



SUBJECT: STANDARDS OF CONDUCT	Effective Date: ¹ 2-15-21	Policy Number: 8.2
	Supersedes: New	Page Of 1 6
Responsible Authority: Vice President, Administrative Affairs Chief Compliance & Ethics Officer		

APPLICABILITY/ACCOUNTABILITY:

Florida Atlantic University's Standards of Conduct supplement the State of Florida Code of Ethics for Public Officers and Employees ("Florida Code of Ethics") to set forth ethical and professional principles that govern business dealings by and within the FAU Community.

DEFINITIONS:

FAU Community: Florida Atlantic University officers, faculty, and staff, including student employees in the context of their employment relationship with FAU, and, to the maximum extent permissible while engaging in business activities with or for the University, applicants for employment, volunteers, vendors, and independent contractors.

POLICY STATEMENT:

The University's mission to promote academic and personal development, discovery, and lifelong learning requires all members of the FAU community to share a commitment to excellence. The University is committed to excellence at all levels of the education, research, and creative experience. The success and reputation of the University in fulfilling its core mission depend on the integrity with which each community member—whether dean or faculty member, business manager or other staff—participates in our joint endeavor. Accordingly, each member of the FAU Community is expected to adhere to these Standards of Conduct in dealings pertaining to the University.

These Standards of Conduct are a key component of FAU's Compliance and Ethics Program. The standards set forth herein are designed to create a campus environment that is open, honest, and accountable. FAU strives to foster a culture that encourages and supports ethical decision-making and does not tolerate illegal or unethical behavior; addresses problems through collaboration, cooperation, and communication; reduces risks of non-compliance while

¹This policy may be supplemented from time to time by the Office of Compliance and Ethics as applicable University policies, regulations and other guiding sources are enacted and/or amended. Updated 12-8-21.

increasing the likelihood of early detection and correction; enhances decision-making at all levels by raising awareness of requirements/expectations; enhances employee engagement to report actual or perceived violations of law or policy; and protects FAU's reputation by reducing the likelihood that damaging or negative events will happen and minimizing the consequences of such events if they do. The principles set forth in these Standards of Conduct are reflected in many separate policies and regulations of the University, whose definitive statements appear elsewhere, such as the [Faculty Handbook](#) and the [University Personnel Policy](#). Nothing contained herein is intended to or shall be construed to conflict with applicable collective bargaining agreements or the Florida Code of Ethics.

1. Ethical conduct

Members of the FAU Community should conduct themselves ethically, honestly, and with integrity in all dealings, being fair and principled in their business interactions and acting in good faith with respect to the University and its students, research sponsors, alumni, and donors. When in doubt about the propriety of a proposed course of action, seek counsel from those colleagues, supervisors, or administrators who can assist in determining the right and appropriate course.

[Florida Code of Ethics for Public Officers and Employees](#)

[Regulation 5.011 University Ethics](#)

[Regulation 7.007 Process for Complaints of Waste, Fraud or Financial Mismanagement](#)

[Regulation 7.009 Fraud Prevention and Detection](#)

[Policy 7.5 Personnel](#)

[Faculty Handbook—Ethical Conduct of the University Community](#)

2. Respect for others

The FAU Community is diverse in a plurality of other ways. The actions of each community member establish and maintain the culture of tolerance and respect. The FAU Community should respect the rights and dignity of others regardless of their differences and must conscientiously abide by the principles of nondiscrimination adopted by the University. Harassment and discrimination have no place in our community. Exploitation of persons for any purposes will not be tolerated.

[Regulation 5.012 Employee Standards and Disciplinary Procedures](#)

[Regulation 7.008 Anti-Discrimination and Anti-Harassment](#)

[Policy 1.13 Disabilities and Accommodations](#)

[Policy 1.15 Prohibited Discrimination & Harassment](#)

[Policy 4.2.2 Campus Free Speech](#)

[Policy 7.7 Religious Accommodations for Employees](#)

[Policy 9.2 Social Media](#)

3. Civility and professionalism

The FAU Community shall maintain standards of civility and professionalism in the workplace. Members of the FAU Community are expected to conduct themselves in a positive, professional, collegial manner and to work harmoniously with other members of the FAU Community as well as external constituents. Discussion, dissent, and expression of opinion are to be expected and welcomed in an academic environment, but they must be conveyed in a respectful manner. All members of the FAU community including, but not limited to, administrators, faculty, and staff have a responsibility to contribute to the orderly and effective functioning of their units and the University as a whole, conduct themselves in a collegial manner in all interactions and avoid exploitation of FAU Community members for private advantage. Speech or actions, whether verbal, written or gestural, should not be disrespectful. Examples of unprofessional or

disrespectful activity include without limitation, the use of crude, abusive, or threatening language; workplace interference or sabotage; making negative or disparaging comments about the professional capabilities of others; making vicious, profane, or malicious statements, or statements known to be false or otherwise demonstrating a reckless disregard for the truth, concerning the University or any member of the FAU Community; engaging in violence or conduct that an objective person would deem threatening of the FAU Community; or repeated workplace behavior that a reasonable person would find hostile and threatening.

[Regulation 5.012 Employee Standards and Disciplinary Procedures](#)
[Faculty Handbook—Ethical Conduct of the University Community](#)

4. Conflicts of interest

The FAU Community must avoid improper conflicts of interest in conducting their work at the University. Conflicts may include doing business with University business partners or doing business directly with the University. Financial conflicts of interest must be disclosed, reviewed, and appropriately managed or eliminated. Faculty and staff should demonstrate sensitivity in identifying potential conflicts of interest, whether of a financial, personal, or professional nature, and must follow the reporting and other provisions of applicable state law and University regulations and policies.

[Regulation 5.011 University Ethics](#)
[Policy 1.10 Consensual Relations](#)
[Policy 7.1 Employment of Relatives](#)
[Policy 7.5 Personnel](#)
[Policy 8.3 Conflicts of Interest, Conflicts of Commitment, and Outside Activity](#)
[UFF CBA Article 19 Conflict of Interest/Outside Activity](#)
[Financial Conflicts of Interest in Research](#)

5. Compliance with legal authorities

The University is in a heavily regulated environment. Compliance with laws is important not only as a matter of legal compliance, but also as a matter of principle. Noncompliance can have severe adverse financial and other consequences, potentially affecting the reputation and operations of the entire University. The FAU Community must comply rigorously with federal, state, and local laws and regulations that apply to the performance of their responsibilities at the University. All have a duty to inform themselves, through University sources and independently, about relevant legal obligations and to keep current with changes in applicable law. When in doubt about the interpretation of applicable law, seek advice from the Office of the General Counsel.

6. Compliance with University regulations and policies

The University has established regulations and policies for managing its business and other operations. Some are required by law; some are prudential; and some are managerial, designed to ensure smooth and coordinated business operations. The FAU Community is expected to inform themselves about and comply with all applicable University regulations and policies, including without limitation those applicable departmental or divisional policies.

[Regulation 5.012 Employee Standards and Disciplinary Procedures](#)
[University Regulations](#)
[University Policies](#)

7. Compliance with contractual, grant, and other obligations

The University frequently undertakes contractual and other formal obligations to outside entities. These obligations are embodied, for example, in commercial contracts for the purchase of goods or services, software licenses, sponsored research, and memoranda of understanding or affiliation agreements with other organizations. The FAU Community is expected to adhere closely and act in good faith regarding all applicable obligations assumed by the University.

8. Stewardship of property and funds

As stewards of University property and funds with a responsibility to contributors to the University, members of the FAU Community should treat University property with care, as if it were their own property, and must expend funds prudently. They should avoid waste and improper use, and should not use University funds, property, or facilities for their personal benefit or for the benefit of a non-University organization without proper approval. Their acts should reflect the recognition of a special obligation to use University property responsibly and consistent with the tax-exempt status conferred on the University in light of its educational, research, and clinical mission.

[Regulation 7.007 Process for Complaints of Waste, Fraud or Financial Mismanagement](#)
[Policy 5.4 Bank Accounts & Management of Funds](#)
[Policy 12.2 Acceptable Use of Technology Resources](#)

9. Appropriate treatment of University information

In their various capacities, members of the FAU Community become privy to information of many different types. Such information may concern students, patients, employees, or research sponsors, for example, or it may be proprietary information of an enterprise licensing FAU intellectual property or otherwise subject to contractual or legal obligations of confidentiality. The FAU Community is expected to inform themselves about applicable obligations and to maintain the confidentiality of such information, safeguarding it and using it only as any applicable restrictions permit.

[Policy 1.18 HIPAA Compliance](#)
[Policy 8.1 General Privacy Policy](#)
[Policy 12.3 Responsible Use of Data Access](#)
[Policy 12.11 Information Security Roles and Responsibilities](#)

10. Internal controls

Internal controls provide the keystone of sound business practices, including without limitation, adequate segregation of duties, diligent application of preventive and detective control systems, and conscientious compliance with authorization, reporting, and other established processes. Internal controls are critical to ensuring efficient operations, responsible financial management, accurate financial reporting, careful protection of assets, and satisfactory compliance with applicable laws and regulations. All members of the FAU Community are expected to maintain and support internal controls structures at the University.

[Policy 5.6 Identity Theft Prevention Program](#)
[Policy 12.12 Clean Desk and Clear Screen](#)
[Elements of Effective Internal Controls for University Operations](#)

11. Gifts and gratuities

Relationships between members of the FAU Community and outside individuals and entities, including vendors, donors and potential business partners, must be free of any actual or perceived impropriety. Members of the FAU Community should not personally accept any gift, gratuity, or

other payment, in cash or in kind, from any vendor seeking to do business with FAU or currently doing business with FAU if such gift, gratuity or other payment is intended to influence their official actions or would otherwise create an appearance of impropriety. Some members of the FAU Community who are reporting members are also responsible to report certain gifts to the Florida Commission on Ethics. If questions arise about the materiality of a proposed gift or gratuity, the proposed recipient should seek advice from the Office of the General Counsel or the Chief Compliance & Ethics Officer.

[Overview of Laws Relating to "Things of Value," Gifts, and Expenditures](#)

[Office of Compliance & Ethics: Gifts](#)

[Regulation 5.011 University Ethics](#)

[Policy 9.1 University Gift Solicitation and Acceptance](#)

12. Reporting suspected material violations

The FAU Community is strongly encouraged to report suspected material violations of these Standards, of laws and regulations, or related University regulations and policies, both to the Inspector General, and to a supervisor, Dean, the Controller, or the Office of the General Counsel or the Chief Compliance & Ethics Officer, depending upon the nature of the violation. Retaliation against anyone who, in good faith, reports misconduct, or who participates in an investigation of misconduct, is strictly prohibited. An employee shall not be disciplined or otherwise penalized for reporting, in good faith, an allegation that these Standards have been violated.

[Anonymous Complaint Form](#)

[Ethics Hotline](#)

[Report a Concern Webpage](#)

[Regulation 7.007 Process for Complaints of Waste, Fraud or Financial Mismanagement](#)

[Regulation 7.008 Anti-Discrimination and Anti-Harassment](#)

[Regulation 7.009 Fraud Prevention and Detection](#)

[Policy 1.15 Prohibited Discrimination & Harassment](#)

[Policy 7.6 Reporting Child Abuse](#)

15. Consequences of violation

Violations of these Standards, of laws and regulations, or of related University policies and procedures may carry disciplinary consequences, up to and including dismissal. Supervisors, in consultation with Human Resources and/or the Office of Academic Affairs, as applicable and appropriate, are expected to take appropriate disciplinary action to address noncompliance.

[Regulation 5.012 Employee Standards and Disciplinary Procedures](#)

INITIATING AUTHORITY: Chief Compliance & Ethics Officer

POLICY APPROVAL
(For use by the Office of the President)

Policy Number: 8.2

Initiating Authority

Signature: _____ Date: _____
Name: Elizabeth Rubin

Policies and Procedures

Review Committee Chair

Signature: _____ Date: _____
Name: Elizabeth Rubin

President

Signature: _____ Date: _____
Name: Dr. John Kelly

Executed signature pages are available in the Office of Compliance