

# Employee Code of Conduct

# A Word from our President



Since joining UCF, I have been impressed by the compassion and ingenuity of our faculty and staff. It is clear that Knight Nation cares for each other, and I am confident that we are all here because of the university's greater mission — to change lives and impact society through our tremendous scholarship and service.

Together, you have helped build an amazing culture at UCF. My hope is to add to the optimism and professionalism you show each day by removing the barriers to your success and by creating an

environment where you feel empowered to make a difference.

UCF's duty as a metropolitan public research university is to serve our students, region and state. Let this Employee Code of Conduct guide your actions and allow us all to be the best stewards of the resources and responsibilities entrusted to us. By adhering to these laws, regulations, policies, procedures and ethical standards, we will do our best to represent UCF and remain a place where we are all proud to work.

Thank you for your dedication. I look forward to reaching new heights with you!

Charge On!

Alexander Carhuright, Ph.D. President

This page is intentionally left blank.

# Contents

HONESTY AND INTEGRITY:	
OUR GUIDING PRINCIPLES	5
The Purpose of the UCF Employee	
Code of Conduct	6
UCF Ethical Standards	7
Doing the Knight Thing	8
Asking Questions, Raising Concerns	10
UCF IntegrityLine	11
Protection from Retaliation	12
RESPECT: OUR COMMITMENT	
TO EACH OTHER	13
Dignity and Respect	14
Engaging, Exploring, and Advancing an	
Inclusive Culture	15
Equal Opportunity	15
RESPONSIBILITY AND ACCOUNTABILITY:	
OUR COMPLIANCE COMMITMENTS	17
Compliance and Ethics at UCF	18
Health, Safety, and Security in the Workplace	19
International Considerations	20
Research Integrity and Compliance	21
Intellectual Property and Copyrighted Material	22
Records Management	23
Information Privacy and Security	24
External Communications	26
STEWARDSHIP: OUR DUTY AS	
PUBLIC EMPLOYEES	27
Fiscal Responsibilities	28
Florida Code of Ethics for Public Employees	29
Avoiding Conflicts	30
Outside Activity and Conflict of Interest	
and Commitment Disclosure	32
ADDITIONAL GUIDANCE & RESOURCES	33
Ethical Decision-Making	34
University Contacts	35
FAQs	36



# 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. University Compliance, Ethics, and Risk oversees our compliance and ethics program with support from the Compliance and Ethics Advisory Committee and compliance partners.

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 of 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 embrace, celebrate, and value diversity and inclusion. We respect the ideas of others, even when they differ from our own. We do not tolerate 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 of 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:

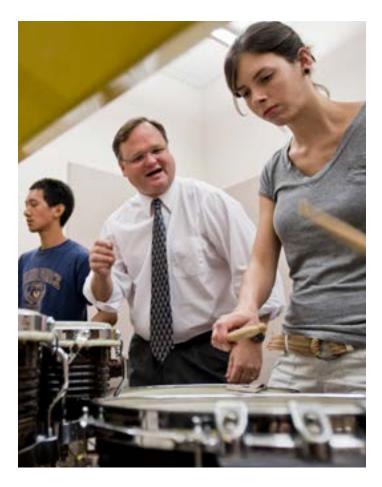
- Is it legal?
- Does it align with UCF standards and values?
- Would it violate UCF regulations or policies?
- Could it affect you financially or provide a personal benefit to you?

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, Ethics, and Risk, 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

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.

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, Ethics, and Risk

Concerns related to potential fraud should be reported directly to University Audit. Sex or gender-based discrimination or harassment, sexual harassment, sexual assault, sexual exploitation, relationship violence, or stalking involving a student must immediately be reported to the Office of Institutional Equity or the Title IX Coordinator (if you are not a confidential employee). More information on this mandatory reporting requirement and contact information is available on the Let's Be Clear website.

The University Ombuds Office is a resource for individuals 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, Ethics, and Risk 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.

### Q&/

# 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 UCF 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 at UCF IntegrityLine, or by calling 1-855-877-6049 toll-free. 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, Ethics, and Risk and 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 inadvertent disclosure of their identity) via the IntegrityLine or other means, University Audit is responsible for determining if the individual qualifies for whistle-blower status. This work and all required documentation to determine whistle-blower status and related protections is performed in accordance with the Florida Whistle-blower's Act (Sections 112.3187-112.31895, Florida Statutes).



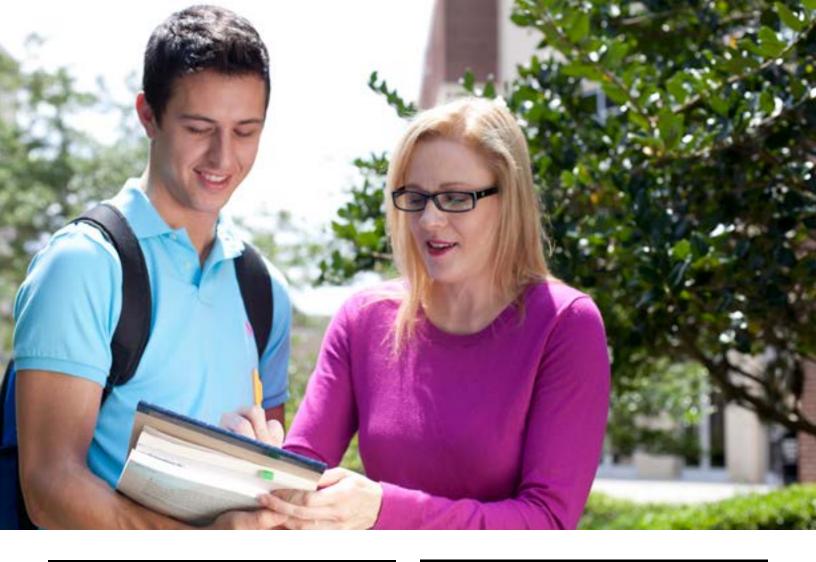
# PROTECTION FROM RETALIATION

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 will not be tolerated. 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 employment action taken against an employee 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 negative performance review. To learn more, please review the Reporting Misconduct and Protection from Retaliation Policy. Protections from retaliation are also included in the Prohibition of Discrimination, Harassment and Related Interpersonal Violence Policy and the Whistle-blower Determination and Investigation Policy.

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

# Respect: Our Commitment to Each Other



# **DIGNITY AND RESPECT**

Here at UCF, we treat each other with dignity and respect. We embrace, celebrate, and value diversity, equity and inclusion and that means that we respect the ideas of others, even when they differ from our own.

In all of our interactions, we are committed to being respectful and positive, and to maintaining an empowering and welcoming environment.

We do not tolerate harassment, mistreatment, belittling, harming, or taking advantage of others.

### 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 inclusive environment for all of our employees. Language or behavior that is offensive will not be tolerated.

If you feel uncomfortable speaking to your coworker directly, you can consult your department supervisor, Human Resources, the UCF IntegrityLine, or University Compliance, Ethics and Risk.

# ENGAGING, EXPLORING, AND ADVANCING AN INCLUSIVE CULTURE

We are strongest as an educational institution, employer, and community leader when we bring diverse thought and experience to our decision-making, teaching, research, and interactions with community members. Accordingly, all members of our university community have a responsibility to treat each other with consideration and respect.

Recognizing that each of us is an intersection of many aspects of diversity emphasizes the complexity of our experiences and the need to develop a culture that appreciates difference and sees diversity as a strength in our role as educational leaders.

### We are committed to:

- engaging with each other, recognizing and valuing each life as exceptional, in agreement or disagreement, in a manner that appreciates our distinctive experience and perspective as an opportunity to learn and to professionally achieve our highest potential, and
- contributing to and holding each other accountable for a culture that honors diversity, expects nondiscriminatory language, acknowledges the dignity of every individual, welcomes the opportunity to learn from and empower each other, recognizes that we are all a collection of identities and experiences rather than a living symbol of a singular stereotype.

Our commitment to diversity, equity and inclusion is demonstrated through the many efforts of the Office of Diversity and Inclusion.

# EQUAL OPPORTUNITY & NONDISCRIMINATION

Our university is committed to providing access to education and employment without regard to race, ethnicity, color, sex (including pregnancy and parental status), sexual orientation, gender identity, gender expression, age, national origin, religion, nonreligion, physical or mental disability, marital status, genetic information, political affiliations, veteran's status, or membership in any other protected classes as set forth in state and federal law. This includes providing reasonable accommodations for employees' and students' disabilities or religious beliefs and practices and ensuring equitable hiring practices. This also includes the prohibition of inappropriate amorous relationships with students and other employees. More information is available on the Office of Institutional Equity website.

We have zero tolerance for any form of discrimination or discriminatory harassment, including sex discrimination, sexual harassment, sexual assault, relationship violence, and stalking. Information and resources for employees is available on the Let's Be Clear website.

### **Related Regulations and Policy:**

UCF-3.001 Non-Discrimination; Affirmative Action Programs

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

UCF-5.020 Religious Observances

UCF 2-004 Prohibition of Discrimination, Harassment and Related Interpersonal Violence



# 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 of our faculty, staff, and students.

In 2011, UCF formed University Compliance, Ethics, and Risk, now led by the vice president for compliance and risk. This office 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) assist in the development of a comprehensive compliance and ethics program and mitigating the compliance and ethics risks at UCF. The purpose of the committee and compliance partner involvement is to ensure consistent communication and development of compliance and ethics programs across the university and promoting a culture of ethics, accountability, and compliance at UCF.

# 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**.

# Q&A

# 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, program, 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 at the UCF Sustainability Initiatives website.

### 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 university-owned 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 unless approved by the university. Additionally, the possession, use, or storage of weapons at events sponsored or hosted at UCF, without university approval, is also prohibited.

# **Related Policies, Regulation and Resources:**

UCF 3-120 University Smoke-Free Policy

UCF 3-122 Campus Safety and Health Policy

UCF 3-115 Alcoholic Beverages on Campus

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

UCF-4.035 Alcoholic Beverages on Campus

UCF Drug-Free Policy

# 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, 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, Ethics, and Risk, or you can submit a report through the UCF IntegrityLine.

# **Export Controls**

We encourage and support open research and the free exchange of ideas, but we are also committed to complying with United States export control laws, regulations, economic 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. and exist to protect our country, its citizens, and the innovative superiority of the U.S. for reasons of national security, foreign policy, competitive trade, and to prevent the proliferation of weapons of mass destruction through use of our military technologies. If you are traveling abroad or engaging in distance learning, or activities that may be subject to export control laws, please contact the Office of Export Controls Compliance for guidance.

# 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 know-how 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, cook-books, recipes, methods, etc. 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 Export Controls Compliance for additional guidance.

### **Related Policies:**

UCF 2-900 International Academic Agreements

UCF 2-901 UCF Policy for All Foreign Nationals

UCF 2-903 Travel to Restricted Destinations

UCF 4-209 Export Control Policy

# RESEARCH INTEGRITY AND COMPLIANCE

Our Office of Research Integrity and 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 free-thinking in our students, graduates, faculty, and staff members. To help us achieve these goals, we have developed specific guidelines to follow when conducting research. See the related policies for more information.

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

- Conflict of Interest
- Research Misconduct
- Export Controls Compliance
- Effort Reporting and Certification
- Facility Security
- Office of Animal Welfare

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

### **Related Policies:**

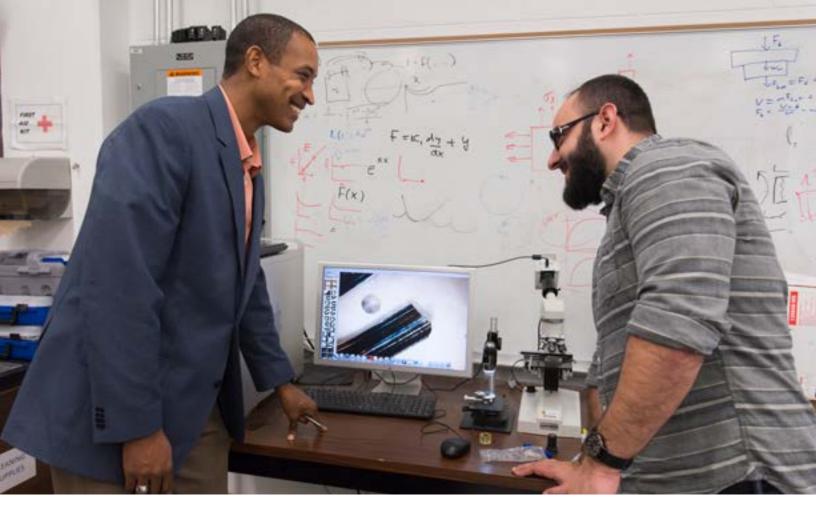
UCF 4-202 Human Research Protections

UCF 4-211 Research Misconduct Policy

UCF 4-504 Reporting a Potential Conflict of Interest or Conflict 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 nondisclosure 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, 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. 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 and to preserve that history 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 the course of our duties, 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 requestor 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 4-005 University Archives



# INFORMATION PRIVACY AND SECURITY

# **Data and Information Privacy**

As an institution of higher learning, 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 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 Regulations (DFAR) and Federal Acquisition Regulation (FAR) requirements on Controlled Unclassified Information
- European Union (EU) General Data Protection Regulation (GDPR)
- National Institute of Standards and Technologies (NIST)
- Other relevant regulations or contractual obligations such as Payment Card Industry Data Security Standards (PCI DSS)

### 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 Registrar's Office website, including a page on FERPA and the following reference sheets:

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

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. Family

Medical Leave Act (FMLA) records are covered under HIPAA. PCI DSS stipulates information security controls on technology and business processes that manage and store credit card data.

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.

# **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, use of, transmission of, storage of, 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 cyber security 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's computing equipment and services:

- Do not share your university password or use your university password on non-UCF websites
- Do not store university data in 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 is required
- Use encryption when storing Highly Restricted data – only use university provided secure location/servers for this purpose
- Do not open email attachments or click on links in an email without properly vetting the sender and the link - Examine carefully the sender and verify with the sender before opening attachments. Examine carefully the link (hover over with mouse pointer) to see where it's 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 sirt@ucf.edu
- 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 security standards, procedures, 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 personallyidentifiable information, financial information (including social security and credit card numbers), or health information; certain contracts; research information; proprietary information, alumni and donor 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 4-008 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 4-016 Email Provisioning, De-provisioning, and Use Policy

UCF-3.045 Sensitive Information Disclosure

# **EXTERNAL COMMUNICATIONS**

### **Media Relations**

To ensure that accurate, appropriate, and consistent messages are provided to the public and media, UCF has designated UCF Communications & Marketing as the division responsible for disseminating news and information with university-wide impact to the public and media. The division is responsible for communicating such news and information through media - including university-owned media and social media. The division assists university departments, staff, and faculty members with how to best communicate news and in their relationships with 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 Office of the General Counsel or University Compliance, Ethics, and Risk 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 available at www.ucf.edu/brand.

### **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 www.ucf.edu/brand/applying-our-brand/social-media/.

### **Related Policies:**

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 our 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 Finance and Accounting 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 interests 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 authority from the president or other university official have the authority to enter into contracts with external entities on behalf of our university. Individuals who enter into contracts without signature authority may subject their departments or units to fines. Such individuals may also be personally liable under contract.

# **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 (P-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 Signatory Authority / Salary Supplement Policy

UCF 2-800 Fraud Prevention and Detection

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

UCF 3-210 Expenditure of University Funds

UCF 4-002 Use of Information Technology 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 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 decision-making process involving a purchase request, who influence the content of any specification or procurement standard, or who render advice, investigation, or auditing regarding our contract for services, may not be employed by a person holding such a contract with UCF.

### 08.4

# 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 his or her official capacity with a vendor are frequently offered to create or maintain a favorable opinion of the vendor to retain or gain our 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, Ethics, and Risk 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 UCF Business Services.

### Q&/

# 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 representation or endorsement 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 his or her 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 his or her 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.

Because the employment of any relative (includes persons who intend to marry or with whom the employee intends to form a domestic partnership or other intimate relationship) creates a potential or real conflict of interest, relatives are not permitted to be employed by, transferred to, or promoted within a single unit, department, or college where a direct or indirect supervisory relationship or 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.

### 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, bias, 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 Prohibition of Discrimination, Harassment and Related Interpersonal Violence

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 University Compliance. Ethics, and Risk and the Office of Research Integrity and Compliance.

# Q&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 Regulation and Policy:**

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

UCF 4-504 Reporting a Potential Conflict of Interest or Conflict of Commitment in Research



# Additional Guidance & Resources



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, embracing and valuing diversity and ensuring that I am not taking advantage of others?

# 3. Responsibility and Accountability

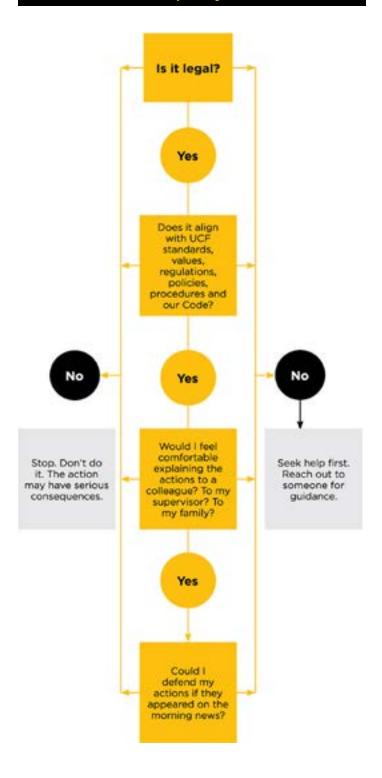
Am I certain that this action is legal and ethically sound?

# 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, Ethics, and Risk, or submit an inquiry through the UCF IntegrityLine.





# **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 partners and a link to the CEAC, please visit compliance.ucf.edu/ourstaff. University Compliance, Ethics, and Risk is also available by telephone (407) 823-6263, email complianceandethics@ucf.edu, or visit the website for more information.

# **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 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 department, or University Compliance, Ethics, and Risk.

# To whom does the Code of Conduct apply?

The UCF Employee Code of Conduct applies to all employees including senior leadership, faculty, and staff members. The Student Code of Conduct (*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 our 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. Refer to Asking Questions, Raising Concerns for 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 affiliate 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 department, or University Compliance, Ethics, and Risk 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 sex or gender-based discrimination or harassment, sexual harassment, sexual assault, sexual exploitation, relationship violence, or stalking that involves any student and you are not a confidential employee (employee who is entitled to have privileged communications under state law), you must immediately report the incident to the Office of Institutional Equity or Title IX Coordinator (407-823-1336; oie@ ucf.edu; 12692 Gemini Blvd. S., Suite 12701 Scholarship Drive, Suite 101, Orlando, FL (Barbara Ying CMMS Building 81). Also, deans, directors, department heads, and supervisors are required to report to the Office of Institutional Equity all relevant details

about an incident of discrimination, discriminatory harassment or retaliation where either the complainant or the respondent is an employee or Direct Support Organization employee. 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 Let's Be Clear website.

36 Last Revised June 2020