



Texas Christian University Policy

Policy Title: Code of Conduct Policy

Policy Subject: Expectations and standards to guide employees in University activities

Division: Human Resources

Policy Number: 2.070

I. Applicability

This policy applies to 1) individuals who are paid by the University, including officers, faculty and staff; 2) consultants, vendors, and contractors when they are doing business with the University; 3) trustees; and 4) individuals who perform services for the University as volunteers. The code of conduct refers to all these persons collectively as “members of the University community” or “community members.”

II. Policy Statement and Purpose

The University is committed to the highest ethical and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the University relies on each community member’s ethical behavior, honesty, integrity, and good judgment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for his/her actions.

This code of conduct describes standards to guide us in our daily University activities. We believe that these standards are already being followed. Our goal is to commit them to writing and to ensure that they are understood by the community.

III. Policy Definitions

There are no policy definitions.

IV. Policy

Compliance with Laws and University Policies

The University and each community member must transact University business in compliance with all laws, regulations, and University policies related to their positions and areas of responsibility. Understanding and following these standards can be complex, such as in the areas of purchasing, use of technology, and employment matters. Only designated officers are authorized to sign contracts or authorize certain personnel actions.

In addition, community members are expected to behave in a manner which respects the freedom of others as well as refraining from interfering with, obstructing or disrupting a normal University activity, even while exercising their own freedom of expression. Managers and supervisors are responsible for teaching and monitoring compliance in their areas.

Reporting Suspected Violations or Concerns and Whistleblower Protections

- **General**: The code of conduct requires the University community to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to comply with all laws, regulations and University Policies. The University's compliance efforts focus on teaching members of the University community the appropriate compliance standards for the areas in which they work. Nevertheless, violations may occur. In addition, members of the University community may have concerns about matters that they are not sure represent violations. This section describes community members' responsibilities for reporting violations, suspected crimes or concerns, and how these responsibilities may be carried out.
- **Reporting**: It is the responsibility of each community member promptly to report violations or concerns about violations of laws, regulations and University policies that come to his/her attention. Managers have a special duty to adhere to the standards set forth in this code, to recognize violations, and to enforce the standards. Disciplinary actions for proven violations of this code of conduct, for reporting in bad faith or for retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may result in discipline up to and including termination of employment or dismissal from a volunteer position. Individuals who violate the code may also be subject to civil and criminal charges in some circumstances.
- **No Retaliation**: No member of the University community may interfere with the good faith reporting of suspected or actual violation; no individual who makes such a good faith report shall be subject to retaliation, including harassment or any adverse employment, academic or educational consequence, as a result of making a report.
- **How to Report a Violation, a Crime, or Discuss a Concern**: All suspected crimes, including child abuse, must be reported immediately. On campus, call TCU Campus Police at 817-257-7777; off-campus call 911 or the Department of Family Protective Services at 1-800-252-5400. You are responsible to report violations or concerns to your immediate supervisor or department head or to the University Ethics Officer at 817-257-6222. The independent Ethics and Compliance Hotline at 1-844-996-0832 is also available. Reports may be made anonymously to the Hotline if the caller so desires.

For matters dealing with one of the specific areas below, you may call the extension indicated on the compliance officer website below, or you may call the Ethics and

Compliance Hotline or the University Ethics Officer. Contact information for TCU Compliance Officers can be found at <http://www.hr.tcu.edu/compliance-officers/>

- **Acting in Good Faith:** Anyone reporting a violation, suspected violation or concern must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- **Confidentiality:** Violations or suspected violations may be submitted on a confidential basis by the community member. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Conflicts of Interest

This policy addresses situations where there might be a potential financial or personal conflict, or the appearance of such a conflict, between a particular outside interest of a member of the University community and the obligation that the community member owes to the University such that the community member's profit or advantage may be, or may reasonably appear to be, at the expense of the well-being of the University.

A copy of the Conflict of Interest Policy, Disclosure Guidelines and Procedures, and Disclosure Report may be obtained from the Human Resources website at <http://hr.tcu.edu/employeeservices/faculty-staff/policies-procedures/>.

Financial Conflicts of Interest in Externally-Funded

Research For all persons, including TCU employees, TCU undergraduate, graduate or post-doctoral students, sub-recipient personnel, collaborators and consultants who are involved with externally sponsored programs at TCU and meet the definition of "Investigator" or "Senior//Key Personnel", please refer to the Financial Conflict of Interest Policy that governs externally funded research. A copy of this policy and all corresponding procedures and forms may be obtained from the Office of Sponsored Programs website at <http://research.tcu.edu/sponsoredprograms/policies-and-procedures/>.

Confidentiality

The University maintains confidential records for a variety of business needs. Records include detailed information about clients undergoing tests or receiving treatment, students, job applicants, employees, finances, and future planning. Many records, such as medical records and student records must be kept confidential as a matter of federal law. Other information, including social security numbers, must be kept confidential to protect the privacy of individuals doing business with the University.

Members of the University community are expected to protect this information by safeguarding it when in use, storing it properly when not in use, and discussing it only

with those who have a legitimate business need to know. Community members who are uncertain about the use of University records and information should contact their supervisors.

Outside Employment

Outside professional commitments should not interfere with a community member's obligations to the University. No member of the University community shall accept outside employment that actually or potentially results in any conflict of interest with or intrudes upon or detracts from his or her responsibilities to the University, or the programs, policies and objectives of the University.

Environmental Health and Safety

The University must comply with government rules and regulations that protect the environment and promote workplace safety. The University must operate its facilities with all of the necessary permits, approvals, and controls, especially with respect to handling and disposal of hazardous and bio hazardous materials and waste.

Anyone working with or around these materials must be familiar with the rules, regulations, and policies that apply to them.

Contact the Environmental Health and Safety Office at 817/257-6363 or <http://www.saf.tcu.edu> for assistance and answers to questions.

Human Resources Matters (including equal employment, harassment, etc.)

The University is committed to a work environment free of harassment and disruptive behavior, and to providing an equal opportunity work environment where every member of the University community is treated with fairness, dignity, and respect. No one shall discriminate against any individual on the grounds of race, color, religion, sex, age, disability, national origin, sexual preference or any other factor prohibited by law or University policy.

All members of the University community, especially supervisors, must be familiar with laws, regulations, and policies related to employment matters. Some of the relevant University policies on employment matters include: 1) the policy against harassment, including sexual harassment (TCU Policy 1.005) and 2) the policy on equal opportunity (TCU Policy 1.001). All reports of suspected harassment must be reported immediately to supervisors who are then responsible for working with Human Resources and the University Sexual Harassment Officer to ensure compliance with applicable University policy. Assistance is available from the Office of Human Resources at 817/257-7790 and <http://www.hr.tcu.edu>.

Sponsored Research Grants and Contracts

The University receives grants and contracts from federal and non-federal sources. Faculty and staff who are involved in federally sponsored research must strictly follow federal rules and regulations related to that work including but not limited to human and animal subjects federal regulations and federal and state costing regulations. Failure to observe government rules and regulations can result in the loss of funds from grants and contract, and, in some instances, civil fines and criminal penalties. With respect to grants and contracts from non-federal sources, the University expects compliance with their requirements. Compliance support is available from the Director of Sponsored Programs at 817/257-7516 and <http://www.research.tcu.edu>.

University Documents

Every member of the University community is responsible, within the scope of his/her work, for the integrity and accuracy of the University's documents and records. No one may falsify or improperly alter information on any record or document.

Workplace Health and Safety

The University seeks a healthy and safe environment for all members of the University community and for visitors. Every community member is obligated to perform his or her job in a safe manner and to follow all safety rules and procedures. Community members should immediately report any hazardous conditions or job-related illness or injury to their supervisors. Assistance is available from the Director of Safety at 817/257-6363 and <http://www.saf.tcu.edu>.

Drug and Weapon Free Workplace

The unlawful possession of a weapon or the unlawful manufacture, distribution, possession, or use of a controlled substance in or on any premises or property owned or controlled by the University is prohibited. Any member of the community who is found guilty (including a plea of no contest) or has a sentence, fine, or other criminal penalty imposed by a court for any offense involving a weapon or a controlled substance that occurred in or on University property shall report such action to his or her supervisor or to the Office of Human Resources at 817/257-7790 within five (5) days.

Any member of the University community who unlawfully manufactures, sells, distributes, possesses, or uses a controlled substance on University property, regardless of whether such activity results in the imposition of a penalty under a criminal statute, will be subject to appropriate disciplinary action up to and including termination, or will be required to participate satisfactorily in an approved drug assistance or rehabilitation program or both.

V. Enforcement

Reports of possible violations will be directed to the Division of Human Resources for review to be conducted in coordination with the Office of Compliance.

VI. Administrative Responsibility

The Office of Human Resources is responsible for administering and interpreting this policy.

VII. Policy History

Date Issued: April 22, 2005

Date Last Revised: October 16, 2012

VIII. Related Policies

- a. Policy 1.001: Affirmative Action and Equal Employment Opportunity Policy
- b. Policy 1.005: Policy on Prohibited Discrimination Harassment and Related Conduct
- c. Conflict of Interest Policy
- d. Financial Conflict of Interest Policy

IX. Appendix

There are no appendices.

X. Approved By and Approval Date

Approved by Chancellor's Cabinet, April 22, 2005