

Business Ethics Policy

October 15, 2007

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From The President

Dear Colleagues,

As employees and caretakers of WPI, we all have an obligation to perform our duties in a manner that supports and advances the university's mission and goals. This is especially true when we are managing, investing, or allocating WPI's financial resources, which have been entrusted to us by generations of students, parents, alumni, friends, and university leaders.

On any given day, many WPI employees may be engaged with outside companies, individuals, government agencies, and community organizations. We have therefore created a Business Ethics Policy that is designed to protect the university's assets while providing a guide for appropriate business behavior and practices. Of course, ethics and integrity are ultimately the responsibility of each individual, but you will find here an excellent reference for assisting you in achieving the highest standard of personal and professional conduct.

At WPI, we are deeply committed to excellence and integrity in all that we do. Let each of us demonstrate these values as we work together, treating every member of the WPI community with respect and dignity, and stewarding this splendid university in the manner it deserves.

Thank you for all that you do to create and maintain a vibrant and strong WPI.

Sincerely,

Dennis D. Berkey, President

Introduction

WPI, like many other institutions, operates by means of a decentralized organizational structure through which responsibility is delegated for a variety of business and accounting functions. This delegation is managed through the issuance of policies and procedures prescribing the manner in which business transactions are to be administered, and through the setting of specific limitations and internal control procedures.

All employees charged with these responsibilities should be familiar with all appropriate WPI policies and procedures.

Should you have a question regarding business practices that are not addressed in this document, please feel free to contact any of the senior managers of the Division of Finance and Operations (ext. 5754).

Working with One Another

WPI reaffirms its commitment to the principle of equal opportunity and equal treatment in education and employment regardless of a person's race, color, religion, sex, sexual orientation, age, disability, veteran's status, or national origin. In accepting either a faculty or staff position at WPI, an individual agrees to share this commitment in the performance of his or her assigned responsibilities and in interactions with faculty and staff colleagues and students.

WPI strives to provide all staff and faculty with a work environment that is free of harassment or other unreasonable interference with the performance of their university duties. We aspire to be a community of colleagues in which mutual respect guides our day-to-day interactions. While the university respects an individual's right to self-expression, it expects that the rights and concerns of others who work at WPI are respected as well. At WPI, there is no place in the work environment for conduct that demeans or belittles another person. For these reasons, harassment of any kind is unacceptable.

The above complies with WPI's Anti-Harassment Policy. You are urged to review the Anti-Harassment Policy at www.wpi.edu/Admin/HR/BenMan/harassment.html.

Confidentiality

Many staff and faculty members handle a variety of proprietary and private information concerning colleagues, students, alumni, donors, or others associated with the university, as well as confidential information regarding university business. This material may include payroll figures, personal data such as employee home addresses, donor files, or student records. It is the responsibility of all WPI employees to respect the highest level of privacy for their colleagues and other members of the WPI community. Disclosure and discussion of confidential information obtained from university or department records, either during or after employment with WPI, is impermissible unless such disclosure is a normal requirement of an employee's position and has been so authorized. If an employee is unsure about the appropriateness of disclosing certain information, he or she should consult with a supervisor, department head, Human Resources, or the General Counsel.

In the course of employment, certain employees will have access to confidential information related to research. This sometimes includes information related to WPI-owned intellectual property or information belonging to a research sponsor for which the university has agreed to maintain confidentiality. It may also include confidential information related to research

subjects. Employees will be expected to respect the confidential nature of such information and not to disclose it in any manner unless specifically authorized by the principal investigator of the research project.

Questions & Answers

I received a call from another WPI employee requesting the home addresses, phone numbers and/or personal e-mail addresses of several staff members in my office. Should I release this information?

No. Employees expect the university to exercise great discretion in sharing personal information, and their privacy should therefore be respected. An employee's home address, phone number, and/or personal e-mail addresses should not be released without his/her consent, unless a case of emergency - a medical crisis, for instance - warrants this action.

My supervisor is identified as the financial manager on a number of budget accounts. I maintain the account and budget records for our department and have been requested by a coworker to provide information regarding a particular transaction affecting one of the accounts. Should I share this information?

No. Only the financial manager for that account should answer questions regarding transactions. You should refer the coworker to your supervisor, who can best decide whether or not to provide the answer.

As part of my job as a faculty member and academic advisor, I am often required to meet with our department's students and discuss their grades. Should this information be treated confidentially?

Yes. Grades are considered confidential information, so care should be taken to make certain that a student's grade information is released only to him or her.

Conflict of Interest

General Purpose

WPI employees are responsible for performing their duties in good faith and in the best interests of the university. In particular, employees are expected to avoid activities, agreements, business investments or interests, or other situations that materially conflict or appear to conflict with the interests of the university or interfere with the individual's duty to loyally serve the university to the best of his or her ability.

Definition of Conflict of Interest

A conflict of interest exists when an employee is in a position to benefit personally, directly or indirectly, from his or her relationship with an entity or person conducting business with WPI. All employees have an obligation to avoid conflict, or the appearance of conflict (e.g., accepting gifts from external vendors; contracting relatives to do work for WPI), between their personal interests and the interests of the university.

Examples of typical conflict situations are:

1. The current or potential involvement of the employee, or a member of his or her family, in a financial or other relationship that affects, or potentially could affect, his or her independent, unbiased judgment in the discharge of his or her duties to the university. A conflict of interest could arise, for example, from an employee's compensated service as a consultant to, or membership on, a board of directors or a managerial role with respect to an entity doing business with the university.
2. The possession on the part of the employee, or a member of his or her family, of a significant ownership interest in an organization conducting business with the university.
3. Receipt of gifts or other payments or services of financial value from persons or entities doing business with the university other than those specified under "Gifts and Entertainment."

"Family" members shall mean spouse, parents, siblings, children, grandparents, grandchildren, aunt/uncle and their spouse, niece/nephew and their spouse, any in-laws, step relationships or persons living in employee's same household.

Reporting Conflicts of Interest

While all WPI employees are required to avoid conflicts of interest or the appearance of conflicts, certain individuals are required to disclose annually the existence or absence of defined conflict situations. These employees include all faculty and designated exempt staff.

Faculty, division heads, and other designated individuals (including staff who are elected officers of the corporation and those having signature authority for the university) will file an annual written disclosure of conflicts of interest or situations having the appearance of conflict with the Provost's Office (faculty) or the Compliance Office within the Division of Finance and Operations (designated exempt staff) on forms provided by the university, but are required to report promptly all conflicts of interest whenever they arise.

Questions will arise as to whether a specific situation constitutes a conflict of interest. Employees are urged to conduct themselves cautiously and, whenever in doubt, to report the situation to the General Counsel.

Failure to disclose a reportable interest or relationship or neglecting to comply with the university's requirements for managing a determined conflict of interest may subject the employee to disciplinary action.

Resolving Conflicts of Interest

With respect to faculty, the Provost and the General Counsel will determine appropriate and necessary actions. With respect to staff, the General Counsel and the Executive Vice President will consider appropriate actions.

Questions & Answers

I intend to use outside printing services to develop the layout for a new student services brochure to be issued next semester. My wife runs a printing and design shop that can perform this type of work. Can I direct the business to her?

No. There exists a potential conflict of interest since by providing this job to your wife (or any other family member or persons living in your household) you might personally benefit. Also, this situation could affect your unbiased judgment in selecting the most qualified print shop for the project. Therefore, you should not negotiate or approve a contract with the shop.

I have an outside consulting practice that solicits business from several sponsoring agencies that provide funding awards to WPI. Do I need to disclose this relationship?

Yes. This relationship must be disclosed via the annual disclosure process to determine if any potential conflict exists between your outside business and WPI in terms of competing for similar awards of projects and funds from these agencies. Work performed by a university employee in a self-owned business or as an employee of an outside business which directly or indirectly places the university at a financial or competitive disadvantage will not be permitted.

I am a computer systems support staff person to several departments on campus. Last week, one of the department's managers asked me if I could come over to his house that weekend and assist with some set up work on his personally owned computer he recently purchased. I found it hard to say no to his request since I perform the same function for the university. Is this a conflict of interest on his part?

Yes. This would constitute a conflict of interest. Supervisors may not make such requests. This situation can be compared to one in which a supervisor receives a gift from a vendor. Many such gifts are forbidden by our policies because they may cause the supervisor to feel beholden to the vendor or give the vendor power to coerce the supervisor. In the case of an employee, receipt of a "gift" of the employee's time creates the same opportunity for a conflict of interest, where the obligation of loyalty to WPI becomes secondary to other interests. This is true even if the work is, or appears to be, performed voluntarily; it need not be coerced to be wrong.

I am a researcher at the university who is involved in a start-up company in which I own a 5% interest. Do I need to disclose this?

You need to report your interest if the company conducts or is likely to conduct business with the university. This question is specifically asked on the annual disclosure statement.

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Student Loan Principles

WPI voluntarily abides by the U.S. Department of Education's proposed rules regarding preferred lending lists and prohibition of inducements. The key elements of WPI's compliance include:

1. Protecting student and family choice of lenders;
2. To base lists of preferred, recommended, or suggested lenders solely on the best interests of the student or parent borrowers, considering factors such as interest rates, fees, and loan benefits provided by the lender to the borrower;
3. To not request or accept any payments or benefits of any kind from a lender in exchange for being included on a preferred or recommended lender list or in exchange for the school recommending the lender to its students or parents;
4. To clearly and fully disclose to students and parents the criteria process used to select the lenders for preferred, recommended, or suggested lender lists;
5. To ensure that employees of lenders who make loans to students or their parents do not identify themselves as employees of WPI and that employees or agents of a lender, servicer, or guaranty agency do not work in or provide staffing to WPI's Financial Aid Office unless they do so at a fair market value; and
6. To ensure that WPI's employees do not receive any gift, including travel gifts, of more than nominal value from any lender, servicer, or guaranty agency.

Vendor Relations / Fair Trade

WPI's departments act on behalf of the university in many procurement matters. All faculty and staff should observe the following with regard to vendor relations:

- Extend full primary consideration to the objectives and policies of the university.
- Strive to obtain the maximum value for each dollar of expenditure.
- Demand honesty in sales representation, whether offered through the medium of a verbal or written statement, an advertisement, or a sample of the product.
- Negotiate with vendors in good faith.
- Make reasonable efforts to arrive at an equitable and mutually beneficial agreement that is in the best interests of the university when settling any controversy with a supplier.
- Avoid activities that would denote the appearance of preferential treatment.

A "vendor" is any firm, corporation, company, or individual with whom WPI presently, formerly, or potentially conducts business.

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Questions & Answers

A family friend is involved in the sale of an item that the university frequently purchases from another vendor. Could I ask the university to consider switching vendors?

While it is possible that such a vendor may offer attractive goods and services, the university wishes to avoid such relationships as they may create the appearance of a conflict of interest.

A department has a need for a piece of equipment that is valued at \$10,000 or more (capital equipment). Is it permissible to commit the university to purchasing the item from a certain company prior to obtaining the required bids?

No. Federal regulations relating to grants require that three bids be received for the purchase of equipment in excess of \$10,000. However, if three bids can not be obtained there must be written justification for not obtaining the required number of bids.

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Gifts and Entertainment

Gifts made to university employees may be in the form of entertainment, social invitations, sporting events, favors, personal property, services, or discounts. Gifts from vendors, contractors, and others conducting business with WPI are most often given as a gesture of goodwill and appreciation, but all faculty and staff should be aware that gifts are generally given with the intent to influence a business decision. This behavior is customary business practice, but such activity serves no useful purpose and can create conflicts of interest. It is the obligation of the employee responsible for a business relationship to handle gifts properly and in accordance with university policy as stated below.

University employees (and family members of university employees) may not accept gifts of more than a token or nominal value (generally, \$100 or under) from a supplier or vendor under any circumstances. University employees must refrain from accepting gifts of any value when the gifts give the appearance of impropriety.

University policy prohibits the offering of a gift or entertainment by WPI employees that could in any way be construed as wrongfully or unfairly attempting to influence a decision that would benefit either WPI or its employees. The expenditure of university funds for gifts to employees or students other than those provided through authorized recognition programs is prohibited. For further information, please refer to the university's Business Expense Policy, as posted on the Division of Finance and Operations' website.

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Questions & Answers

A vendor servicing my department treats me to sporting events three or four times a year. Is this appropriate?

No. An individual event may have a nominal value, and if so would be acceptable, but the circumstances change when frequency becomes an issue and thus increases the total value of such gifts. Since the value and frequency of this vendor's gift are significant and could influence your business decisions, you should not accept the invitations.

A consultant working with the university has offered to let me stay at his vacation home on Cape Cod for the weekend. Should I accept the invitation?

No. This gift would have more than a \$100. value and acceptance would give the appearance of impropriety, so it would be inappropriate for you to accept the invitation.

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Proper Accounting

Sound business practice calls for each member of WPI's faculty and staff to assume responsibility for safeguarding and preserving the assets and resources of the university. The following policy statements pertain to all business activities of the university and are applicable to all members of the faculty and staff. It is the responsibility of all supervisors to ensure that their staff is aware of and familiar with these policy statements.

1. All revenues generated by university activities and all expenditures for goods and services must be recorded and accounted for within WPI's (Banner) financial records system.
2. The university financial system consists of the general ledger and all subsidiary systems (manual and automated) that serve as the basis for ledger entries. All transactions, whether recorded directly into the general ledger or entered through a subsystem, should be transcribed in a way that allows for the preparation of financial statements in conformance with Generally Accepted Accounting Principles (GAAP). The University's Controller is responsible for the accuracy, integrity, and overall management of the university's financial system and should therefore be consulted on any matters relating to accounting policies and procedures.
3. The recording of all financial transactions must be timely and accurate, clearly identifying the true business nature of the transaction. Specific guidance pertaining to

the timely posting of transactions for fiscal year-end is provided in a memorandum to all departments from the University's Controller in May of each year.

4. No transaction, whether recorded directly into the general ledger or indirectly from a subsystem, nor any supporting documentation, shall be deliberately left incomplete or distorted. No payments made on behalf of the university are to be approved with the understanding that any part of such payment is for any purpose other than that described on its supporting documents.
5. The use of university funds or assets for any unlawful or improper purpose is prohibited. For further guidance on the allowability of particular expenses, please refer to the university's "Business Expense Policy," as found on the Division of Finance and Operations' website.
6. No unrecorded or undisclosed bank accounts are to be established by individual departments, or others acting on their behalf for the purpose of funding, or to assist in funding, any university activity.
7. Each fund in the university's financial records system has been assigned a "financial manager" - usually a department head, principal investigator or designated administrator.

It is the express responsibility of every employee responsible for an account, or Project/Grant to:

- Assure that periodic reports of account activity are reviewed to determine that all charges and entries are accurate and complete.
 - Verify that all entries made to each account have been properly allocated, representing expenses for activities that pertain to the purpose of the account.
 - Take appropriate action to correct any improper charges allocated to an account by notifying a staff member in the Division of Finance and Operations.
 - Ensure that all charges to government and other restricted sponsoring agency accounts are appropriate and allowable under the sponsors' regulations.
8. All budget projections provided by those responsible for an account must properly reflect activity posted to the (Banner) financial records system and accurately represent all known activity being recorded through any subsidiary system.

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Questions & Answers

Although I have been designated the "financial manager" for a particular university account, time constraints prevent me from reviewing account activity in detail. Is it acceptable for me to assign this task to a staff member?

Yes. It is acceptable to assign the task. You do, however, remain responsible for ensuring that that person carries out the task accurately.

In the process of providing budget projections, I overlooked the fact that \$2,500 of revenue would not be realized due to a cancellation of an order. Does this constitute a violation of the policy?

No. Neglecting to report an event that was unknown to you is not considered a violation. Intentionally failing to factor this event into your projections once known, however, would be regarded as a violation.

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Misuse of University Assets & Reporting Suspected Fraud

WPI places a high level of trust in you, its faculty and staff, and requires that university assets under your control be protected and properly safeguarded from loss and misuse. This responsibility rests with employees at all levels and throughout all departments. Employees cannot take or use for their personal benefit property belonging to the university. The university's property includes its confidential information. Employees may not, therefore, use for their own benefit or for the benefit of their family, or disclose to others, confidential university information except in the proper performance of their employment duties.

The overwhelming majority of university personnel are ethical and well intentioned and do their best to conduct business activities at the highest level of propriety. However, under certain circumstances, fraud may occur. Fraud is defined as "an act of deceiving or misrepresenting in order to secure unfair or unlawful gain." Embezzlement is defined as "to appropriate (as property entrusted to one's care) fraudulently to one's own use."

Fraud takes many forms. Examples of fraud include untruthful fraudulent financial reporting to hide poor business results, expense report falsifications, dishonest or false worker compensation or insurance claims, kickbacks, bid rigging, misuse of university purchasing and travel credit cards, or theft of assets.

Fraud undermines trust and depletes the university and the department involved of vital resources needed for operations. Every member of the WPI community, regardless of his or her position, is expected to cooperate and assist in preventing or identifying fraud.

Policy on Reporting Fraud

Sound business conduct requires that each employee, as a basic condition of employment, assume responsibility for safeguarding and preserving the assets and resources of WPI, particularly those for which he or she is responsible. The following policy statements serve to remind us of that basic commitment and responsibility.

1. All revenues generated by the university, and all expenditures for goods and services, must be recorded and accounted for within the financial accounting system of the institution.
2. No false entries are to be made in the accounting records of the university for any reason. Moreover, no payment on behalf of the university is to be approved or made with the understanding that any part of such a payment is to be used for any purpose other than that described by the documents supporting the payment.
3. The use of university fund or assets for any personal or unlawful purpose is prohibited.
4. The use of any university equipment, supplies, or facilities for a revenue generating activity that benefits an individual employee is prohibited.
5. No person in a supervisory or management position is to use the authority of that position to assign an employee to perform non-employment-related tasks.
6. Managers have a responsibility to develop and implement controls to minimize opportunities for fraud to occur.

As a member of the WPI community, you are expected to report any instances of suspected fraud to the General Counsel. If an instance of suspected fraud is initially reported to a supervisor, department head, director, dean, vice president, or other responsible person, that person is to report the instance to the General Counsel. Suspected research misconduct should be reported to the Provost. Any theft of physical assets should be reported to the WPI Police at 508-831-5433.

It is the policy of WPI that any person is free to lawfully disclose whatever information supports a reasonable belief of suspected employee misconduct. The university will not tolerate retaliation toward or harassment of employees who report actual or possible misconduct. An employee may not retaliate against an employee who has made a disclosure and is also prohibited from directly or indirectly using the official authority of his or her position or office for the purpose of interfering with the right of an employee to make a disclosure. Such disclosures can be made to the General Counsel, the employee's immediate supervisor, other appropriate administrator, or the anonymous third party reporting provider described below.

**Situations may exist where members of our community feel uncomfortable discussing these matters with their colleagues, supervisors, or the General Counsel. To assist with these particular situations, the University has an agreement with a third party anonymous reporting provider, EthicsPoint, Inc, to maintain a WPI internet application and call center for individuals to report any concerns related to financial, regulatory, compliance, environmental health and campus safety matters. The EthicsPoint's application is designed to ensure that any communications will remain completely confidential in accordance with the wishes of individuals who make reports using this option. You may access this reporting option on the internet by clicking on the WPI/EthicsPoint Anonymous Reporting Hotline link, the Anonymous Fraud Reporting link on the Division of Finance and Operations' web page, or by going directly to the EthicsPoint website.*

*** The above process does not exist at this time. We anticipate the process will be operational by January, 2008.**

If presented with reasonable evidence of a suspected fraud, the General Counsel will conduct an investigation to determine if the reported suspicions of fraud are valid. The General Counsel will also inform the supervisor of any employee under investigation. If, based on the results of the investigation, the General Counsel believes that fraudulent activities have occurred, he or she will report the findings as appropriate, to the President, the Executive Vice President, the Provost, the Vice President for Human Resources, the Controller, and the Director of Public Safety/Chief of Police. All determinations of significant fraudulent activities will be reported in a timely manner to the Audit Committee of the Board of Trustees. The University will prosecute such activities to the fullest extent allowed by the law.

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Questions & Answers

What should I do if I notice that goods being ordered by a coworker for personal use are being charged to a department account?

The misuse of university assets for personal gain is improper and considered fraud. You should report your suspicions to your supervisor, department head, or the General Counsel as appropriate.

I recently witnessed one of my fellow employees submitting false receipts for business travel. What can I do?

Report what you have seen to your supervisor, department head, or the General Counsel, as appropriate, for investigation and follow-up.

I'm aware of fraudulent activity taking place at the university that I'd like to see stopped but don't want to get involved. Is there any way I can proceed?

The university encourages all faculty and staff members to come forward with any and all honest allegations of fraud or suspected fraud. However, employees may submit information anonymously to the Provost, the General Counsel, or through the above referenced anonymous third party reporting provider.

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Information Technology Acceptable Use Policy, Network Security Policy and Information Security Compliance Program

The use of WPI computing and communications resources, like the use of any other university-provided resource, is subject to the normal requirements of legal and ethical behavior within the university community. The Acceptable Use Policy applies to all users of university technology resources, and to all uses of those resources, whether on campus or from remote locations.

- WPI computing and communications resources may only be used by authorized persons for legitimate purposes relating to teaching, learning & research, and university administration. No one may use WPI's technology resources for inappropriate or illegal purposes such as playing practical jokes, circulating chain letters, introducing viruses, wiretapping, packet sniffing, circumventing security, downloading and distributing child pornography, and activities such as cyber stalking. As stated above, the University will take legal action to the fullest extent commensurate with the violations and as determined by the courts.
- Commercial use of these resources, except for authorized WPI business, is prohibited. Reselling of university technology resources or services is, in almost all cases, not permitted.
- Users are responsible for complying with the requirements of the contracts and licenses applicable to the software and other data they install on university or personal systems. Copyright violations, especially of downloaded material or shared software, are of particular concern. Proof of legal licensing should be made available upon request.
- Users may utilize only those computing resources that they are authorized to use and use them only in the manner and to the extent authorized. No one may share individually assigned accounts and passwords under any circumstances, not even with supervisors, family members, or CCC or university staff. No one may share use of an account, personal computer or network connection for the purposes of providing network access to unauthorized individuals.

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WPI employs various measures to protect the security of its computing resources and of users' accounts. Users should engage in "safe computing" practices by establishing appropriate access restrictions for their accounts, guarding their passwords and changing them regularly, backing up files and using virus protection. Because university computing resources are university property, uses of those resources are not private but may be monitored by the university in appropriate circumstances. While the university does not routinely monitor individual usage of its technology resources, the normal operation and maintenance of the university's resources require the backup and caching of data and communications, the logging of activity, the monitoring of general usage patterns, and other such activities that are necessary for the provision of service.

The complete text of the Acceptable Use Policy and the Network Security Policy are available online at the following links:

www.wpi.edu/Pubs/Policies/AUP

www.wpi.edu/Pubs/Policies/netsec.html

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Questions & Answers

I have been issued an e-mail account to assist me in performing my job with the university. Is it a problem if I occasionally direct e-mail of a personal nature to colleagues outside the university?

WPI has made a substantial investment in the data network and servers that enable its faculty and staff to correspond via electronic mail. While the university recognizes that occasional use of this infrastructure for personal purposes will not disrupt its functionality, it expects that e-mail users will respect the priority of business communications and keep personal correspondence to a minimum.

My spouse and children have become very interested in the Internet. Is it possible for me to let them use my WPI computer account in the evening hours to access the World Wide Web or to create their own home pages?

No. WPI computer accounts are issued for use only by the individual assigned to the account and should only be used to conduct university business. For security purposes, you should not divulge your account password to anyone. Moreover, it is not acceptable for you to allow others to use your account, even during off hours. The university data infrastructure is in heavy demand by students, faculty, and staff at all times.

I am going on vacation for two weeks and have given my user ID and password to a coworker so that she can review my e-mail messages and attend to urgent business. Is this acceptable?

No. Giving another person your password constitutes a violation of university policy. The best solution in cases of absence is to ask the CCC Helpdesk for assistance to arrange forwarding of your e-mail to the mailbox of someone else for review.

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WPI's telecommunications systems - its computers, servers, wired and wireless data networks, and phone systems – are essential tools for conducting the day-to-day business of the university. Data processing, data storage, and electronic communications technology have made it possible for WPI to more effectively and efficiently perform such essential tasks as registering students for courses, recording their educational records and academic progress and managing the complexities of WPI's financial data.

However, all these technologies have risks as well as benefits. One of the greatest concerns about the use of systems that store and transmit information electronically is the increased risks that data will be intercepted, stolen, or corrupted; that confidential information will be inadvertently released to those who should not see it; and that individual rights will be violated.

WPI takes seriously its obligation to operate its electronic data and communications systems in a secure manner. It has developed a host of policies and guidelines that outline procedures that should be followed by members of the WPI community to assure the university lives up to that obligation.

As part of an extensive Information Security Compliance Program, WPI has created the following referenced policies to respond to seven federal acts that deal with a wide range of legalities associated with information security. Compliance with these seven acts has significant financial and legal implications. The entire WPI community is encouraged to learn more about these acts and gain an appreciation of the direct link between technical security and compliance. The *policies* can be reviewed at the following links:

1. *Policies for the Family Educational Rights and Privacy Act (FERPA)* – www.wpi.edu/Admin/Registrar/ferpa.html

www.wpi.edu/Pubs/Policies/ferpaguide.html

2. *Policies for the Health Insurance Portability and Accountability Act (HIPAA)* – www.wpi.edu/Admin/HR/BenMan/privacy.html

www.wpi.edu/Admin/Health/Eligibility

www.studentinsurance.net/publicPrivacy.asp

3. Financial Records and the Gramm-Leach-Bliley Act (GLBA):

Since WPI holds many sources of customer financial information, the above act requires personnel and systems be trained and in place for proper communication, security and storage of such information. Compliance is evidenced through the university's FERPA policy referenced above.

4. Digital Millenium Copyright Act (DMCA) – www.wpi.edu/Pubs/Policies/Copyright

5. *Policy for the Technology, Education, and Copyright Harmonization Act (TEACH)* – www.wpi.edu/Pubs/Policies/Copyright

6. *Policies for the Electronic Communications Privacy Act (ECPA) and the Computer Fraud and Abuse Act* – www.wpi.edu/Pubs/Policies/AUP and www.wpi.edu/Pubs/Policies/netsec.html (referenced earlier)

7. *Policy for The USA Patriot Act* (including WPI's policy on information requests) - www.wpi.edu/Pubs?policies/patriot.html

Use of Worcester Polytechnic Institute and WPI Name and Insignias

The name "Worcester Polytechnic Institute" and "WPI" and how they are used affects both the university as a whole and the individual members of the university community. Appropriate use of the name and insignias can benefit all, while inappropriate use may reflect negatively on both the institution and its individual members.

Because of these far-reaching implications, oversight regarding the use of the university's name and insignias, and the names of departments and programs within the university, will be conducted on an institutional level according to the principles and guidelines outlined in this policy.

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I. General Guidelines and Procedures

1. Any use of the university's name and insignia must be submitted to, and approved in advance by, the Vice President for Marketing and Communications.
2. In considering any proposed use, university officials will be guided by the principles outlined above, specifically:
 1. whether the association between the university and the activity, project or publication is accurately represented and whether appropriate mechanisms are in place or can be put in place to ensure that the representation continues to be accurate;
 2. whether the manner in which WPI's name is used is consistent with its educational mission and will result in a positive effect on the image of the university;
 3. whether suitable arrangements have been made or can be made for the university to realize a benefit, financially or otherwise, from the use of its name;
 4. whether the university will incur any potential liability from the proposed use of its name.

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II. Guidelines for use of the university's name by faculty, staff, students and alumni

1. Faculty members and staff may use the Worcester Polytechnic Institute and WPI name to identify themselves on stationery, business cards, publications in research or educational journals and other materials used in the course of their university-related activities (e.g. John Smith, Professor of Mathematics, WPI.) Students and alumni may wish to identify themselves as students or graduates of the university in biographical information. In using or authorizing use of the Worcester Polytechnic Institute and WPI name to identify themselves in connection with academic activities conducted with outside individuals or entities (e.g. authoring a book), members of the WPI community should assure that the WPI name is used in a manner that does not imply university endorsement or responsibility for any particular activity, project or product. For example, when authoring a book, a faculty member may state his or her academic appointment at WPI on the inside of the book or book jacket. The name of the university should not appear on the cover of the book. Likewise, the name of WPI may not be used in the title of any journal or other publication without the express permission of the university. Such permission will not normally be given in any circumstance where the university does not retain exclusive editorial control over the publication.
2. All other proposed uses of the Worcester Polytechnic Institute and WPI name by faculty and staff and any use of the name by students and alumni should be submitted to the Vice President for Marketing and Communications for approval.

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III. Guidelines for use of name by individual divisions and departments

Divisions and departments may use the name of Worcester Polytechnic Institute and WPI, or the name of their division/department, in the following activities:

Stationery, business cards and other materials used by the division/department in the course of their university-related activities;

Any content in printed, electronic or multimedia form in which the division/department involved regularly communicates with their constituencies, including course catalogues and related materials, "home pages" on the World Wide Web and similar publications issued by the division/department;

Course materials and any materials prepared for use in connection with courses conducted at the university, whether in printed or digital form.

In any such uses, the division/department involved should take care that its use does not adversely affect other divisions/departments or the institution as a whole. Ultimately the Vice President for Marketing and Communications has the right to review and determine the appropriate use of the Worcester Polytechnic Institute and WPI name.

Any other use of the university's name or the name of the individual division/department will require approval as outlined in Section II(2) above. In particular, prior approval is required if the use of name involves the sale or distribution for financial consideration of a product or service or the granting of a license for use of the name on merchandise, including but not limited to apparel, software or electronic media.

Any news, marketing and/or publicity materials designated for dissemination to media channels and extended audiences of elected/appointed officials, investors, donors, and others concerning official university matters requires up-front involvement (at the planning stages) with the Vice President for Marketing and Communications. The Vice President for Marketing and Communications, working with the mandate and approvals of the university's administrative leadership team, must review any materials and information targeted at the media. The Vice President for Marketing and Communications should be an integral part of any continuing external publicity or marketing outreach by other parties if it involves the use of the Worcester Polytechnic Institute and WPI name, insignias, or affiliation, etc.

Use of the university name, seal, or logo on letterhead and business cards is standardized and regulated by the Division of Marketing and Communications.

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IV. Questions and Answers - Principles

Questions & Answers

Are the names "Worcester Polytechnic Institute" or "WPI" trademarked?

Yes. WPI owns federal trademark registrations on the words Worcester Polytechnic Institute and WPI, on the University seal, and on various marks specific to divisions or departments.

I am a member of the faculty who has been approached by a company. The company would like to put my name and affiliation with WPI on its promotional materials. Is this allowed under the name use policy?

No. Members of the WPI community (students, alumni, faculty, staff) may not use the WPI name to endorse products. WPI trademarks should not appear on products or on advertising relating to products or services. To prevent misuse of the Worcester Polytechnic Institute and WPI name for commercial advertising purposes, for example, faculty who prepare reports for corporations should mark them "personal, not for

publication."

I have started my own company and would like to promote its products by indicating in the advertising that I am a professor or staff member at WPI. Is this permitted?

No. Members of the faculty may reference their WPI affiliation in connection with scholarly activities. This does not extend to the promotion of products or services.

How should a member of the faculty or staff describe his or her affiliation with the University when authoring a book or reviewing a colleague's work?

By stating name, academic appointment, and institution, as in "John Doe, associate professor of Computer Science, Worcester Polytechnic Institute." In using the Worcester Polytechnic Institute or WPI name in connection with scholarly activities outside the university, faculty should ensure that the use does not imply university responsibility for that activity.

A group of WPI students would like to hire a vendor to produce t-shirts bearing the WPI name and seal. Is this permitted?

Yes. This is permissible provided the vendor has a trademark license with the university or permission to produce goods without a license. The group should contact the General Counsel.

I would like to start a journal. May I call it the "WPI Journal of X"?

Only if permission is obtained. Any publication that uses the Worcester Polytechnic Institute or WPI name in the title must be under the exclusive control of the university. Student publications must identify the work as that of a recognized student organization. Other restrictions apply.

Can I mention WPI at all?

Yes. Nothing in the name use policy is intended to discourage fair use of the Worcester Polytechnic Institute or WPI name to comment on the activities of the university. The policy seeks to regulate display of the name in any manner that could reasonably be interpreted as sponsorship or endorsement by the university, that is inconsistent with the research and educational mission of the university, or that could diminish the reputation of the university.