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October 2011

4.603 Employee Code of Ethics

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Type of Policy <input checked="" type="checkbox"/> University <input type="checkbox"/> <i>Campus</i> <input type="checkbox"/> <i>Department/Unit</i> <input type="checkbox"/> <i>Interim</i>		Employee Code of Ethics Policy 4.603	
Human Resource Policies		Effective date: October 11, 2011	
Policy History:	Approved by:	Resolution #	Date:
Approved	Chancellor	N/A	October 11, 2011
Revised (Non-substantive)	Office of General Counsel	N/A	May 17, 2017
Revised (Non-substantive)	Office of General Counsel	N/A	April 13, 2018
Revised	Office of General Counsel	N/A	February 1, 2021
Responsible Office:	Responsible Administrator:	Contact information:	Applies to:
Office of Human Resources	Chief Human Resources Officer	937-769-1375	All Employees

I. Introduction

Antioch University’s (“AU” or the “University”) Code of Ethics provides key legal and ethical guidelines that every employee acting on behalf of AU affairs must be aware of and follow. This policy serves to identify ethics and compliance rules that apply to the institution, and make clear the institution’s expectation for individual conduct that will sustain these standards.

II. Purpose

A. Some of these standards are detailed in other policy documents where there is specific application to particular circumstances. This Code of Ethics (COE) summarizes all important ethical principles of general application. It does not replace or modify policy statements tailored to specific circumstances. That is, there may be other University policies and resources that provide more detail and guidance about certain laws or rules and how they are applied and enforced such as the Family Educational Rights and Privacy Act (FERPA) as found in the University’s FERPA Policy # 5.629.

B. As with other employment policies, the COE aims to inform and guide professional conduct. Employees are expected to be familiar with and abide by the COE policy. Violation of this policy may be grounds for disciplinary action that could lead to termination and, in some instances, result in civil and criminal liability.

The COE applies to every employee, officer or director of Antioch University and its operations worldwide, including students, faculty, staff and members of the Board of Governors. Employees must complete regular COE training and follow the standards set forth in the COE. Any employee who refuses to uphold the COE may be dismissed.

III. Antioch University Code of Ethics and the Law

A. Any employee who acts in good faith to seek advice, raise a concern, or report misconduct is following COE. AU will not tolerate direct or indirect retaliation of any sort against such individuals including adverse employment actions. Those who engage in retaliatory conduct will be subject to disciplinary action, which may include termination. See the Whistleblower Protection Policy #4.007 for more information.

B. Those who supervise others have the additional responsibilities of ensuring that those they supervise understand COE and related policies, monitoring compliance, and supporting those who report a suspected violation.

C. There may be regulations or laws that apply to a specific University activity or geographic location that are not covered by COE. Even if these laws or regulations are not specifically addressed in COE, they are deemed to be included and must be complied with as if they are. In other words, COE requires that all AU employees act in a lawful manner and comply with all applicable laws and regulations that impact their work for the University, which laws and regulations are incorporated herein by reference.

IV. Making an Inquiry or Reporting a Suspected Violation

A. The success of any ethics program rests on the participation and cooperation of all employees. AU depends on all employees to ensure that its dealings with students and the University community and society in general are trustworthy and ethical. In order to achieve this, it is incumbent upon all employees to take action whenever:

1. They have a question about the lawful or ethical course of action;
2. They believe that someone has violated or may violate COE or a related policy; or
3. They believe that they may have violated COE or a related policy, even inadvertently.

B. Employees are to report suspected or confirmed unethical or unlawful behavior. The COE is not intended as a forum for employees to provide general feedback on AU business decisions.

Supervisors or managers are often a good resource to first turn to in addressing ethics issues. Employees may also seek advice from the Office of Human Resources, or the Vice Chancellor of Finance / CFO. All inquiries will be treated with an appropriate level of confidentiality.

If preferred, an employee can call AU's Compliance Hotline (1-866-606-4026) or visit <https://antiochuniversity.alertline.com> 24 hours a day, seven days a week, to report a violation or to make an inquiry. The Compliance Hotline is staffed by a third party and interpreters are available.

If an employee calls the Compliance Hotline, a call specialist will listen to the report or inquiry and make a detailed summary of the call. The information will be forwarded to the appropriate individual(s) to look into the matter; this will always be someone other than the person to whom the complaint or report refers. Reports dealing with financial issues, including accounting, internal accounting controls or auditing matters, will normally be brought to the attention of the Audit Committee of AU's Board of Governors pursuant to the procedures established by the Audit Committee as required by the Sarbanes-Oxley Act of 2002. The confidentiality of callers to the Compliance Hotline will be maintained to the extent possible, while balancing the best interests of the employees involved, AU, and its obligations under the law should the person initiating the call choose not to self-disclose. Employees may submit their concerns anonymously or with attribution as they choose.

By these measures, the University Audit Committee has taken responsibility for ensuring that processes are in place for the receipt, retention and treatment of any complaints about accounting, internal controls and auditing issues under Section 301 of the Sarbanes Oxley Act. Channels are open for employees to communicate their knowledge of malfeasance or errors regarding these issues without fear of management retaliation.

V. Our Responsibilities to Each Other and the Policy

Recognizing that more detailed guidance is provided in related policies, AU makes the following commitments:

A. External Constituencies

AU employees shall treat all visitors to the University with civility and respect. Employees must also operate our facilities and conduct themselves, on and off campus, in a way that does not unjustly deprive our community neighbors of enjoying the benefits of their rights as property owners. We must not act in a manner that causes any diminution in the quality of life in our surrounding neighborhoods, or that brings discredit to the University, or to any University constituent group. Dealings with all levels of government must be direct, honest, and open.

B. Providing Equal Employment Opportunity and Maintaining Diversity

As a member of the University community, employees shall treat each other with civility and respect. AU will make employment decisions without regard to race, color, national origin, religion, sex, sexual orientation, gender identity, age, disability, veteran status, or any other protected classification as outlined in the Affirmative Action and Equal Opportunity Policy # 4.005. AU will make reasonable accommodations for qualified disabled employees and applicants, unless such accommodations would impose undue hardship on AU's operation as described in the Reasonable Accommodation Policy # 4.107. This policy applies to all aspects of employment, including recruitment, hiring, testing, compensation, assignment, training, promotion, discipline, termination, and other privileges, terms and conditions of employment. AU highly values the gathering and association of scholars and staff with diverse personal backgrounds, human experiences, and cultures in our learning community. Accordingly, we shall advance diversity and treat others with civility and respect in all that we do as members of this community and we shall consider intolerance, disrespect, and incivility to be inimical to our fundamental interests as an institution of higher education.

AU also values, as a compelling academic interest of the University, the promotion of ethnic and racial diversity in our academic programs and activities and in the composition of our student body, our faculty, and our staff. Providing an education with cross cultural experiences and insights will help our graduates to function to their fullest potential in a pluralistic society. To realize this academic interest, we must engage in positive efforts to promote racial and ethnic diversity in our classrooms, in our curricula, and in all other activities that are designed to further the educational experience of our students.

C. Intolerance of Favoritism

AU will endeavor to treat employees in a fair and impartial manner. AU managers (that is, all employees who directly or indirectly supervise or direct another employee on a full- or part-time basis) will not favor any employee in assignments, compensation or promotions or similar matters based on any personal friendship or financial or social relationship with the employee, or in violation of AU's Affirmative Action and Equal Employment Opportunity Policy. In addition, AU will not give preferential treatment to third parties or independent contractors based on personal or other relationships.

D. Freedom from Harassment

AU will create an environment that is free from unlawful harassment based on race, color, national origin, religion, sex, sexual orientation, gender identity, age, disability, veteran status, or any other protected classification. AU will not tolerate any conduct that constitutes or could lead or contribute to such harassment, toward or by our employees, volunteers, contractors, students, vendors, or the University community.

E. Non-Violent Work Environment

AU will strive to ensure a safe and secure work environment, free from violence in accordance with the Workplace Violence Policy 4.503. AU will not tolerate threats (whether implicit or explicit), intimidation, aggressive behavior or violence. AU will not allow weapons or explosives of any kind in our workplace.

F. Safe Workplace

AU will strive to maintain a safe workplace. Employees will stay current on safety issues and policies that affect their work as described in the Safety and Security Policy #4.501. Employees are expected to comply with all University health and safety directives and to comply with all federal, state and local health and safety laws and regulations. Employees are expected to advise AU promptly of any workplace injury or any dangerous situation so that it can be addressed promptly.

G. Addressing Substance Abuse

AU will maintain a productive workplace in which the abuse of alcohol and the use, possession or sale of illegal drugs is forbidden as described in the Drug-Free Workplace Policy # 4.505.

H. Employee Information

AU values and will protect the privacy and confidentiality of employee personnel and medical records and personally identifiable information, such as social security numbers. AU employees will not share or discuss such records or information outside AU, except as authorized by the employee involved, or as required by law, regulation, subpoena, or order issued by a court of competent jurisdiction, or as requested by a judicial, administrative or legislative body.

I. Student Information

AU will endeavor to maintain the confidentiality of student information and to use it appropriately. The University will endeavor to safeguard any confidential or personally identifiable information that our students share with us. AU employees will consult the Office of University Counsel with any questions regarding use of student information.

J. Confidential and Proprietary Information

AU employees will protect AU's confidential and proprietary information and will not communicate it to anyone who is not authorized to see it, including family members. This information could include, but is not limited to, student lists, confidential student

information, nonpublic financial information, and significant projects, including proposed acquisitions and divestitures. Employees will endeavor to maintain the confidentiality of AU's confidential and proprietary information both while working for AU and indefinitely after ceasing employment. Employees will not use AU's confidential and proprietary information for their own benefit or the benefit of any party other than the University, either during or after employment with the University.

K. Information Security

AU employees will take all measures requested by AU to secure the information in our custody whether in paper or electronic format. Employees will secure our computers, handheld devices, and other equipment issued by AU or used for University business with passwords or other means. Employees will not share our passwords with others. Employees will immediately report any potential breach of security or loss of data to the Office of University Counsel and Information Technology. Employees will not attempt to destroy, circumvent, compromise or subvert AU systems, security measures or audit measures. Employees will not access, limit access by others who have authority for access, copy, remove or destroy files, data or systems without authority to do so.

L. Fair Dealing

AU will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Our goal is to ensure candor and honesty in our business dealings, including those with any governmental body, any self-regulatory organization of which AU or any of its affiliates is a member, or the public.

M. Integrity in Marketing, Advertising and Promotions

AU will market, advertise and promote the University in a fair, truthful and ethical manner.

N. Appropriate Giving and Receiving of Gifts and Entertainment

AU employees will not solicit or accept, directly or indirectly, any cash or monetary equivalents, objects of value or preferential treatment from any person or enterprise that has, or is seeking, business with AU where doing so may influence, or appear to influence, our business judgment or create an obligation to a contractor, student or vendor. However, employees may accept gifts of nominal value offered in the normal course of business as long as they do not influence, or appear to influence, our business judgment. Employees will not offer excessive gifts or entertainment to others whose business AU may be seeking. Employees understand that special rules may apply to employees involved in seeking business with, or providing services to, government entities and should contact the Office of University Counsel for guidance in such circumstances.

O. Avoidance of Money Laundering, Illicit Financing and Dealing with Prohibited Parties

AU will endeavor to conduct University operations only with reputable members of the public who are involved in legitimate business activities. AU will take reasonable steps to ensure that AU does not accept payments that may have been generated by illicit financing, including activities by or for terrorist groups, or that may be an attempt to launder money that was generated by criminal activity. AU will not conduct University business with individuals, entities, companies or countries with whom such business is prohibited by applicable law.

P. Avoidance of Improper Payments and Corruption

AU will not engage in commercial bribery, including the offer or acceptance of any improper payments, gratuities or gifts to obtain or retain business or secure services anywhere in the world. AU will not offer or make improper payments to government officials, officials of public international organizations, political parties or political candidates. AU will not give or offer anything of value that would be beyond usual or customary practices or would violate laws on giving to foreign or United States government officials. AU will conduct University business in accordance with the objectives of the Foreign Corrupt Practices Act.

Q. Antioch University Opportunities

AU employees have a duty to AU to advance the University's interests when the opportunity to do so arises. When students, employees, service providers and others present ideas and opportunities to AU employees, we recognize that those opportunities belong to AU. Employees may not take such idea or opportunity for their own personal benefit. If they learn of any such idea or opportunity they will not participate in it outside of their position at AU without prior approval from the Office of University Counsel. Executive Team members must obtain the prior approval of the Audit Committee of AU.

R. Resolving Conflicts of Interest

AU employees have a right to manage their own personal affairs and investments. However, they owe AU their loyalty, and must avoid any interest, investment or association that interferes with their ability to represent the University's best interests as described in the Conflict of Interest Policy # 2.105. Employees will avoid situations that present or appear to present a conflict between their personal interests and AU's interests. Employees recognize that a conflict can arise when employees take action or have personal interests that may make it difficult to perform AU work objectively or effectively. Employees recognize that a conflict can also arise when they or a member of their immediate family receive personal benefits as a result of their position at the University. Employees will contact the Office of University Counsel with any questions regarding conflicts of interest and to disclose any relationship that appears to create a conflict of interest. Executive Team members must

disclose actual or potential conflicts of interest to the Audit Committee of AU's Board of Governors.

S. Use of Information Technology Resources and Other AU Assets

Safeguarding AU's assets is the responsibility of all AU employees. Employees will use AU's assets in an ethical, lawful and professional manner. Employees will not waste or destroy AU's assets. AU may provide employees with supplies, software, networks, and electronic equipment and systems (such as computers, handheld devices, cell phones, Internet access, telephone, voicemail, and e-mail) to help perform their duties. These assets are provided for AU business use as per the Permitted Uses of Technology Policy # 4.609. Employees understand that incidental personal use is permitted on a limited basis. Employees will not permit any third party to use AU-owned software, networks, electronic systems or equipment for non-AU purposes. Such Information Technology Resources contain information that is the property of AU Employees, therefore, do not have an expectation of personal privacy with respect to their use of those resources or the information and data residing on them. Employees understand that AU management may at any time monitor and review any AU equipment, network, or system, unless and to the extent that such review and monitoring is otherwise prohibited by applicable law. Employees will not install any software programs, devices, or appliances on AU computers or information technology systems unless approved by our Information Technology department.

T. Ownership and Protection of Intellectual Property

AU employees recognize that AU owns all rights, title and interest in intellectual property, including but not limited to trademarks; service marks; copyrights; patents; trade secrets; ideas; data; processes; business methods; computer software programs; and discoveries, conceived or developed by the employees during their term of employment, relating to actual or anticipated University business of, or research or development by AU. Employees will safeguard the intellectual property of AU. Employees will also respect and safeguard the intellectual property of others. Employees will not reproduce, destroy or alter copyrighted materials without permission of the copyright owner. Employees will use software according to the license terms.

U. Handling Insider Information

AU employees will not trade any stock on the basis of material nonpublic information, or transmit material nonpublic information to any other person, including family members, who may trade, or advise others to trade stock on the basis of such information. The definition of material nonpublic information is information that a reasonable investor would consider important in making a decision to buy or sell securities but which has not been publicly disclosed. When in doubt, consult with the Office of University Counsel to review specific situations.

V. Public Relations

AU employees are expected to be professional at all times and to protect the reputation of the University. This is particularly true when dealing with social media or traditional media, including questions from reporters and requests for interviews or photos. All media dealings should be in compliance with the University's communication policies. When appropriate, and for matters of significance, employees should refer media and public relations requests to the AU Marketing Office. Employees will take care not to disclose any confidential personnel or business information through public or casual conversations, with the media or others.

W. Political Activity

AU employees are able to support the political process through personal contributions or by volunteering personal time to the candidates or organizations of their individual choosing as described in the Political Activities Policy # 4.621. Employees will separate personal political activities from those of AU. Employees will not conduct these activities on AU time or with the use of any University resources such as telephones, computers, faxes, photocopiers or supplies. AU is prohibited from making contributions to candidates, officeholders and political parties at the federal level. Employees may make political contributions on a personal basis, in accordance with applicable law. Employees understand that laws governing contributions to state and local candidates vary from state to state, and are to be observed by all employees as applicable.

X. Responding to Legal or Regulatory Inquiries

AU employees will immediately consult with the Office of University Counsel if, as a representative of AU, they receive any claim, demand, summons, subpoena, inquiry or other similar legal or regulatory communication. Employees will assist with the University's response to legal and regulatory inquiries, as requested.

Y. Service as a Director or Trustee of Any Other Organization or Appointment to a Government Position

When in doubt regarding the ethics of serving as a director or trustee of any non-AU organization or to accept appointment to any government position, AU employees should consult with the Office of University Counsel.

Z. Use of Antioch University Letterhead or Branding

AU employees will not use the University letterhead or any other AU branded documents for personal matters as such materials are strictly for AU business use.

AA. Obligation to report Suspected Violations of the Code of Ethics

AU employees will report all suspected violations of COE, including their own, so that AU can fulfill its obligation to investigate and resolve all such reports. AU and employees will not retaliate against anyone who has made a good-faith inquiry or report of a suspected violation. If employees are aware of another employee reporting an allegation, they will hold that information in confidence, to the extent possible, and will not provide any information of the report or the substance of the allegation to any other employee or nonemployee, unless requested by AU or required by law or this COE to disclose that information.

BB. Accurate Books and Records and Financial Disclosures

AU employees are responsible for the integrity of the information, reports, forecasts and records under their control. Employees will maintain records in sufficient detail to accurately reflect all AU transactions. Employees will ensure that all transactions are made with management authority and in accordance with applicable laws and regulations. AU financial statements will be prepared in accordance with generally accepted accounting principles and fairly represent, in all material respects, the University's financial condition and results. Employees will abide by all relevant accounting controls, and maintain an adequate system of internal controls. Employees will not attempt to circumvent any such process or control. Employees will report any deficiencies in the design or operation of internal controls that could adversely affect AU's ability to forecast, record, process, summarize and/or report financial data. Employees will report any fraud that involves management or other staff who have a role in the University's financial reporting, forecasting, disclosures or internal controls. Employees will report any such concerns to the Office of University Counsel or directly to AU's Compliance Hotline. Based upon the magnitude of such deficiencies, AU is obligated to bring them to the attention of the Audit Committee of the Board of Governors as required by the Sarbanes-Oxley Act of 2002.

CC. Sound Information Management

AU employees recognize that they are each responsible for the information that they possess, collect, use and manage on behalf of AU. Employees create, receive and review information in many formats, such as word processing files, systems files, databases, e-mail and Web page content and on various media, such as paper, electronic, audio, hard drives and external memory. Employees will use common sense and professionalism in creating content and language in our written material, most particularly in e-mail. Employees will retain AU information, whatever the format or media, in accordance with AU's Information Management Policy. Employees will not destroy any information that is potentially relevant to a violation of law or any pending, threatened or foreseeable investigation or litigation.

DD. Environmental Awareness

AU employees will endeavor to conduct their work in an environmentally friendly manner.

VI. Enforcement

The Ethics Officer for AU is Antioch’s General Counsel, who is responsible for enforcement of this policy. Therefore, all questions of clarification or interpretation of this policy should be directed to the AU Office of General Counsel. Executive Team members may go directly to the AU Audit Committee, who will refer the question to AU’s Board of Governors, which has sole responsibility for clarification and interpretation of such matters.

VII. Annual Training and Certification

Each AU employee will, on a regular basis, complete COE training provided by the University and agree to the principles contained in AU’s COE Certification Form # 4.603:01.

Policy Cross References

Affirmative Action and Equal Opportunity	Policy # 4.005
Reasonable Accommodation	Policy # 4.107
Safety and Security	Policy # 4.501
Workplace Violence	Policy # 4.503
Drug-Free Workplace	Policy # 4.505
Permitted Uses of Technology	Policy # 4.609
Political Activities	Policy # 4.621

Form Cross Reference

Employee Code of Ethics Certification	Form # 4.603:01
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