



# **Standards of Professional Conduct and Integrity**

Audit & Management Advisory Services  
University Legal Counsel

April 2018



## **Introduction**

Dear members of the Tufts Community,

It is important for us to sustain our resolve and commitment to the Standards of Professional Conduct and Integrity (the “Standards”).

The Standards serve as a proxy for the University’s shared values: honesty, integrity, respect and inclusion. These values define what it means to be at Tufts and also guide our behavior.

Please take this opportunity to review the Standards and renew your commitment to upholding them. If, at any point, you come to believe that the Standards are not being upheld or respected, please speak up so that we can take appropriate action.

Sincerely,

Anthony P. Monaco  
President, Tufts University

## **Standards of Professional Conduct and Integrity**

### **Tufts University Mission Statement**

Tufts is a student-centered research university dedicated to the creation and application of knowledge. We are committed to providing transformative experiences for students and faculty in an inclusive and collaborative environment where creative scholars generate bold ideas, innovate in the face of complex challenges and distinguish themselves as active citizens of the world.

To further the University’s mission, all members of the Tufts community are expected to conduct themselves ethically, fairly, and honestly. Even the appearance of misconduct or the perception of impropriety can be damaging to the University’s reputation and detract from its core mission.

Like all institutions, Tufts operates in an increasingly complex legal and regulatory environment. Despite our best efforts to make the Standards comprehensive, it is impossible to describe every possible ethical or legal scenario you might face. Instead, we expect members of the Tufts community to use the Standards as a baseline for exercising good judgment and as a tool for learning more about our policies. The Standards also provide guidance in using our University resources prudently, in accordance with our students’ expectations and those of all members of our university community.

### **Who Must Follow the Standards?**

The University expects all employees (full and part time faculty and staff) to follow the Standards. Tufts also expects its contractors, consultants and vendors who are temporarily assigned to perform work or services for Tufts to follow the Standards while on our campuses.

### **What If I Have Questions or Concerns About the Standards?**

Resources & Reporting Options. If you have questions or concerns about the Standards, you can contact any of the senior leaders of the following departments:

- Department of Audit & Management Advisory Services
- Department of Human Resources
- Office of the Executive Vice President
- Office of Equal Opportunity
- Office of the Vice Provost for Research
- Office of University Counsel

### **Anonymous Reporting Options**

If you prefer to report your questions and concerns anonymously, you can do so by filing online through EthicsPoint at <https://secure.ethicspoint.com/domain/media/en/gui/7182/index.html> or by calling the EthicsPoint hotline at 1-866-384-4277. EthicsPoint is the University's reporting system for activities that involve unethical or otherwise inappropriate behavior.

### **No Retaliation**

Individuals who report questions and concerns about the Standards and their compliance in good faith and others who may be considered to be whistleblowers can be assured protection against retaliation.

### **What Are the Standards?**

**The Standards of Professional Conduct and Integrity are:**

- 1. Respect Others**
- 2. Maintain Confidentiality and Privacy**
- 3. Avoid Conflicts of Interest**
- 4. Use of University Resources**
- 5. Financial Reporting**
- 6. Vendor Relations and Fair Trade**
- 7. Compliance with Laws, Regulations and University Policies**
- 8. Ethical Conduct of Research**

## **1. Respect Others**

We aspire to be an inclusive community of colleagues in which mutual respect guides our day-to-day interactions – not only with students, but also with one another.

The University prohibits discrimination and harassment on the basis of race, color, national or ethnic origin, age, religion, disability, sex, gender, sexual orientation, gender identity and expression, veteran status or any other characteristic protected by federal or state law. All members of the Tufts community are expected to support this policy and to respond promptly and appropriately to any concerns that are brought to their attention.

For more information about the University policies that support this Standard, please see:

- [Non-Discrimination Policy](#)
- [Sexual Misconduct Policy](#)
- [Accommodations Policy](#)
- [Consensual Relationships Policy](#)
- [Tufts University Code of Conduct Involving Interactions with Minors](#)

## **2. Maintain Confidentiality and Privacy**

Faculty and staff at all levels of the organization may be asked to handle sensitive, proprietary or private information about individual faculty members, students, alumni, donors, staff, patients, parents and other parties affiliated with the University. They may also be asked to handle confidential information related to business transactions, grants, contracts or research activities. Such sensitive, proprietary or private information should be used only for the University purposes and should not be disclosed or shared with those who do not have a need to know about the information for such University purposes. If you have a question about how to handle certain types of information ---and in particular, if you are unsure if it is okay to disclose it or use it in a certain matter--- please consult your manager, the TTS Information Steward assigned to your group or the TTS Office of Information Security.

For more information about the University policies that support this Standard, please see:

- [Information Stewardship Policy](#)
- [Tufts Security and Privacy Program](#)

## **3. Avoid Conflicts of Interest**

To avoid conflicts of interest (and circumstances that give rise to an appearance of a conflict), members of the Tufts community should be cautious about engaging in activities where competing loyalties or commitments may cause them to put their own personal interests or the interests of other parties ahead of the University's. For example, outside professional activities, private financial interests or the receipt of benefits from third parties can cause actual or perceived conflicts between the University's mission and an individual's private interests (or the interests of their family and friends). To protect its

mission, encourage transparency, and avoid such conflicts, the University may ask you to file a disclosure form regarding your financial interests or research activities or other professional commitments.

For more information about the University policies that support this Standard, please see:

- [Tufts University Conflict of Interest and Conflict of Commitment Policy.](#)

#### **4. Use of University Resources**

The University's resources must be properly safeguarded from loss or misuse. These resources include everything from Tufts' funds and physical assets (books, computers, vehicles) to its information systems and records (email, enterprise applications, sensitive data) – just to name a few. Tufts' intellectual property (including our name, research results and other trade secrets, trademark, copyright, patents and logo) are among our most valuable assets and may require special authorization prior to their use or disclosure. Faculty and staff are expected to treat University property with care and adhere to the policies and procedures in place for the procurement, use, maintenance and disposal of all such resources.

For more information about the University policies that support this Standard, please see:

- [Intellectual Property](#)
- [Information Stewardship Policy](#)
- [Use of Information Systems Policy](#)
- [Name Use Policy](#)
- [Protecting University Assets](#)

#### **5. Financial Reporting**

The University strives to ensure that all of its institutional records contain complete, accurate and transparent information. The University pays special attention to the accuracy of specific types of records including accounting and financial records, tax reports, expense reports, time sheets, effort reports, and other documents and reports submitted to government agencies. The recording of all financial transactions must be timely, accurate, and clearly identify the true business nature of the transaction. No transaction shall be deliberately left incomplete or distorted. All published financial reports will provide accurate and timely disclosures as required under generally accepted accounting principles.

For more information about the University policies that support this Standard, please see:

- [Finance Division website.](#)

## 6. Vendor Relations and Fair Trade; Signing Authority

Only the Tufts University Purchasing Department is authorized to act on behalf of the University in procurement matters. Individuals with a Tufts University Procurement Card or Corporate Card are registered to use one of the designated on-line purchasing applications and are authorized to make limited purchases on behalf of the University. All other faculty and staff are prohibited from committing University funds or acting as its agent in procurement matters.

Only those who are authorized to sign documents in accordance with the *Signing Authority Policy* may sign documents that bind the University.

For more information about the University policies that support this Standard, please see:

- [Purchasing Guidelines](#)
- [University Bidding Requirements](#)
- [Procurement Card](#)
- [Corporate MasterCard](#)
- [Capital Equipment Authorization Process](#)
- [Signing Authority Policy](#)

## 7. Acceptance of Personal Gifts and Entertainment

In general, faculty members and employees should not accept gifts from businesses and individuals that sell goods and services to the University. “Gifts” do not always come in wrapped boxes. Sometimes “gifts” can come in the form of meals, entertainment, travel, social invitations, tickets to sporting events or performances, favors, personal property, services or discounts.

Such gifts may appear to be a gesture of goodwill and appreciation, but they can also appear to be given as a *quid pro quo*, something that the company or vendor is providing to *you*, so that you will continue to do business with *them*. If you have responsibility for managing business relationships at the university it is your responsibility to handle gifts properly, returning them as needed, especially if the gift is of significant value (in excess of \$50).

Consistent with this commitment, Tufts’ employees and faculty members are prohibited from soliciting any personal gift, gratuity, favor, service, or other benefit (collectively, a “gift”) from individuals or companies seeking any advantageous action by, or relationship with, the University.

Gifts in excess of \$50 or of undetermined value must be employed for a University purpose or shared widely within the University or a unit thereof or, alternatively, must be declined or returned immediately.

For more information about the University policies that support this Standard, please see: [Acceptance of Personal Gifts and Entertainment](#)

## 8. Compliance with Laws, Regulations and University Policies

Tufts takes its responsibilities to comply with laws, regulations and policies seriously. While it is impossible for anyone to know all aspects of every law that could apply in a given situation, as members of the Tufts community you are expected to understand the major laws, regulations and policies that apply to your work.

When a question arises pertaining to interpreting or applying a regulatory requirement, contact your manager or other individuals who have responsibility for compliance in that particular area. The Office of University Counsel is also available to help address compliance concerns should you need additional guidance or advice.

A few specific laws are listed below for your review:

***Anti-Bribery Laws.*** Tufts faculty and staff are not allowed to bribe or offer bribes to foreign officials pursuant to the Foreign Corrupt Practices Act (FCPA). Please refer to the **Anti-Corruption Policy** for additional guidance.

***Export Control.*** U.S. and international trade laws control where Tufts can send certain products and services. The laws in this area are complex and apply to a broad array of imports and exports (including technical data, scientific devices and other “controlled” technologies). Depending on which country you are exporting to (or importing from), the laws may vary. This law may also apply if you have foreign nationals working with you and such persons have access to certain regulated technical data, scientific devices and other controlled technologies.

*If you are involved in sending goods or services from one country to another or have concerns about compliance with export control laws, please be in contact with your manager or the Office of Vice Provost for Research about your compliance responsibilities in this area.*

***Reporting Violations and Protection from Retaliation; Whistleblower Policy.*** It is the policy of the University that any person may lawfully report such person’s reasonable belief that another person, department, school or office is violating or is not complying with an applicable law, regulation or University policy. Members of the University community are strongly encouraged to report all known or suspected instances of non-compliance with regulatory matters or University policies to their immediate supervisor, vice president or dean. No employee may retaliate against a reporter/employee who has made a disclosure and no employee is permitted to directly or indirectly use the official authority of his or her position or office for the purpose of interfering with the right of an employee to make such a disclosure. The University has an agreement with NAVEX Global through its [EthicsPoint](#) reporting service for individuals to report any concerns. There is an option to remain anonymous.

For more information about the University policies that support this Standard, please see:

- [Regulatory Compliance](#)

## **9. Ethical Conduct of Research**

The success of Tufts' research mission depends on the public trust. Accordingly, the University is committed to the highest standards of integrity in the conduct and administration of its research programs. The University has published policies that, in conjunction with federal, state, and local regulations, govern the conduct of research involving human subjects, laboratory and teaching animals, recombinant DNA, infectious agents, radiation, and other hazardous materials. The University also has a general policy covering misconduct in research and scholarship, financial conflict of interest and financial policies that govern spending of research funds.

For more information about the University policies that support this Standard, please see:

- [Office of the Vice Provost for Research web site.](#)
- [Scientific Integrity in Research Reporting](#)

### **Additional Policies Supporting the Tufts University Standards of Professional Conduct and Integrity**

#### **Communications Policies**

Communications policies, including domain name use, university branding, social media and web accessibility, provide guidelines for uniformity in messaging and visual identity across Tufts websites and social media channels.

[Communications Policies](#)

#### **Financial Policies**

Financial policies include those for all employees, such as the Business Conduct Policy, designed to serve as a guide to appropriate business behavior, as well as specialized policies for controllers, bursars, accounting, treasury and purchasing, which provide comprehensive guidelines to fulfill financial tasks in a uniform, secure manner.

[Financial Policies](#)

#### **Department of Public and Environmental Safety Policies**

Public and Environmental Safety policies help to keep Tufts' campuses a safe and healthy learning environment. Requirements for emergency notifications, conducting business with minors on campus, video security and weapons on campus are listed within the policies and enforced on all campuses.

[Department of Public and Environmental Safety Policies](#)



## **Office of Equal Opportunity Policies**

The Office of Equal Opportunity (OEO) administers policies, including non-discrimination, sexual harassment/sexual misconduct, to ensure a safe and welcoming learning and working environment for all members of the Tufts community.

[Office of Equal Opportunity Policies](#)

## **University Counsel Policies**

University Counsel policies are used for broad spectrum of legal issues including operations, litigation, student issues, real property and construction, fundraising, environmental and other government regulations, intellectual property, employment, tenure, finance and investment, academic affiliation, trust administration, and general legal policy.

[University Counsel Policies](#)

## **Employee and Faculty Handbooks**

### **Employees**

The Employee Handbook details the responsibilities of staff members and explains the university's commitment to staff.

[Employees](#)

### **Faculty**

Each school's Faculty Handbook details the responsibilities of faculty members and explains the university's commitment to excellent faculty.

- [Schools of Arts and Sciences and Engineering](#) (Undergraduate and Graduate)
- [The Fletcher School of Law and Diplomacy](#)
- [School of Dental Medicine](#)
- [Friedman School of Nutrition Science and Policy](#)
- [School of Medicine](#)
- Cummings School of Veterinary Medicine