

UNIVERSITY OF CENTRAL FLORIDA

# **Employee Code of Conduct**

# A Word from our President



UCF has a culture of innovation and impact that reflects our strong commitment to excellence and integrity, and that culture begins with our people.

I have seen firsthand how our faculty and staff consistently rise to challenges with an inspiring sense of optimism. My hope is that UCF will support and enhance your professionalism by removing barriers to success and fostering an environment where you can make a difference.

This Code of Conduct is more than a set of rules—it is a reflection of our shared values. By upholding the laws, regulations, policies, procedures, and standards outlined within, we honor the trust placed in us and reflect UCF's enduring commitment to ethics and achievement.

Go Knights, Charge On!

Alexander Carturight

Alexander N. Cartwright, Ph.D. President

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# Honesty and Integrity: Our Guiding Principles





# THE PURPOSE OF THE UCF EMPLOYEE CODE OF CONDUCT

There are many laws, regulations, UCF policies, and ethical standards that we, as employees, are already expected to follow. The purpose of this Employee Code of Conduct is to provide one guiding document that highlights many of these requirements, and that can serve as a resource for employees when faced with questions or ethical dilemmas.

The UCF Employee Code of Conduct is part of UCF's comprehensive compliance and ethics program, supported by the UCF Board of Trustees, the president, and senior leadership. The vice president for compliance, ethics, and risk, who serves as the chief compliance and ethics officer, oversees our compliance and ethics program with support from the Compliance and Ethics Advisory Committee and compliance partners.

University Compliance and Ethics, under the direction of the vice president, is charged with implementing and sustaining the compliance and ethics program.

Please read this Employee Code of Conduct carefully. All employees are required to follow the UCF Employee Code of Conduct. Students are required to follow The Golden Rule.

This UCF Employee Code of Conduct does not cover every law, regulation, or policy that applies to all employees, and it does not replace department, program, or unit codes of conducts or standards.



# **UCF ETHICAL STANDARDS**

UCF is founded on integrity and expects members of the university community to demonstrate an unwavering commitment to the highest standards of excellence and ethical behavior. As individual members of the university community, our behavior is a reflection of who we are and affects not only our reputation, but also the reputation of the university. The following ethical principles and values guide members of the university community in all decisions and actions:

# **Honesty and Integrity**

We are fair and honest in all our activities and avoid actual or perceived conflicts of interests or commitments. We strive for transparency in our actions and do not allow plagiarism, lying, deliberate misrepresentation, theft, fraud, or cheating.

# Respect

We treat everyone with respect and dignity. We respect the ideas of others, even when they differ from our own. We do not permit unlawful harassment, mistreatment, belittling, harming, or taking advantage of others.

## **Responsibility and Accountability**

We honor our commitments and take responsibility for our actions. We comply with all applicable laws, regulations, and policies, ensuring that all our decisions are legal and ethically sound. We recognize our obligation to report unethical and illegal conduct.

### Stewardship

We use resources and information entrusted to UCF to support the university's vision, mission, and strategic goals. We do not use them for personal benefit, gain, or favor.



# DOING THE KNIGHT THING

Doing the Knight Thing means doing the right thing. Here at UCF, we promote a culture of integrity, trust, and respect, which is consistent with the UCF Creed. Since the UCF Creed's inception in 2001, the UCF community has consistently lived by its five tenets and those tenets remain just as relevant, if not more relevant, today.

# The UCF Creed

Integrity, scholarship, community, creativity, and excellence are the core values that guide our conduct, performance, and decisions.

# Integrity

I will practice and defend academic and personal honesty.

# Scholarship

I will cherish and honor learning as a fundamental purpose of my membership in the UCF community.

# Community

I will promote an open and supportive campus environment by respecting the rights and contributions of every individual.

# Creativity

I will use my talents to enrich the human experience.

### **Excellence**

I will strive toward the highest standards of performance in any endeavor I undertake.

Carefully read this Employee Code of Conduct, including the UCF Ethical Standards, and the UCF Creed. These resources will help you to identify the right course of action for most situations.

# If you are unsure of the right action to take, ask yourself:

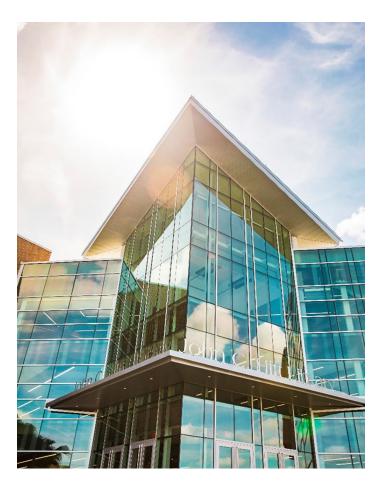
- Is it legal?
- Does it align with UCF standards and values?
- Would it violate UCF regulations or policies?
- Could it affect you financially or provide a personal benefit to you?

If you are still uncertain of the right thing to do in a given situation and need more assistance, consult with your supervisor, compliance partner of the related compliance area, University Compliance and Ethics, or submit an inquiry through the UCF IntegrityLine. For more guidance on making the right decision, refer to the Ethical Decision-Making section of this Code of Conduct.

# Supervisors and managers have the added responsibility of:

- Leading by example
- Setting clear expectations
- Supporting a respectful and professional work environment
- Promoting a culture where employees feel comfortable asking questions and raising concerns

If you are a supervisor, discuss expectations with your employees and provide them with the resources they need to follow this Employee Code of Conduct. Support an environment where employees feel empowered to ask questions and voice concerns. Always remember that employees raising concerns in good faith must never be retaliated against.





# ASKING QUESTIONS, RAISING CONCERNS

# Speak Up

Reflecting on our own actions is often the most effective way to maintain high standards of professionalism and ethical behavior. However, there may come a time when you will witness an employee acting contrary to this Employee Code of Conduct. Doing the right thing means acting with honesty and integrity and speaking up when you know of or suspect unethical behavior.

Employees, who in good faith believe that a violation of law, regulation, statute, UCF regulation, policy, procedure, guideline, or standard of conduct has occurred, or will occur, are expected, and encouraged to promptly make a report of such suspected misconduct. Employees do not need to have details of the law or policy to suspect misconduct. It is better to report the suspected misconduct than to remain silent. Management has a special duty to recognize and report misconduct without reasonable delay.

The university offers protection from retaliation for reporting concerns in good faith. Additionally, you may request, and you may qualify for whistleblower protection under the Florida Whistle-blower's Act.

Speak Up if you have ethical concerns about:

- Policy or regulation violations
- Conflicts of interest or commitment
- Financial matters
- Research misconduct
- Other questionable or unethical activity

# Where to Report - Options

There are several options for reporting concerns. You may choose to report:

- to your supervisor
- through central or administrative offices having specialized expertise relating to the concern
- to the UCF IntegrityLine
- or directly to University Compliance and Ethics

Concerns related to potential fraud should be reported directly to University Audit. Additionally, report your concern directly to University Audit if you are seeking whistleblower protection.

Unlawful discrimination or harassment, sexual harassment, sexual assault, sexual exploitation, relationship violence, or stalking involving a student must immediately be reported to the Office of Nondiscrimination & Accommodations Compliance (ONAC) or the Title IX Coordinator (unless you are a confidential employee, meaning you are entitled to have privileged communications under state law within the context in which you learned of the incident). Also, if you are a dean, director, department head, or supervisor, you are required to report to the ONAC all relevant details about an incident of unlawful discrimination. harassment or retaliation where the respondent (i.e., individual or group who has been accused of violating university policy, regulation, or procedure) is a university or direct support organization employee or volunteer. More information on these mandatory reporting requirements and contact information is available on the Let's Be Clear website and ONAC website, as well as in the Reporting Requirements Related to Nondiscrimination Policy.

The University Ombuds Office is a resource for individuals who prefer to have a confidential conversation and who are unsure of which reporting avenue to take. The Ombuds Office is an informal, independent, confidential, neutral office that offers assistance and impartial advice regarding concerns related to UCF. Communication to this office, however, does not constitute notice to UCF. Due to the confidential nature of the Ombuds Office, it will NOT disclose information to University Compliance and Ethics or any other central or investigative office, and therefore, individuals seeking advice from the Ombuds Office will ultimately need to report suspected misconduct using one of the methods described above. For more information about the office, please visit the UCF Ombuds Office website.

### Q&A

# What if I am not sure I witnessed misconduct, do I still report the incident?

You do not need to have details of a law or policy to suspect misconduct. If you witnessed an incident that is not consistent with our UCF Ethical Standards or the UCF Creed, you should report the incident. It is better to report the suspected misconduct than to remain silent.



# **UCF INTEGRITYLINE**

Employees reluctant to report suspected misconduct directly to their supervisors or through university administrative or central offices are encouraged to use the <u>UCF</u> IntegrityLine.

The UCF IntegrityLine is a secure reporting system administered by an independent third-party. The IntegrityLine is available 24 hours a day, 365 days a year, and is available online at the UCF IntegrityLine website, or by calling toll-free at 1-855-877-6049, or by text at 352-725-3684. Individuals who may be reluctant to report suspected misconduct through university administrative or central offices have a way to report with complete anonymity.

IntegrityLine reports are processed by the third-party and sent to University Compliance and Ethics and to University Audit to triage and address appropriately. All reports will be reviewed, investigated if appropriate, and responded to as discreetly and promptly as possible.

# Q&A

# Can I really remain anonymous when reporting through the UCF IntegrityLine?

Yes. The third-party does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC is available. If you call in your report, an interviewer will simply type your responses into the website for you. Callers are not traced or recorded.

After submitting your report, you will receive a unique code referred to as a "report key." You will use this report key along with the password of your choosing to check in using the website or telephone. This allows you the opportunity to review follow-up questions, submit more information about the incident, or receive a status update.

If a concern is reported by a named individual (the individual either intentionally self-identifies or provides information resulting in an inadvertent disclosure of their identity) via the IntegrityLine or other means, University Audit is responsible for determining if the individual qualifies for whistleblower status. This work and all required documentation to determine whistleblower status and related protections is performed in accordance with the Florida Whistle-blower's Act (Sections 112.3187-112.31895, Florida Statutes).





# **PROTECTION FROM RETALIATION**

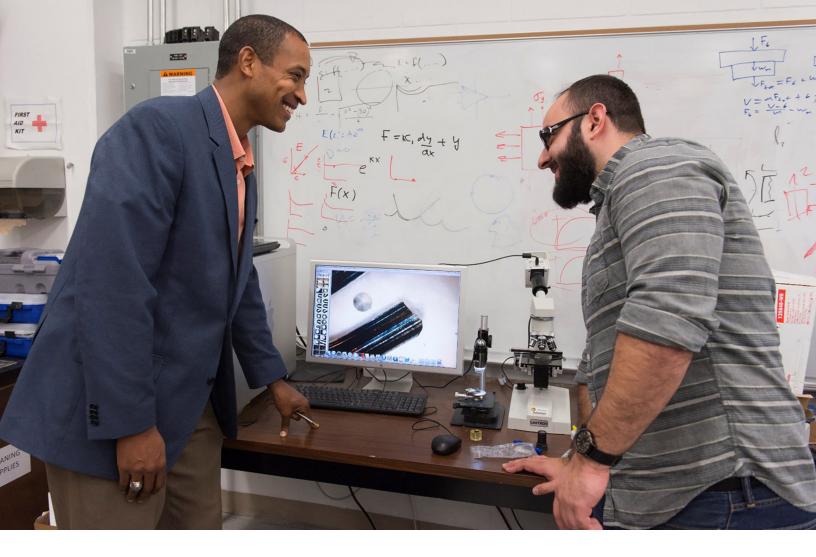
At UCF, we expect all employees to conduct university activities and business in an honest, ethical, and lawful manner. When we become aware of or have reason to suspect that an employee is not acting in this manner, we are expected to make a good faith report of suspected misconduct. Retaliation in response to reporting is prohibited. Knowingly making a false report or reporting with malice or reckless disregard for the truth is also prohibited.

Retaliation is an adverse or credible threat of an adverse action taken against an individual who submitted a good faith report of misconduct or participated in a misconduct investigation. Types of retaliation can include dismissal from employment, demotion, loss of salary or benefits, transfer or reassignment, denial of an earned promotion, and unwarranted written notice or a negative performance review.

To learn more, please review the <u>Reporting Misconduct and Protection from Retaliation Policy</u>. Protections from retaliation are also included in the <u>Nondiscrimination Policy</u> and the <u>Whistleblower Determination and Investigation Policy</u>.

If you suspect retaliation in response to reporting a concern or participating in an investigation, please immediately contact <u>University Compliance and Ethics</u> or file a report through the UCF IntegrityLine.

# Respect: Our Commitment to Each Other



# **DIGNITY AND RESPECT**

Here at UCF, we believe that every employee should feel valued for their contributions. We recognize that individuals bring a wide range of talents, perspectives, and experiences to our community. Treating one another with dignity and engaging in civil, professional communication strengthens our workplace and supports success for all. We are committed to cultivating a welcoming university climate that is supportive and free of unlawful discrimination.

### Q&A

A coworker sent a photograph with an offensive caption to some of us in the department via email. No one seemed bothered by it, but I found it offensive. Should I confront them or just let it go?

We have an obligation to maintain a supportive and welcoming environment for all our employees.

If you feel comfortable, you can have a direct conversation with your coworker about why you found the email offensive. If you feel uncomfortable speaking to your coworker directly, you can consult your department supervisor, your Human Resources Business Center Leader, the UCF IntegrityLine, or University Compliance and Ethics.

# PROMOTING CIVIL DISCOURSE

At UCF, we are committed to fostering a welcoming and respectful workplace where all employees can fully engage in their roles and responsibilities. As a public institution, we uphold the principles of free expression and open inquiry, and we expect all members of the UCF community to contribute to a professional environment free from hostility and unlawful discrimination.

By promoting mutual respect, civil discourse, and the free exchange of ideas, we strengthen collaboration, support a positive workplace culture, and reinforce our shared responsibility to uphold UCF's values and mission.

# EQUAL OPPORTUNITY & NONDISCRIMINATION

Our university is committed to providing access to education and employment free from unlawful discrimination or harassment. This includes providing reasonable accommodations for employees' and students' disabilities, religious beliefs and practices, and/or pregnancy or pregnancy-related conditions. More information is available on the Office of Nondiscrimination & Accommodations Compliance website.

# **Related Policies and Regulations:**

UCF 2-004 Nondiscrimination Policy

UCF 2-006 Digital Accessibility

UCF 2-012 Title IX Grievance Policy

UCF 2-014 Amorous Relationships Prohibition

UCF 2-015 Reporting Requirements Related to Nondiscrimination

UCF 2-016 Remedial Measures, Prevention, & Education Related to Nondiscrimination

ONAC Service and Emotional Support Animals Policy

UCF-3.0134 Complaints and Grievances Alleging Discrimination, Harassment or Retaliation

UCF-5.020 Religious Observances

The Golden Rule Student Handbook





# Responsibility and Accountability: Our Compliance Commitments

# COMPLIANCE AND ETHICS AT UCF

Compliance with laws, regulations, policies, procedures, and standards of conduct rests with each of us at UCF. By doing our part, we are preserving the distinguished reputation of our university, as well as the careers, professional reputations, and future of all our faculty, staff, and students.

University Compliance and Ethics, under the direction of the vice president for compliance, ethics, and risk, chief compliance and ethics officer, is charged with implementing and sustaining a comprehensive compliance and ethics program based on key elements of the United States Federal Sentencing Guidelines and the Florida Code of Ethics for Public Officers and Employees, consistent with Florida Board of Governors (BOG) regulation. Compliance partners are embedded within each operational unit and lead targeted compliance programs across the university. The members of the Compliance and Ethics Advisory Committee (CEAC) advises the vice president on the implementation of the comprehensive compliance and ethics program and the mitigation of compliance and ethical risks at UCF. In addition, the purpose of the committee is to ensure effective and consistent communication and that the elements of the compliance and ethics program are implemented at all levels of the institution.

# Working together, we form the university's comprehensive compliance and ethics program.

For a list of compliance partners, including their departments and respective compliance responsibilities, refer to the **Accountability Matrix.** To view the list of CEAC members, refer to the **CEAC webpage.** 

### A&Q

# Where can I find the policies and regulations that I am supposed to follow?

The online repository of our policies and procedures is available at policies.ucf.edu. Our regulations are located at regulations. ucf.edu. You should also consult your department's, program's, or unit's policies and procedures.

# How do I know when policies and regulations are added or updated?

You can subscribe to notifications on the policies and regulations websites.



# HEALTH, SAFETY, AND SECURITY IN THE WORKPLACE

# **Safe Working Environment**

It is our duty to maintain a safe workplace by:

- ✓ Knowing and adhering to the workplace health and safety laws, university regulations, and policies applicable to us
- ✓ Correcting unsafe practices and conditions that are within our control
- ✓ Respecting the university officials who enforce the rules
- ✓ Participating in required drills and safety training
- ✓ Reporting incidents, injuries, and unsafe practices or conditions without delay

# **Sustainability Initiatives**

From energy to curriculum, from transportation to urban farming, UCF is leading the charge to deepen sustainability on campus. Information on our sustainability initiatives and the role employees play in those efforts is available on the <u>UCF Sustainability Initiatives website</u>.

# Alcohol, Drugs, and Smoking

Being under the influence of illicit drugs or alcohol negatively affects our ability to perform our jobs and creates an unsafe environment for ourselves and others. We prohibit the possession, use, sale, and distribution of alcoholic beverages on university- owned or controlled property, or in the course of a university activity, except as permitted by law and authorized by the university. The unauthorized use, possession, sale, distribution, or attempt to obtain any narcotic or controlled substance is also prohibited on universityowned or controlled property or in the course of a university activity, except as permitted by law. The use of university- owned or controlled facilities to manufacture, process, or distribute any drug or controlled substance contrary to law is also prohibited.

Additionally, we prohibit smoking on all university- owned, operated, leased, and controlled properties to maintain a healthy and safe environment for our faculty, staff, students, and visitors.

# Weapons

At UCF, we prohibit the possession, use, or storage of weapons on property owned or controlled by the university, including in a university vehicle, on one's person, or in one's office or residence hall. Additionally, the possession, use, or storage of weapons at events sponsored by or hosted at UCF, without university approval, is also prohibited.



# **Related Policies and Regulation:**

UCF 2-701 Drug-Free Schools and Workplace Policy

UCF 3-115 Alcoholic Beverages on Campus

UCF 3-119 Weapons on University Property and at University Events

UCF 3-120 University Smoke-Free Policy

UCF 3-122 Campus Safety and Health Policy

UCF-4.035 Alcoholic Beverages on Campus

# **INTERNATIONAL CONSIDERATIONS**

# **Complying with Laws of Other Countries**

Through our international partnerships and study abroad programs, some of our actions and activities will be subject to the laws of other countries. In addition to following the Employee Code of Conduct, we are required to know and follow these laws. If you have questions, contact the Office of the General Counsel or UCF Global for guidance.

# **Anti-corruption and Bribery**

Each of us has an obligation to comply with the U.S. Foreign Corrupt Practices Act and all country-specific anti-bribery and anticorruption laws. These laws generally state that you may not give, promise, or offer anything of value, no matter how small, to anyone for the purpose of improperly influencing a decision, securing an advantage, avoiding a disadvantage, or obtaining or retaining business. If you engage in such behavior, you expose yourself and the university to civil and criminal liability and significant reputational harm; you also undermine the trust that our students, their parents/guardians, and the community have placed in us. If someone asks you to violate these laws, you must immediately notify the Office of the General Counsel or University Compliance and Ethics, or you can submit a report through the UCF IntegrityLine.

## **International Collaboration and Export Control**

We encourage and support open research and the free exchange of ideas, but we are also committed to complying with United States (U.S.) export control laws, regulations, sanctions and trade embargoes. These laws control the release of certain technologies and information outside of the U.S. and to foreign nationals within the U.S. Prior written approval from the U.S. Government, including an export control license, may be required before certain technology and information can be exchanged. These laws exist to protect the U.S. and its citizens for reasons of national security, foreign policy, and competitive trade.

In addition to the U.S. export control laws, the U.S. Government and the State of Florida have expressed concerns regarding inappropriate influence by foreign entities, foreign governments, and foreign individuals on U.S.

institutions and researchers. This is commonly referred to as foreign influence.

Key concerns related to inappropriate foreign influence include but are not limited to the failure of researchers to disclose support from outside activities or foreign organizations. unlawfully transferring non-public information or research materials, and entering into agreements with foreign entities that may impose obligations on researchers that are contrary to university policies and/or federal and state laws and regulations. The above concerns impact all types of scholarly activity including research, student engagement, and intellectual property protection. To help mitigate the risks associated with inappropriate foreign influence, you should make sure to disclose all outside activities in accordance with UCF regulation, policy, and federal sponsor disclosure requirements. In addition, be sure to comply with all UCF policies and procedures related to international travel, international agreements, and the hiring of personnel for research positions.

We are all required to comply with these requirements. If you are engaging in international collaborations, traveling internationally, shipping internationally, engaging in distance learning from outside of the U.S., or conducting research that is subject to dissemination restrictions, you are required to be familiar with applicable UCF policies. If you have questions related to export control or anything else outlined in this section, please contact the Office of International Collaboration and Export Control for guidance.

## **Related Policies:**

UCF 2-900 International Academic Agreements

UCF 2-901 UCF Policy for All Foreign Nationals

UCF 2-903 International Travel

UCF 4-209 Export Control Policy

### Q&A

# What activities are subject to export controls?

Research, distance learning, foreign travel, international monetary exchange, provisioning or providing international service activities, providing technical assistance, advice, guidance or knowhow related to export controlled technologies, international shipments, or exports and imports of certain goods and technologies.

# Research activities include:

Any type of proprietary information, technical data, trade secret, or non-public know-how, cookbooks, recipes, methods, etc., that may be subject to export controls. Modifying or enhancing publicly available technology and software creates a new item that may be subject to export controls to the extent that it is not intended to be made publicly available. The extent to which research is subject to export controls depends upon certain variables. Contact the Office of International Collaboration and Export Control for additional guidance.



# **RESEARCH COMPLIANCE**

Our Office of Research Compliance works to ensure that research is conducted with the highest standards of integrity and in accordance with regulatory guidelines set forth by our university and the federal government. By preserving the standards of research, we hope to encourage innovative thinking and foster honesty and freethinking in our students, graduates, faculty, and staff. To help us achieve these goals, we have developed specific guidelines to follow when conducting research. See the related policies below for more information.

# The Office of Research Compliance works to ensure compliant and ethical conduct in research and oversees the following:

- ✓ Research Conflict of Interest
- ✓ Responsible Conduct of Research
- ✓ Effort Reporting and Certification
- ✓ Facility Security
- ✓ Research Animal Welfare
- ✓ Human Subjects Protection
- ✓ Research Reporting Requirements
- ✓ Sponsored Award Requirements and Cost Principles

All UCF employees who oversee or provide administrative support during research must follow all relevant laws, regulations, and policies. If you have questions or concerns, you may contact the Office of Research Compliance for assistance.

# **Related Policies:**

UCF 4-202 Human Research Protections

UCF 4-211 Research Misconduct Policy

UCF 4-504 Reporting Outside Activities, Financial Interests, and Potential Conflicts of Interest or Conflicts of Commitment in Research



# INTELLECTUAL PROPERTY AND COPYRIGHTED MATERIAL

### **Intellectual Property**

Intellectual property can include any inventions, literary and artistic works, symbols, names. images, and designs used in commerce that are produced or used within the university. We must be diligent in protecting UCF's intellectual property through measures such as forming non-disclosure and non-compete agreements. limiting the sharing of information with the public, keeping records in secure areas, and following clear guidelines as to the ownership of property and categorization of information as confidential. Different types of intellectual property are protected by separate laws. For more information on the various types of intellectual property and their protection, visit the Intellectual Property website. You may also contact the Office of the General Counsel.

# **Copyrighted Material**

All employees must be aware of and abide by all applicable copyright laws, which includes protections for works of literature, music, drama, film, sculpture, visual art, architecture, and other creative media. Before using any materials, we must check to ensure that they are not protected under copyright law, and if they are, we must obtain the owner's permission prior to such use. Employees may contact the Office of the General Counsel or the UCF Library Reference Department with any questions on copyrighted materials.

# Related Policy, Regulations and Resources:

UCF 2-103 Use of Copyrighted Material

UCF-2.029 Patents, Trademarks and Trade Secrets

UCF-2.033 Copyrights and Works

UCF Higher Education Opportunity Act Compliance Program for Peer-to-Peer File Sharing and Copyrighted Material

# **RECORDS MANAGEMENT**

# **Public Records**

We must be aware of and comply with Florida's public records law and Florida's retention schedules for public records. Most documents, including email messages and text messages, created or received by employees in connection with official business are public records, even if done so on a personal device. Unless a public record is exempt by statute, it must be produced to any person upon request with any exempt information removed. Before responding to any public records request, refer to university policy. For specific questions regarding public records laws, contact the Office of the General Counsel.

# **Preserving Information**

We preserve the institutional memory of our university by maintaining a complete archive of its history and accomplishments in the Special Collections and University Archives. Employees create and maintain university public records in the course of their duties. It is the responsibility of all employees who create and maintain university public records, in cooperation with the Special Collections and University Archives unit, to ensure that our university public records that document the history and activities of the university community are transferred to the Special Collections and University Archives for preservation. More information on this state requirement is available in the Florida General Records Schedule GS5.

Materials of historical interest include but are not limited to:

- ✓ administrative files
- ✓ financial documents
- ✓ reports, statistics
- ✓ strategic plans
- ✓ self-studies
- ✓ mission statements
- ✓ brochures, newsletters
- ✓ publications
- ✓ photographs
- ✓ multimedia materials

### Q&A

# Does a public records request have to be in writing?

No, it may be made in writing or orally. The requester also does not have to provide a legitimate need for the record. Be sure to read the policy on complying with public records requests.

## **Related Policies:**

UCF 2-003 Records Management

UCF 2-100 Florida Public Records Act: Scope and Compliance

UCF 4-001 Retention Requirements for Electronic Mail

UCF 4-005 Special Collections & University Archives



# INFORMATION PRIVACY AND SECURITY

# **Data and Information Privacy**

As an institution of higher education, we encourage, support, protect, and embrace freedom of expression to pursue scholarly inquiry and to share information with the global academic community. At the same time, we are expected to be familiar with and comply with university policies and regulations, and with federal and state requirements governing privacy protections, such as:

- ✓ Family Educational Rights and Privacy Act (FERPA)
- ✓ Health Insurance Portability and Accountability Act (HIPAA)
- ✓ Health Information Technology for Economic and Clinical Health Act (HITECH)
- ✓ Defense Federal Acquisition Regulation Supplement (DFARS) and Federal Acquisition Regulation (FAR) requirements on Controlled Unclassified Information (CUI)
- ✓ European Union (EU) General Data Protection Regulation (GDPR)
- ✓ National Institute of Standards and Technologies (NIST)
- ✓ Other relevant regulations or contractual obligations, such as the Payment Card Industry Data Security Standard (PCI DSS)



FERPA addresses the privacy of student education records. HIPAA is a comprehensive law and regulation that addresses the use and disclosure of individuals' protected health information by health care providers, health plans, and their contractors, and provides

individuals rights to understand and control use of their health information. PCI DSS stipulates information security controls on technology and business processes that manage and store credit card data.

Additionally, the university is required to comply with various state and international laws that require us to promptly respond to an individual's request for information regarding the personal data we hold about them. It is important to refer any of these types of requests immediately to Privacy Compliance at <a href="mailto:privacy@ucf.edu">privacy@ucf.edu</a> due to the limited timeframe in which the university is required to respond to these requests.

We all must protect the confidentiality, integrity, and availability of information generated, accessed, modified, transmitted, stored, or used by the university, regardless of the medium on which the information resides.

# Q&A

# In my position at UCF, I handle student information quite often. Where can I find a quick guide or tip sheet to help me stay in compliance with FERPA?

Resources on FERPA are available on the <u>Registrar's Office website</u>, including a page on <u>FERPA</u> and the following reference sheets:

FERPA Reference Sheet for UCF Staff
FERPA Reference Sheet for UCF Faculty

# Where do I go if I have general questions about privacy?

If you have general privacy questions or need assistance appropriately securing, transferring, processing, or storing university restricted data, including protected health information, personal or other confidential information, please contact Privacy Compliance at <a href="mailto:privacy@ucf.edu">privacy@ucf.edu</a>.

### **Data and Information Security**

Individuals working for or on behalf of our university who create, view, or manage university data are responsible for implementing appropriate managerial, operational, physical, and technical controls for access to and use, transmission, storage, and disposal of university data in compliance with our policies. The UCF Information Security Office must be notified immediately if data classified as highly restricted or restricted is suspected of being compromised. In the event of a suspected information security incident, do not attempt to take action on your own, but preserve information as much as possible and contact the University's Security Incident Response Team (SIRT) at sirt@ucf.edu.

As we continue to become increasingly reliant on technology, it is important that we take steps to protect information that we use, store, and send digitally. We follow security requirements and best practice guidelines specific to the proper and ethical use of technology to ensure the privacy and security of protected information. These requirements and best practice guidelines were created by federal, state, and UCF policymakers and continue to grow or develop as cybersecurity threats evolve and demands on technology change.

To protect cybersecurity and privacy, report all suspected security and privacy incidents, which include, but are not limited to:

- ✓ Unauthorized attempts (either failed or successful) to gain access to a system or data
- ✓ Unwanted disruption or denial of service
- ✓ Unauthorized use of a system for processing or storing data
- ✓ Inappropriate usage under university policy
- ✓ Theft or loss of university computing equipment

Follow these requirements when handling institutional data or using the university computing equipment and services:

✓ Do not share your university password or use your university password on non-UCF websites

- ✓ Do not store university data on a personally owned storage device or cloud storage location, such as iCloud and/or Google Drive
- ✓ Do not send Highly Restricted data via email without file or data encryption
- ✓ Use encryption when storing Highly Restricted data – only use university provided secure locations/servers for this purpose
- ✓ Do not open email attachments or click on links in an email without properly vetting the sender and the link - Carefully examine the sender and verify with the sender before opening attachments; Examine the link carefully (hover over with mouse pointer) to see where it is going to direct you and copy and paste the link into your browser
- ✓ Before entering personal information, such as username and password, on a website, always make sure the website address is correct and legitimate and is secured using "https"
- ✓ Do not collect credit card or bank account information via email or store them insecurely Proper processing of credit card and bank account numbers should be through secure university websites

To report an information security incident, such as unauthorized access to a university system or data, unauthorized usage of someone's account or the unauthorized distribution of Highly Restricted or Restricted data, please contact the Information Security Office using one of the following two ways:

- ➤ Via email to <u>sirt@ucf.edu</u>
- ➤ Call the UCF IT Support Center at 407-823-5117

### Q&A

# Where can I find resources on information security and potential threats such as phishing?

Visit UCF InfoSec for general information on security standards, procedures, and best practices.

# Who do I contact to report an information security incident?

Contact the university's Security Incident Response Team (SIRT) at sirt@ucf.edu.

### **Disclosure of Sensitive Information**

We have a duty to protect all sensitive information acquired during the course of our employment or service. Sensitive information includes, but is not limited to, the following categories of information, regardless of the format or medium in which the information is made, kept, or received (i.e., paper, electronic, video, verbal): any personally-identifiable information, financial information (including social security and credit card numbers), or health information: certain contracts: research information: alumni and donor information: personnel information other than an individual's own personnel information: university financial information; computer passwords; university proprietary information; and any other information for which access, use, or disclosure is governed by our university's regulations, policies, or procedures. University policy defines in detail the categories of information considered sensitive, and its level of sensitivity. and provides requirements on how it should be protected and handled in the event of a data breach.

# **Related Policies and Regulation:**

UCF 2-105 Identity Theft Prevention

UCF 4-002 Use of Information Technologies and Resources

UCF 4-007 Security of Mobile Computing, Data Storage, and Communication Devices

UCF 4-008 Data Classification and Protection

UCF 4-012 Collection and Use of Social Security Numbers

UCF 4-014 Procurement and Use of Cloud Computing and Data Storage Services

UCF 4-015 Information Security Incident Response

UCF 4-016 Email Provisioning, Deprovisioning, and Use Policy

UCF-3.045 Sensitive Information Disclosure

# **EXTERNAL COMMUNICATIONS**

### **Media Relations**

UCF has designated UCF Communications & Marketing as the division responsible for disseminating accurate, appropriate, and consistent messages of university-wide impact to the media, including university-owned media and social media. The division also assists university departments, staff, and faculty with how to best share positive news; navigate stories that may impact institutional reputation; and handle interactions with the media. Please contact UCF Communications for more information regarding public and media releases.

# **Legal Requests**

It is our policy, at UCF, to respond to legal and regulatory requests without undue delay. If you receive a subpoena that is university related, contact the Office of the General Counsel. Additionally, the Office of the General Counsel must be informed of any and all criminal matters where the university or any of its departments or units is the victim of a crime. The Office of the General Counsel will serve as the university's representative in dealing with prosecuting authorities and is the only office that can communicate whether or not we will press charges against an individual or entity who is alleged to have committed a crime against the university or any of its departments or units.

# **Regulatory Requests**

For any non-routine government or regulatory requests that you receive or if you believe that a government official is asking you to participate in an unauthorized review, contact the <u>Office of the General Counsel</u> or <u>University Compliance</u> and Ethics for guidance.



## **Our Brand**

At UCF, we speak with one voice. By speaking with one voice, we amplify our message and communicate clearly and consistently across all channels. It is our job to communicate our brand with unity, clarity, and consistency to ensure that people associate our university with credibility, quality, and excellence. By using our collective voice with integrity, we strengthen and share the UCF story. Employees should be aware of and follow the UCF Brand Guidelines.

### **Social Media**

When using social media, we as employees must always be professional and respectful. What we post not only reflects on us as individuals, but also reflects on the university as a whole. We must not post confidential or protected information, and we are expected to be aware of and follow university standards governing appropriate uses of social media. More guidelines about social media may be found at the UCF Brand Guidelines Social Media website.

# **Related Policies:**

UCF 2-104 Retention of External Legal Counsel

UCF 2-106 Communication with Prosecuting Authority

UCF 2-207 Licensing and Use of Universityowned Copyrighted Materials and Trademarks

UCF 6-002 Public Information and Media Relations



# Stewardship: Our Duty as Public Employees

# **FISCAL RESPONSIBILITIES**

Employees directly involved in the fiscal transactions of our university are required to comply with UCF's written policies prescribing a system of accounting, internal controls, and operational procedures for all financial transactions. The university controller's office is the only office authorized to establish bank accounts or financial relationships in our university's name and is the designated custodian of all university funds. UCF Financial Affairs is responsible for ensuring that any authorized department personnel have been properly trained in the receipt and handling of funding collected by the university. Departmental management is responsible for implementing proper collection practices and internal controls.

# When making a fiscal decision, you must ask yourself:

- ✓ Does this transaction comply with the law, BOG regulations, and university policies and regulations?
- ✓ Is this decision in the best interest of the university?
- ✓ Would I be comfortable explaining my decision to my family or seeing it on the front page of the newspaper?
- ✓ Does this transaction influence any future business decisions I will make?
- ✓ Could this transaction appear to be a conflict of interest to anyone such as the press or media?
- ✓ Have I received prior approval to spend, accept, or manage these funds?
- ✓ Have I been trained in proper collection and expenditure practices and internal controls?

# **Authorized Employees**

Only those employees with a valid delegation of contract signature authority from the president or other university official have the authority to execute contracts and grants with external entities on behalf of the university. Individuals who enter into contracts without signature authority may subject their departments or units to fines and themselves to disciplinary action up to and including termination. Such individuals may also be personally liable under the contract or grant.

# **University Resources**

University resources are provided to carry out our university responsibilities. We are responsible for being good stewards of these resources, using them ethically and responsibly, consistent with university regulations, policies, federal, and state law. University resources include any facilities (meeting rooms, banquet halls, etc.), equipment, vehicles, technology or software, network and electronic systems, records, cash and cash equivalents (expense cards, checks, postage), supplies, or any resource available to you in your position. Time is also a resource and therefore, during work hours you are expected to devote your attention to your UCF responsibilities.

# **Related Policies and Regulation:**

UCF 2-008 Internal Control Policy

UCF 2-107 Contract Signature Authority

UCF 2-800 Fraud Prevention and Detection

UCF 3-200 Receipt and Deposit of Funds by Departments; Types of Funds Accepted

UCF 3-207 Departmental Authorization Lists

UCF 3-210 Expenditure of University Funds

UCF 3-212 Allocation and Use of Education and General Carry Forward Funds

UCF 4-002 Use of Information Technologies and Resources

UCF-7.130 Administration and Finance; Procurement Services

# FLORIDA CODE OF ETHICS FOR PUBLIC EMPLOYEES

As employees of a public institution we are each subject to the Florida Statutes Chapter 112, part III Code of Ethics for Public Officers and Employees, also referred to as the state ethics laws. These laws are intended to ensure that we conduct ourselves independently and impartially, and do not use our public position for private gain. We are each expected to be familiar with the requirements in the state ethics laws and to refrain from engaging in any activity that creates a conflict of interest or a bias in decision-making, or that gives the appearance of a conflict or bias. The requirements apply to all of us, and include the following prohibited actions or conduct:

# **Solicitation and Acceptance of Gifts**

Employees may not solicit or accept anything of value, such as a gift, loan, reward, promise of future employment, favor, or service that is based on an understanding that their vote, official action, or judgment will be influenced by such gift.

# **Unauthorized Compensation**

Employees, their spouses, and minor children may not accept any compensation, payment, or thing of value when they know, or should know, that it is given to influence a vote or other official action.

### **Misuse of Public Position**

Employees may not use or attempt to use their official position or any property or resource that is within their trust to obtain a special privilege, benefit, or exemption for themselves or others.

### **Disclosure or Use of Information**

Employees (including former employees) may not disclose or use information not available to the public and obtained by the reason of their position for their personal benefit.

# **Doing Business with One's Agency**

Employees, acting in their official capacity, are prohibited from directly or indirectly purchasing, renting, or leasing any realty, goods, or services for UCF from a business entity in which the employees or their spouses or children serve as an officer, partner, director,

or proprietor, or owns more than a 5% interest. Employees, acting in their private capacity, are also prohibited from renting, leasing, or selling any realty, goods, or services to UCF.

# **Conflicting Employment or Contractual Relationship**

Employees may not work for or contract with a business entity or agency regulated by or doing business with UCF. Our employees also may not work for or have a contractual arrangement which will create a continuing or frequently recurring conflict between their private interests and the performance of their public duties or that will impede the full and faithful discharge of their public duties.

# **Contractual Services: Prohibited Employment**

Employees who participate in the decisionmaking process involving a purchase request, who influence the content of any specification or procurement standard, or who render advice, investigation, or auditing regarding a university contract for services, may not be employed by a person holding such a contract with UCF.

### Q&A

# How do I know if a company is doing business with or plans to do business with UCF?

You are required to confirm with the company before engaging in any employment or contractual arrangement.

# If I own a business, can I sell products or provide services to UCF?

No, not unless you meet one of the state exemptions and receive approval.

# **AVOIDING CONFLICTS**

# **Conflicts of Interest and Commitment**

Our professional allegiance must always be to the university. When our loyalty is tempted, or when our personal interests – family, friendships, financial, or social factors – could compromise our judgment, decisions, or actions in the workplace, then a conflict can arise. Simply put, conflicts of interest are a clash between interests and requirements. A conflict of commitment occurs when we spend so much time on our outside activities that our work at UCF suffers. Some situations where a conflict can occur:

- ✓ You or your family member either work for a company, or have an ownership interest in a company, that is doing business with UCF
- ✓ You use your position to seek employment for your relative
- ✓ You accept gifts from companies either doing business with UCF or that want to do business with UCF
- ✓ You use university time or resources to support your outside activities
- ✓ You work full-time for a company while trying to maintain your full-time employment at UCF
- ✓ You use university students to support your outside activities

# **Accepting Gifts**

Gifts offered directly to an employee engaged in a working relationship in their official capacity with a vendor are frequently offered to create or maintain a favorable opinion of the vendor to retain or gain UCF's business. As employees of a public institution, the state ethics laws prohibit us from accepting these types of gifts. For that reason, even when it seems to benefit the university, gifts including meals and complimentary registration offered by vendors to employees where there is a working relationship, regardless of the value, are not permitted and may not be accepted.

Employees are encouraged to contact University Compliance and Ethics when there is any doubt about whether a gift is allowable. Gifts of nominal value such as small items at vendor tables including pens or candy offered to everyone, and not targeted to our employees, are generally permitted.

### Q&A

# What if I leave UCF to work for a company after participating in the process to award the company a contract?

Resigning employees working for a company (without UCF's written permission) during the life of the contract subjects the company to termination of the contract at our sole discretion.

# **Related Policy and Regulation:**

UCF 2-009 Gifts and Honoraria

UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment

# **Solicitation on Campus**

The distribution or display of printed material, merchandise, or products designed to publicize, advertise, or encourage the purchase, use, or rental of property, product, merchandise, publication, or service is a solicitation. Employees must not engage in any activity considered solicitation while on campus without first receiving proper approvals from <a href="UCF">UCF</a>
<a href="Business Services">Business Services</a>.</a>

# Q&A

# May I use my university email to invite friends and co-workers to purchase items from my jewelry party or to participate in a fantasy football game?

No. This is considered solicitation and is not permitted. Remember, your UCF email is for university business only.

# **Political Activities**

Supporting candidates or issues of our choice and participating in the democratic process is a privilege of citizenship, but we all must be careful to not in any way associate these activities as formal representations or endorsements by the university. Employees may run for public office or participate in appointed public service, but it is incumbent on the employee to demonstrate to their supervisor that no conflict of interest or conflict of commitment exists. If the elected or appointed public position adversely affects the duties and responsibilities of your university position, appropriate adjustment in compensation, length of contract, or prescribed duties shall be agreed to in writing and approved by the president or the president's designee.

# **Related Policy and Regulation:**

UCF 2-600 Political and Campaign Activities

UCF-4.010 Solicitation on Campus

# Relationships in the Workplace

While consensual amorous relationships may seem harmless, they can create a conflict in the workplace by adversely affecting decisions. distorting judgment, and undermining workplace morale for all employees. This is particularly true where the relationship is one of unequal power (i.e., where one of the individuals in the relationship has a professional responsibility toward the other, such as in the context of instruction, advisement, or supervision). For this reason, employees in a supervisory position are prohibited from pursuing or engaging in an amorous relationship with anyone whom they supervise. Romantic partners, including spouses, will be separated for purposes of evaluation and direct supervision.

Similarly, employees are prohibited from pursuing or engaging in an amorous relationship with any undergraduate student.

With respect to graduate students, employees are prohibited from pursuing or engaging in an amorous relationship with a graduate student under that individual's authority. An "amorous relationship" is defined as an intimate, sexual, or any other type of amorous encounter or relationship, whether casual or serious, short-term or long-term. For more information related to amorous relationship prohibitions, please review the university's Amorous Relationships Prohibition Policy.

No relatives shall be employed by, transferred to, or promoted within a single unit, department, college, or division where a direct or indirect supervisory relationship exists, a conflict of interest exists, or any situation which places relatives in a foreseeable conflict between the interests of the university and the interests of the relatives. UCF does not permit the appointment, transfer, or promotion of relatives within the same chain of command.

# Q&A

# Why is the university getting involved in amorous relationships?

Employees working with students must be aware that amorous relationships with students are likely to lead to difficulties and have the potential to place employees at great personal and professional risk. The power difference between employees as compared to students means that any amorous relationship between an employee and a student is potentially exploitative or could at any time be perceived as exploitative. Employees engaged in such relationships also need to be aware that they may unexpectedly be placed in a position of responsibility for the student's instruction or evaluation.

Amorous relationships between supervisors and their subordinate employees often adversely affect decisions, distort judgment, and undermine workplace morale for all employees, including those not directly engaged in the relationship. This can lead to claims of favoritism, biased decision-making, a hostile work environment, and collusion.

As we look to our peer and aspirant institutions and major employers across the nation, we see that we are not alone in our institutional decision to prohibit such relationships.

### **Related Policies:**

UCF 2-004 Nondiscrimination Policy

UCF 2-014 Amorous Relationships Prohibition

UCF 3-008 Employment of Relatives



# OUTSIDE ACTIVITY AND CONFLICT OF INTEREST AND COMMITMENT DISCLOSURE

Having a conflict is not always unlawful or prohibited. Some conflicts can be mitigated or managed, which is why disclosing all activities is important.

The process of disclosing outside activities for review and approval protects us from unknowingly violating a state or federal law and protects our credibility and reputations by providing a transparent system of disclosure, approval, and documentation of outside activities that might otherwise raise concerns of a conflict of interest or commitment.

At the beginning of the academic year a disclosure is required of all faculty, executive staff, post-doctoral employees, and select individuals in university positions of trust, or other employee types engaged in the design, conduct, and reporting of research at UCF.

Employees who do not meet one of the employee types subject to the annual disclosure are required to submit a report prior to the initiation of an outside activity or employment. Information on the disclosure requirements and the forms used for disclosure are located on the websites for <u>University Compliance and Ethics</u> and the Office of Research Compliance.

### O&A

# How do I know which activities I am required to list in my outside activity disclosure?

Activities that meet the definition of an outside activity are required to be disclosed in advance of starting the activity. This includes any compensated or uncompensated secondary employment or activity, private practice, private consulting, teaching, research, or other activity that is not part of your assigned duties at the university.

# **Related Policy and Regulation:**

UCF 4-504 Reporting Outside Activities, Financial Interests, and Potential Conflicts of Interest or Conflicts of Commitment in Research

UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment





# Additional Guidance & Resources



# ETHICAL DECISION-MAKING

Following our UCF Ethical Standards, ask yourself — will the decision I make demonstrate:

# 1. Honesty and Integrity

Am I being fair and honest, avoiding actual or perceived conflicts of interests or commitments? Am I being transparent?

# 2. Respect

Am I being respectful to the ideas of others and ensuring that I am not taking advantage of others?

# 3. Responsibility and Accountability

Am I certain that this action is legal and ethically sound?

# 4. Stewardship

Am I using the university's resources to carry out my responsibilities to the university, or will this use provide me some personal benefit?

For more guidance, refer to the Framework for Ethical Decision Making.

If you are still uncertain of the right thing to do in a given situation and need more assistance, consult with your supervisor, compliance partner of the related compliance area. University Compliance and Ethics, or submit an inquiry through the UCF IntegrityLine.

### Does it align with UCF standards, values, regulations, policies, procedures and our Code? Yes Would I feel comfortable Stop. Don't do it. Seek help first. The action may explaining my actions to a Reach out to have serious colleague? To my someone for supervisor? To my family? consequences.

Could I defend my

actions if they appeared in the morning news?

Yes

The decision to proceed appears appropriate.

sure

guidance.

If unsure, ask yourself:

Is it legal?

# **UNIVERSITY CONTACTS**

You are encouraged to contact your immediate supervisor or department management for more information on this UCF Employee Code of Conduct. You may also contact the compliance partner responsible for the related area of compliance.

For a list of compliance offices and partners please visit the <u>CEAC webpage</u>. University Compliance and Ethics is also available by email at complianceandethics@ucf.edu.

# **UCF INTEGRITYLINE**

If you are uncomfortable using other resources. are unsure who to contact, or want to raise a question or concern anonymously, use the UCF IntegrityLine. The IntegrityLine is available 24 hours a day, 365 days a year on the UCF IntegrityLine website, or by calling 1-855-877-6049 toll-free.

Please note that the UCF IntegrityLine is not a 911 or emergency service, and you may not receive an immediate response. If you require emergency assistance, please contact your local authorities or call 911.

### FAQS

# What is the purpose of the UCF Employee Code of Conduct?

The purpose of the UCF Employee Code of Conduct is to provide employees with a resource that summarizes many of our university policies and regulations, as well as state and federal regulations that apply to the university, and the ethical standards which employees are expected to follow. If you have questions, you can talk with your immediate supervisor, department manager, the Human Resources Business Center Leader, or University Compliance and Ethics.

# To whom does the Code of Conduct apply?

The UCF Employee Code of Conduct applies to all employees including senior leadership, faculty, and staff. The Student Code of Conduct (*The Golden Rule*) outlines expectations for students.

# What if some of my personal beliefs are in conflict with some of UCF's policies?

We do not seek to change the personal beliefs of our employees. However, we do define expectations of how employees should behave in the workplace through the UCF Employee Code of Conduct and university policies. These, in turn, are based on our ethical standards.

# What happens if I accidentally violate our Code of Conduct, another policy, or a law/regulation?

It really depends; every situation is different. Employee misconduct, whether intentional or accidental, will be reviewed by management to ensure proper resolution and/or disciplinary measures are carried out in accordance with UCF policy.

# Will I be protected from disciplinary measures if I document and prove that a higher-ranking employee asked me to circumvent or break a law, regulation, or policy?

No, you must never engage in behavior that knowingly violates any law, regulation, or policy. If you feel you are being pressured to do something unethical, do not follow through and report your concern immediately to University Compliance and Ethics or through the UCF IntegrityLine. Refer to Asking Questions, Raising Concerns for more reporting options.

# To whom should I report a violation or suspected violation of the UCF Employee Code of Conduct?

If you suspect that any member or affiliated member of our UCF community has violated any policy, regulation, or portion of the UCF Employee Code of Conduct, you have a responsibility to report it. You may contact the immediate supervisor, department manager, Human Resources Business Center Leader, or University Compliance and Ethics to discuss and/or voice any questions or concerns. Concerns related to potential fraud should be reported directly to University Audit. Employees reluctant to report through one of these avenues are encouraged to use the UCF IntegrityLine.

If you become aware of an incident of unlawful discrimination or harassment, sexual harassment, sexual assault, sexual exploitation, relationship violence, or stalking that involves any student and you are not a confidential employee (meaning an employee who is entitled to have privileged communications under state law within the context in which they learned of the incident), you must immediately report the incident to the ONAC or Title IX Coordinator (click "File a Report" tab on the Let's Be Clear website; call 407-823-1336; email at onac@ucf.edu; or visit the Barbara Ying CMMS (Building 81), 12701 Scholarship Drive, Suite 101, Orlando, FL). Also, deans, directors, department heads, and supervisors are required to report to the ONAC all relevant details about an incident of unlawful discrimination. harassment, or retaliation where the respondent (individual or group who has been accused of violating university policy, regulation or procedure) is

a university or direct support organization employee or volunteer. Reporting is required when such deans, directors, department heads and supervisors know (by reason of direct or indirect disclosure) or should have known of such prohibited conduct. More information on this requirement is available on the <u>ONAC</u> website and Let's Be Clear website.

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