The Integrity and Compliance Office
- The VCU Helpline

Related policies:
- Duty to Report and Protection from Retaliation
What happens when I voice a concern to the Integrity and Compliance Office or VCU Helpline?

Your concerns will be taken seriously, and the information you share will be treated confidentially to the extent possible. However, your concerns may be shared as necessary to investigate and resolve issues.

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

Am I able to raise concerns anonymously?

Yes. Questions or concerns may be submitted to the VCU Helpline anonymously at www.vcuhelpline.com, by calling 1-888-242-6022 (from the United States) or by making a collect call to 503-748-0867 and giving the name “Virginia Commonwealth University” if calling from Qatar.

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

Whenever you believe misconduct may have occurred, you are expected to report the concern without unreasonable delay. It is management’s responsibility to look into the matter and determine whether misconduct actually took place.
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 identified in our Code of Conduct, or wish to remain anonymous, you may call or log a report to the VCU Helpline. Refer to the Internal Contacts section for additional details.

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.

Reports are investigated or overseen by the Integrity and Compliance Office with assistance from other areas as needed.

Is my phone number or my computer’s IP address tracked when I use the Helpline?

No. All information submitted to the VCU Helpline will remain secure and anonymous unless you choose to disclose your identity (in which case, the information you provide will be treated confidentially to the extent possible).

Our helpline vendor, Convercent, does not track or share phone numbers or any internal connection logs with IP addresses, so no information linking your phone number or device to a report is available.
Retaliation is prohibited

By asking a question, raising a concern in good faith or participating in a workplace investigation, you are following our Code of Conduct and doing the right thing. Retaliation in response to these activities will not be tolerated. Knowingly making a false report, or reporting with malice or reckless disregard for the truth is also prohibited.

Retaliation is an adverse employment action (or credible threat of an adverse employment action) taken against an employee who raised a concern in good faith or participated in an investigation. Adverse employment actions effect the terms and conditions of employment and would deter a reasonable person from making or supporting a report of misconduct. Examples include unjustified negative evaluations/references, demotion or termination in response to a good faith report. To learn more, please review the Duty to Report and Protection from Retaliation policy.

Any employee who engages in retaliation will be subject to disciplinary action up to and including termination. If you suspect retaliation in response to reporting a concern or participating in an investigation, please contact the Integrity and Compliance Office immediately or make a report 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 circulation 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

A co-worker forwarded a joke to me and some colleagues via email. I find it offensive, but I am not sure if I should speak with my co-worker about my concern. What should I do?

We all have an obligation to help make VCU a great place to work, and offensive behavior such as this is not permitted.

If you feel uncomfortable speaking with your co-worker directly, you may consult the ombudsperson for advice or talk with your supervisor or department management, Equity and Access Services, Human Resources or the Integrity and Compliance Office.

Fostering dignity and respect promotes VCU’s expectations of integrity, honesty, accountability, diversity, collaboration, freedom and producing maximum achievements throughout our culture.
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 employees’ disabilities or religious beliefs and practices. See the VCU Notice of Nondiscrimination for more information.

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.

Accordingly, 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.
workplace health, safety and security

Safe working conditions

We are all expected to support VCU’s efforts to maintain a healthy and safe workplace by:

- Following all applicable workplace health and safety laws and university policies
- Cooperating with university officials 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 illicit drugs or alcohol negatively affects our ability to perform our jobs safely and do our best. The unlawful or unauthorized manufacture, distribution, dispensation, possession or use of alcohol or illicit drugs in the workplace, on university property or as part of any university activity is prohibited.

Related policies:
- Alcohol and Other Drugs
- VCU Safety Manual
- Worker’s Right to Know

I noticed a safety hazard, but it is not in my department/building. Should I report it?

Yes. Each of us is obligated to make VCU a safe and secure workplace. You are expected to report this type of concern immediately to your supervisor or department management, the Office of Environmental Health & Safety or through communication channels listed in our Code of Conduct’s Asking for Guidance and Voicing Concerns section as appropriate.
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, over the phone, in the mail or electronically

Possessing, brandishing or using a weapon that is not required by your position (e.g., VCU Police Officer or food preparation personnel) while on campus or conducting university business is never allowed.

Related policies:

- Threat Assessment & Violence Prevention
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 transmit knowledge and to develop in their students, faculty and staff the capacity for creative and critical thought. As members of the academic community, we should strive to exemplify the following specific ideals in addition to other worthy 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.
institutional compliance

Laws, regulations and policies

We are expected to promote a culture of honesty, integrity and compliance with all applicable laws, regulations and university policies when performing our duties. By doing our part, we are able to mitigate risks that could diminish the vital resources and distinguished reputation of VCU, as well as 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 other communication channel listed in our Code of Conduct’s Asking for Guidance and Voicing Concerns section.

Virginia Department of Human Resource Management’s Standards of Conduct policy provides additional details concerning workplace expectations for classified employees.
All of us are expected to help ensure compliance. 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 compliance activities.

The ICO strives to promote a culture of integrity and compliance to ensure an effective ethics and compliance ethics program. Accordingly, the ICO provides advisory services and resources to all employees.
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, we are expected to know and follow these laws. If you have questions, contact the Office of University Counsel at (804) 828-6610 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 this provision of our Code of Conduct, you must immediately notify the Office of University Counsel, the Integrity and Compliance Office or submit a report through the VCU Helpline.

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, we are expected to follow all applicable export control laws.

Export control laws restrict certain items, software, technology and services from being transmitted overseas or to foreign persons in the U.S. If you are traveling abroad or engaged in any activities that may be covered by export control laws, please contact the Office of Research and Innovation for guidance.
fiscal compliance and asset management

Stewardship of university/state 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. Be alert and report any misuse of university resources to the appropriate communication channel listed in our Code of Conduct’s Asking for Guidance and Voicing Concerns section.

University resources include, but are not limited to:

- Facilities
- Equipment
- Vehicles
- Technologies/software
- Network/electronic systems
- Records (both paper and electronic)
- Funds (both cash and cash equivalents such as checks, postage and purchasing cards)

Time is also a resource. During work hours, we must devote our attention to our job responsibilities. Those of us who are compensated based on hours worked must record and report time accurately and in accordance with our policies.

Related policies:

- Computer and Network Resources Use
- Leave and Time Reporting
- Maintenance and Release of Employment and Personal Information
Procurement guidance

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

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

Related policies:

- Conflict of Interests
- Reimbursable Business Expenses
- University Business-Related Travel

We do business with vendors who comply with the laws and act in a manner consistent with our commitment to integrity and compliance. If you suspect that a vendor is not meeting these expectations, you should report it.
interest disclosure

We owe our primary professional allegiance to the university and our mission. Activities outside of the workplace, private financial interests or the receipt of benefits from third parties can create an actual or perceived conflict between personal interests/commitments and our mission. A conflict exists when these interests/commitments affect, or appear to affect, our ability to make unbiased business decisions or detract from our university responsibilities.

Situations that create, or appear to create, a conflict of interest/commitment must be avoided, resolved or appropriately disclosed so that it may be managed. Having a conflict is not necessarily wrong, but failing to disclose it is.

Situations that may lead to a conflict are discussed in detail on the following pages...

Some situations where a conflict may arise:

- 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 to support your activities outside of the workplace
- You accept gifts from a company that does or seeks to do business with VCU
Financial interests

We must ensure that family members’ and our 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?

Related policies:

- Conflict of Interests
- Conflict of Interests in Research
- Institutional Conflicts of Interest in Research
Gifts & entertainment

As employees of VCU, we are stewards of the public’s trust. Therefore, we 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.

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

Related policies:
- Conflict of Interests
- Employee Ethics, Conduct and Practices Related to University Advancement and Development
- Gifts of Art to VCU

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

In general, providing or accepting promotional items (e.g., coffee cups, pens or similar tokens), occasional meals or other non-cash items of minimal value is 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. We are expected to know the policies that apply to our 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.
Outside employment and affiliations

Outside professional activities may appear to create a conflict of interest or a conflict of commitment. If you work, or sit on a Board of Directors, for a company that you (or a direct report) do business with as part of employment activities 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 any potential conflicts of interest, you must obtain written permission beforehand.

Related policies:
- Conflict of Interests
- Outside Professional Activity and Employment, Research and Continuing Education
- Conflict of Interests in Research

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.

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.
Political activities

Many of us have opinions on political issues and support political candidates and parties. We must conduct these activities on our own time and without using university resources. For a list of university resources, please see our Code of Conduct’s Stewardship of University/State Resources section.

Q&A

I am organizing a fundraiser for a friend who is running for political office. I want to use the office copier to make copies of the event flyer to pass out. Is this okay?

No. While we respect your political beliefs and activities and participation in the fundraiser, we do not permit using university resources (equipment, property and time).

Always keep in mind that we are all representatives of VCU. Conduct outside the workplace can affect perceptions of the university, our brand and our coworkers.

Personal activities

While we are encouraged to participate in community and charitable activities, we must not represent our personal opinions as those of VCU or impose our personal beliefs or opinions on our coworkers. Further, we 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

Related policies:
- Conflict of Interests
- Solicitation
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:

<table>
<thead>
<tr>
<th>Consent relationships between employees or employees and students</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is expected that we will not engage in consensual relations with a student or another employee if we are in a position to influence the academic or employment activities of the individual.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Nepotism</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is expected that we will 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 administrative authority over is discouraged to avoid or minimize misunderstandings within our work units.</td>
</tr>
</tbody>
</table>

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

Related policies:
- Employee-Student Consensual Relationships
research integrity

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

The responsible conduct of research specifically encompasses five areas:

- Research subject 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, the Office of Research and Innovation or the Office of Grants and Contracts Accounting and Effort Reporting is available to provide guidance.

Related policies:

- Intellectual Property
- Misconduct in Research and Scholarly Activities
- Responsible Conduct in Research and Scholarship
intellectual property and 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.

Safeguarding information

Each of us has the responsibility to safeguard 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.

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.

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

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

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

Business records and documents, including both hardcopy and electronic, must be retained or destroyed according to VCU’s Records Management policy and the schedules maintained by the Library of Virginia. Everyone who is responsible for preparing or maintaining any university records is expected to know and follow the appropriate retention schedules that apply to the records you keep.

We 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.

Related policies:
- Fixed Assets
- Records Management
- Cash Receipting

We are expected to manage information efficiently and in accordance with the law.
We are committed to preserving an environment that encourages academic and research collaboration through the responsible use of information technology resources. However, 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, we must realize a shared responsibility, and collectively protect ourselves from these threats. Protection may be governed by legal, contractual, financial or other university considerations.

To protect our information, we must all observe and report security incidents, which include, but are not limited to:

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

**How do I report a security incident?**

Report any suspected information security incidents to the VCU HelpIT center at (804) 828-2227. Alternatively, you may also report the incident directly to the Office of Information Security.

**Related policies:**

- Computer and Network Resources Use
- Information Security
- Maintenance and Release of Employment and Personal Information
external communications

Legal requests

We respond to all legal requests without unreasonable delay. If you are served with a lawsuit or subpoena, or receive a Freedom of Information Act (FOIA) request, contact the Office of University Counsel immediately. The university must respond within a specified time to these inquiries. For this reason, you must notify University Counsel by calling (804) 828-6610 as soon as you are served to ensure a timely response. Remember that you must not begin searching for or copying documents before talking to University Counsel.

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. A subpoena is an order of the court and failure to respond to a subpoena could result in you or the university being held in contempt of court. Never ignore a subpoena, even if it addresses something you are unfamiliar with or asks for documents that you do not have.

Q&A

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 (ICO) immediately before taking any action. The ICO will ensure appropriate actions are taken to comply with the request.
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.

Our brand

Remember, we all represent VCU. For that reason, we must only use approved graphic elements and nomenclature in our communications. This helps ensure the university is represented in a consistent manner that continues to build local, national and international recognition.

Consult the VCU Brand Standards Guide to learn about proper usage of VCU’s official logos, graphic elements and nomenclature, as well as other identity guidelines, handy tips and possible solutions. If you have questions, contact the Division of University Relations.

Social media

We are responsible, professional and respectful of others when using social media. Accordingly, we must never post confidential or proprietary information about VCU, our students, alumni, patients or our co-workers. We also are expected to follow all university 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 himself or herself in a manner that supports our mission and follows our Social Media Guidelines and Brand Standards.
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 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.

As a member of the VCU community, you can become a part of the universitywide effort to create a more sustainable, less wasteful campus. Only through individual efforts can change of this magnitude be possible.

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.

Where can I find more information on events and campus initiatives that support sustainability and community engagement?

Check out the Office of Sustainability website to learn more about our environmental efforts and how you can get involved.

You can also learn about community projects and events supported by VCU on the Community Engagement website.
further guidance & resources

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

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, another 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 violates any law, regulation or policy. If you feel you are being pressured to do something unethical, do not do follow through and report your concern immediately. Refer to our Code of Conduct’s Asking for Guidance and Voicing Concerns section for your reporting options.

What is the VCU Ethics and Compliance Program?

The VCU Ethics and Compliance Program is the expression of commitment by VCU to carry out its educational, research and business practices with the highest integrity and in compliance with all relevant laws, regulations, VCU policies and core values. The Program is in place to prevent, detect and resolve misconduct in order to support a culture of integrity and compliance.
In a Sticky Situation?

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)
- Report your concern through the VCU Helpline (vcuhelpline.com)

Remember...

- All business decisions are ethical decisions. They are one in 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.

Don’t do it

Is it legal?

Could it be perceived to violate a policy?

Does this decision affect you financially?

Is it in line with all Employee Expectations?

Go for it

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 Conduct), speak to your supervisor; consult a central office or the Integrity & Compliance Office; or ask a clarifying question through the VCU Helpline.

Ethical Standards: Litmus Test

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.

- **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, or visit www.compliance.vcu.edu 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, call 1-888-242-6022 from the United States or Canada or make a collect call to (503) 748-0867 and give the name “Virginia Commonwealth University” if calling from abroad.
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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 all of the 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 have a duty to speak up, and I will report 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 reports a concern in good faith or participates in an investigation.
- I understand that I may be subject to disciplinary action if I violate our Code of Conduct or any applicable laws, regulations or policies.