

CODE OF PROFESSIONAL CONDUCT

POLICY STATEMENT

The University of St. Thomas is committed to upholding the highest ethical standards in all that it does and expects those who are part of the University community, including trustees, officers, faculty, staff, and students to adhere to such standards in their business dealings. This policy applies to trustees, officers, faculty, staff, students, and others who manage, supervise or conduct university business, financial and administrative transactions and activities. Included in this Code of Professional Conduct are guiding principles for expected business practices behavior. This policy complements, but does not replace, policies, procedures, guidelines, and other policies referenced in the Faculty Handbook, Employee Handbook, Student Handbook, Handbook for Academic Administrators, or other appropriate references to federal, state, and University policy.

Section I Standards of Integrity and Quality

Ethical business conduct requires trustees, officers, faculty, and staff to safeguard and preserve university assets and resources in fulfilling its mission and strategic priorities. The University will comply fully with all relevant laws and all contract and grant requirements, as well as with its own high standards of integrity and quality. This includes maintaining the integrity of all business, academic, and student information. Faculty and staff are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contract and grant requirements. In addition to complying with specific laws and regulations that govern business activities, standards of fairness, honesty, and respect for the rights of others will govern the University's conduct at all times.

Faculty and staff who have questions or who want clarification on any part of applicable policies may contact the Department of Human Resources or refer to the Employee Handbook, the Division of Academic Affairs for questions regarding the Faculty Handbook and Handbook for Academic Administrators, or the Office of the Vice President for Business Affairs for questions related to financial procedures.

SECTION II CONFIDENTIAL NATURE OF UNIVERSITY AFFAIRS

The University recognizes its responsibility to protect the privacy and confidentiality of information it receives or generates. In the course of performing their job responsibilities, faculty and staff may have access to a range of business, financial, or personnel data. As such, faculty and staff are expected to safeguard the privacy and confidentiality of such information and protect it from unauthorized access, use, or destruction. Faculty and staff handling confidential information are responsible for its security. Extreme care must be used in the storage and/or destruction of confidential information. Abuse or misuse of university information or data, unauthorized access, dissemination, or failure to properly protect data may constitute a violation of this policy. A complete copy of the University's Confidential

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Nature of University Affairs Policy is available in the Employee Handbook.

SECTION III CONFLICT OF INTEREST

Trustees, officers, faculty, staff, and students are obligated to avoid involvement in activities, which might conflict, or appear to conflict, with their institutional responsibilities. Decision-making in matters in which a conflict of interest may exist, may not only create an appearance of impropriety but may violate the law.

The University publishes basic guidelines to which faculty and staff can refer. However, the University recognizes that the good judgment of its faculty and staff is essential, and that no policy or guidelines can provide direction for all potential circumstances that may arise. It, therefore, is the responsibility of the University, faculty, and staff to guard against conflicts of interest, which might compromise the integrity and objectivity of the University community. A copy of both the Conflict of Interest Annual Disclosure Statement and the Financial Conflict of Interest Disclosure Statement are available for your review.

Moreover, faculty and staff who apply for or receive a grant or contract must follow prescribed policies as set forth in the Faculty Handbook and the Handbook for Academic Administrators.

SECTION IV EQUAL EMPLOYMENT OPPORTUNITY

The University is committed to providing equal opportunity to all faculty, staff, applicants for employment, and students in accordance with all applicable Equal Employment Opportunity and Affirmative Action laws, directives and regulations of Federal, State and Local governing bodies or agencies, specifically including Chapter 139.50 and 141 of the Minnesota Civil Rights Ordinance and the Rules and Regulations as applicable. The University will not discriminate against or harass any faculty, staff, applicant for employment because of race, color, creed, religion, ancestry, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance. With respect to religion and creed, as permitted by law, the university reserves the right to exercise discretion in employment decisions to employ persons who share and are committed to the values and mission of the university.

Moreover, the University prohibits the harassment of any faculty, staff, student, or job applicant on the basis of their protected class status. The university affirms the value of cultural diversity for all students, faculty, and staff. Therefore, it will commit the necessary time and resources, both financial and human, to achieve the goals of Equal Employment Opportunity and Affirmative Action. Several policies form the basis for this policy and are available at the following links:

- [Equal Employment Opportunity Policy](#)
- [Sexual Harassment Policy](#)

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- Sexual Violence and Resolution Processes
- Hate Crimes and Bias-Motivated Incidents

SECTION V REPORTING SUSPECTED VIOLATIONS

The University is committed to maintaining the highest ethical standards in all of its business practices. It accepts responsibility for the stewardship of resources and private support it receives, which enables St. Thomas to pursue its mission and strategic objectives. Supervisors, managers, or other university officials shall not compel or attempt to compel faculty, staff, students, applicants for employment, or other university constituents to violate a law, statute, or university policy. At St. Thomas, accountability is the cornerstone of ethical business practice, and the university's Whistleblower's Policy is one of the mechanisms for assuring compliance with this institutional value.

Faculty, staff, students, applicants for employment, or other university constituents may make a protected disclosure at any time after witnessing or becoming aware of an improper activity or may do so after the individual knew or reasonably should have known of the protected activity. There are several avenues for making a protected disclosure. Faculty, staff, students, and other constituents may

- a) Report a potential *Improper Activity* anonymously through the University's whistleblower hotline at <http://www.ethicspoint.com> or by calling **888-258-3176**, managed by EthicsPoint, Incorporated—a governance, risk management, and compliance company. Anonymous complaints are reported and reviewed by the Audit and Finance Committee of the Board of Trustees.
- b) Faculty, staff, applicants for employment, or other constituents may file a complaint with any of the following University personnel:
 - Chief Human Resources Officer
 - Executive Advisor to the President
 - Executive Vice President and Chief Administrative Officer
 - Executive Vice President and Chief Academic Officer
 - Human Resources Partners
- c) Students may contact the following administrators:
 - Dean of Student in the Division of Student Affairs
 - Vice President for Student Affairs
- d) Download and complete the Improper Activities Report Form and mail to:
Chief Human Resources Officer

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2115 Summit Avenue, St. Paul, Minnesota 55105

- e) **Students only:** Download and complete the Improper Activities Report Form and fax to:

651-962-6050, Attention: Dean of Students.

SECTION VI FINANCIAL REPORTING

All University financial transactions and reports, including tax returns, must be accurate and completed in a timely manner. Our Board of Trustees, President, Officers and others who work together to fulfill the mission of the University have different financial roles and responsibilities, which are defined in the Responsibility for University Financial Affairs Policy.

SECTION VII COMPLIANCE WITH LAWS, POLICIES, AND STANDARDS

Members of the University community must transact University business in compliance with applicable laws, regulations, and University policies and procedures. Managers and supervisors are responsible for teaching and monitoring compliance. When questions arise pertaining to interpretation or applicability of policy, contact the individual who has oversight of the policy.

a. **Contractual Obligations.**

The acceptance of an agreement, including sponsored project funding, may create a legal obligation on the part of the University to comply with the terms and conditions of the agreement and applicable laws and regulations. Therefore, only individuals who have been delegated proper authority by an appropriate University official are authorized to enter into contractual agreements on behalf of the University. See UST Contract Policy.

b. **Environmental Health & Safety, including Workplace Health and Safety.**

Members of the University community must be committed to protecting the health and safety of its members by providing safe workplaces. The University will provide information and training about health and safety hazards, and safeguards. Community members must adhere to good health and safety practices and comply with all environmental health and safety laws and regulations. See Environmental Safety information.

c. **Non-University Professional Standards.**

Some professions and disciplines represented at the University are governed by standards and codes specific to their profession (such as attorneys, certified public accountants, and medical doctors). Those professional standards generally advance the quality of the profession and/or discipline by developing codes of ethics, conduct, and professional

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responsibility and standards by which their members are guided. Those belonging to such organizations are expected to adhere to University policies and codes of conduct in addition to any professional standards. If a community member believes there is a conflict between a professional standard and University policy, he/she should contact the Department of Human Resources.

d. Academic Policies and Procedures.

Please refer to the University of St. Thomas, Faculty Handbook.

e. Download a copy of the Handbook for Academic Administrators.

SECTION VIII USE OF UNIVERSITY RESOURCES

Occasional limited use of University resources by faculty and staff, including e-mail, the Internet, and telephone is permitted for personal use provided faculty and staff meet the following criteria:

- There is minimal or no cost to the University;
- The use is brief in duration and occurs infrequently;
- The use does not interfere with the job performance of faculty or staff
- The use does not disrupt or distract from the University's business operations or academic enterprise due to volume or frequency of use.
- The use does not compromise the security or integrity of University property;

The University adopted several years ago a policy regulating the use of its computing resources. Faculty and staff may download a copy of the Acceptable and Unacceptable Use Policy.

SECTION IX ANNUAL REVIEW

The University reviews and updates, where appropriate, the Code of Conduct and assures ethical business practices and compliance with relevant laws and regulations that govern its nonprofit corporate status. New faculty and staff shall receive information and training about the Code of Conduct, and will be asked to acknowledge receipt of the Code of Conduct.

SECTION X RECORDS RETENTION

The University of St. Thomas recognizes its responsibility to donors, sponsors, regulatory bodies, the academic community, and the public to preserve records documenting the activities of the University, adhere to all applicable policies and regulations regarding the collection, preservation, and maintenance of records concerning the University's operation. A copy of the policy is available on the Records Management Program web page.

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From time to time, the Vice President of Business Affairs may issue a notice, known as a “legal hold,” suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Vice President of Business Affairs. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the University and its employees and possibly disciplinary action against responsible individuals. The Vice President of Business Affairs will periodically review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.