



ADMINISTRATIVE POLICY STATEMENT

Policy Title: Code of Conduct

APS Number: 2027

APS Functional Area: **ADMINISTRATIVE/GENERAL**

Brief Description:	This Code of Conduct states the university’s commitment to upholding the highest ethical, professional, and legal standards.
Effective:	November 17, 2016
Approved by:	President Bruce D. Benson
Responsible University Officer:	Senior Vice President and Chief of Staff
Responsible Office:	Senior Vice President and Chief of Staff
Policy Contact:	Ethics and Compliance Campus Contacts (See Section III)
Supersedes:	N/A
Last Reviewed/Updated:	November 17, 2016
Applies to:	All Employees

Reason for Policy: To implement Article 1 of the Laws of the Regents and Regent Policy 1C.

I. INTRODUCTION

This Code of Conduct states the university’s commitment to upholding the highest ethical, professional, and legal standards. As described below, University of Colorado employees must be cognizant of and comply with the relevant policies, standards, laws, and regulations that guide their work.

II. POLICY STATEMENT

A. The University’s Mission

[Regent Law 1.C](#) articulates the university’s mission as follows: “The University of Colorado is a public research university with multiple campuses serving Colorado, the nation, and the world through leadership in high-quality education and professional training, public service, advancing research and knowledge, and state-of-the-art health care. Each campus has a distinct role and mission as provided by Colorado law.”

B. The University’s Values and Ethical Commitment

As members of the University of Colorado community, all employees are responsible for sustaining the highest ethical standards of this institution. As articulated in [Regent Policy 1.B](#), the University of Colorado values ethical behavior, integrity, transparency, and accountability, and strives to integrate these values into its operations.

C. Purpose of the Code of Conduct

The University of Colorado must earn and maintain a reputation for integrity that includes, but is not limited to, compliance with laws and regulations and with its contractual obligations. The Laws of the Regents [Article 1, Part D](#), makes members of the university community responsible for understanding and upholding the highest standards of legal and ethical conduct. The Board of Regents promulgated [Regent Policy 1.C](#) – Principles of Ethical Behavior to set forth broad ethical expectations for the University of Colorado community.

This Code of Conduct is intended to: (i) implement [Article 1](#) of the Laws of the Regents and [Regent Policy 1.C](#); (ii) further define the expectations for university employees; and (iii) provide guidance on the resources available to guide ethical behavior. This Code identifies system-level policies that directly implement the Principles of Ethical Behavior, but this Code is not an exhaustive or comprehensive collection of all policies that effectuate these Principles. The system administration and the administration of each campus, schools, colleges, and departments have all adopted additional policies that complement and effectuate these principles. Each university employee bears responsibility to familiarize himself or herself with all policies applicable to his or her position.

D. Code of Conduct

1. Responsible Conduct

University of Colorado employees are expected to conduct themselves ethically, and in compliance with all applicable laws, regulations, and university policies. University employees are expected to practice and model ethical and responsible behavior in all aspects of their work. Expected conduct includes conducting fair and principled business transactions; acting in good faith; being personally accountable for individual actions; conscientiously fulfilling obligations towards others; and communicating ethical standards of conduct through instruction and example ([Regent Policy 1.C.1](#)).

- The university demonstrates its commitment to responsible conduct beginning during the hiring process, and through multiple statements of expected conduct in the workplace. University employees are subject to background checks upon receiving an offer of employment, pursuant to [APS 5050 - Background Checks](#), and as a condition of their offers of employment, must agree to comply with university laws and policies and with state and federal laws. During their employment, University employees must follow administrative policy statement [APS 4016 - Fiscal Code of Ethics](#) and are subject to controls on their expenditure of university funds.¹

2. Respect for Others

The University of Colorado recognizes that people are the most important resource in accomplishing its mission in the areas of teaching, research, community service, and patient care. The University of Colorado values academic freedom, diversity, and respect for all persons. The university is committed to the principle of non-discrimination and does not tolerate harassment on any basis, including sex, race, ethnicity, religion, gender, sexual orientation, gender identity, gender expression, age, political affiliation, or political philosophy. University employees are expected to treat colleagues, co-workers, and students² with respect, professionalism, and dignity in all interactions and communications ([Regent Policy 1.C.2](#)).

- The Regents have enshrined the principles of academic freedom and non-discrimination in [Regent Law 5.D](#) and [Regent Law 10](#).
- The university has adopted [APS 5001 - Equal Employment Opportunity and Affirmative Action](#) to ensure compliance with its commitment to equal opportunity and affirmative action. Additionally, the University has adopted [APS 5014 – Sexual Misconduct, Intimate Partner Abuse and Stalking](#) to ensure that its students and employees can realize their educational and professional aspirations free from sex discrimination.

¹ As outlined in [APS 4056 - Acceptance of Payment Card Cost and Risk](#) and the [university's procurement rules](#).

² For purposes of this policy, all references to students include trainees and other learners.

3. Conflicts of Interest

As a state institution, it is imperative for both legal and ethical reasons that university employees do not improperly benefit from their positions of trust at the university. University employees are expected to avoid actual and perceived conflicts of interest related to their work and position. Actual or potential conflicts must be appropriately disclosed in accordance with university conflict of interest and conflict of commitment policies, so that such conflicts may be reviewed, and as appropriate, managed or eliminated. To avoid such conflicts, employees are responsible for seeking appropriate guidance.

Conflicts of interest may also arise in the context of gifts, travel, and entertainment. University employees are expected to conduct themselves so as to ensure that their positions are not misused for private gain with respect to the acceptance of gifts and the undertaking of university-related travel or entertainment. University employees may not solicit, accept, or agree to accept any benefit that is intended to influence the employee in the performance of his or her university duties ([Regent Policy 1.C.3](#)).

- The Regents have adopted [Regent Policy 2.A](#) to ensure that individual Regents fulfill their fiduciary obligations, serve the public trust and not allow personal or financial interests to impair their decisions in the university's interest.
- The Regents have also acted to ensure that officers and university staff act in the university's best interest and that they disclose their outside interests per [Regent Policy 3.B](#).
- Conflicts of interest may also occur as a result of interpersonal relationships. To address these possibilities, the university has also adopted [APS 5003 - Nepotism in Employment](#) and [APS 5015 - Conflict of Interest in Cases of Amorous Relationships](#), that govern disclosure and management of amorous relationships and of nepotism in hiring and supervision.
- University employees and students engaged in research are subject to [APS 5012 - Conflicts of Interest and Commitment](#) which requires that each campus adopt a process by which the university's researchers disclose their outside financial interests.
- Some campuses, schools and colleges within the University of Colorado System have developed additional conflict-of-interest policies addressing interactions with industry, receipt of gifts, meals, paid travel or pharmaceutical samples, disclosures of financial ties, ghost writing and speaking engagements. Employees, students and other learners and staff members are expected to understand and comply with these additional obligations.

4. Research and Academic Integrity

As members of a premier research university, employees have significant responsibility to ensure that research and academic work is conducted with the highest integrity, and in compliance with federal and state laws, and university policies. Academic freedom can flourish only in a community that values intellectual integrity. University of Colorado researchers and scholars are expected to protect people and humanely treat animals involved in research or teaching; and follow and demonstrate accountability for sponsors and regulatory body requirements. In addition, all members of the university community are to ensure originality of work, accurately and fairly publish information, and fairly assign authorship credit on the basis of intellectual contributions ([Regent Policy 1.C.4](#)).

- [Regent Law 5.D.2](#) provides that faculty members have the responsibility to: “maintain competence, exert themselves to the limit of their intellectual capacities in scholarship, research, writing, and speaking; and to act on and off the campus with integrity and in accordance with the highest standards of their profession.”
- Research and academic integrity are core university values, and the university has implemented robust compliance programs to actuate them. The university has adopted [APS 5012 - Conflicts of Interest and](#)

[Commitment](#) to govern researcher’s disclosures of outside interests. Each campus also has a policy describing campus processes for collecting such information. [APS 1007 - Misconduct in Research, Scholarship, and Creative Activities](#) articulates expectations regarding research integrity and establishes the role of a Research Integrity Officer on each campus. Accordingly, each campus has a policy on research integrity, and a process for investigating allegations of research misconduct.

- Each campus also has an academic honor code regarding expectations of integrity in student work.

5. Stewardship of University Property

The university is committed to responsible stewardship of university resources, and employees are expected to ensure that university property, funds, and technology are used and disposed of appropriately. These responsibilities include using and disposing of university property, equipment, and resources only for legitimate university purposes; promoting efficient operations; following sound financial practices; and engaging in appropriate accounting and monitoring.

University property includes the university seal, name, and logo. The university regulates the use of its seal, name and related trademarks and logos in order to protect the university's reputation and to ensure that their use is related to the university's educational, research, community service, and patient care missions ([Regent Policy 1.C.5](#)).

University Property

- Pursuant to Regent Law Article 14.B.3, the Chancellor of each campus shall adopt procedures and regulations governing the use of university facilities on each campus.

University Brand

- Stewardship of the university’s brand and trademarks are addressed in multiple policies, including [APS 2025 - University Brand Identity and Logo Usage](#), [APS 2026 - University Trademarks, Trade Names and Service Marks](#), and [Regent Law 2.C](#) on the University Seal, and [Regent Law 14.B](#) on use of the university’s name in advertising.

University Funds

- The University has vested authority for university financial accounts with the Treasurer, and has provided in [APS 4004 - Bank Account and Investment Account Restrictions](#) that only the Treasurer can hold such accounts in the University’s name.
- The University Controller has adopted [fiscal procedures](#) to govern the expenditure of university funds and the process for entering contracts. The University’s Chief Procurement Officer has adopted [procurement rules](#), and a [procurement code of ethics](#), to provide for the purchase of goods to be used in university business, and to ensure that such purchases are made in an ethical fashion.

University Technology

- The university protects its information technology resources through multiple policies, including those provided in [APS 6005 – IT Security Program](#).

Intellectual Property

- The university has adopted a comprehensive scheme regarding intellectual property (including educational materials) while also providing for the commercialization of discoveries and inventions. This is provided in [APS 1013 - Intellectual, Property Policy on Discoveries and Patents for Their Protection and Commercialization](#) and [APS 1014 - Intellectual Property That is Educational Materials](#), and Regent Policies [5.K](#) and [5.J](#).

6. Contributing to a Safe Workplace

The University of Colorado is committed to protecting the health and safety of the university community and creating a safe working and learning environment. Safe workplace practices include participating in applicable training sessions, using appropriate personal safety equipment; and reporting accidents, injuries, and unsafe situations. University employees are expected to conduct their activities in an environmentally responsible manner. This includes carefully handling chemical, radioactive and biological waste, and disposing of hazardous waste and other potentially harmful agents in an environmentally safe manner.

The illegal use and possession of controlled substances and the possession of firearms, explosives, and other weapons on university premises compromises the safety of the university community. The University of Colorado prohibits the unlawful manufacture, distribution, possession, or use of controlled substances and the possession of weapons in or on any premises or property owned or controlled by the University of Colorado (*except as expressly permitted by Colorado law*) ([Regent Policy 1.C.6](#)).

- Each campus has enacted a comprehensive environmental health and safety program to ensure a safe working and learning environment, programs that include extensive training components, use of appropriate personal safety equipment and practices, and avoiding and reporting injuries and unsafe conditions.
- Pursuant to [APS 7008 - Student Behaviors of Concern](#), each campus has convened a Behavioral Evaluation and Threat Assessment team to evaluate reports of concerning behaviors and to intervene where appropriate. Additionally, Regent Law [Article 14.B.6](#) directs the campus chancellors to adopt policies regarding the exclusion of individuals who may present a danger to the university community.
- The university's weapons policy appears in [Regent Policy 14.I](#).
- The university complies with the federal Drug Free Schools and Communities Act, and each campus has adopted relevant policies governing student and employee conduct to ensure a drug-free learning environment.

7. Privacy and Confidentiality

University employees are the creators and custodians of many types of information. Such information may relate to students, employees, alumni, donors, research sponsors, patients and others. Employees are expected to comply with applicable legal, contractual, and policy obligations to maintain the confidentiality of such information, protect it from improper disclosure, and protect the privacy interests of individuals. To meet these responsibilities, University employees are expected to follow document preservation and retention guidelines, and maintain data security using electronic and physical safeguards ([Regent Policy 1.C.7](#)).

- The university collects and utilizes personal information for many educational and business functions, and it is committed to safeguarding such data.
- University employees and departments are expected to adhere to [APS 2006 - Retention of University Records](#). In order to secure the university's electronic information, the university has adopted a suite of policies regarding information technology security, [APS 6005 - IT Security Program](#).
- To ensure student privacy, the university adheres to the Family Education Rights and Privacy Act (FERPA). The university also safeguards health patient data consistent with applicable provisions of the Health Insurance Portability and Accountability Act (HIPAA). In addition, the university has adopted policies governing personal data relating to students and customers ([APS 7003 - Collection of Personal Data from Students and Customers](#)) and patients ([APS 5055 - HIPAA Hybrid Entity Designation](#)).

8. Open and Effective Communication

The University of Colorado is committed to open communication and an environment of transparency. Communicating openly with both internal and external constituents improves relationships and allows the university to operate more effectively. Employees who have questions about a policy, decision, or activity are encouraged to discuss the issue with the individual(s) directly involved before discussing it with others. Supervisors are expected to respond in a timely manner to concerns and communicate with all individuals involved in the matter. The university is committed to providing the community with accurate information regarding the business and affairs of the university. For this reason, and in order to provide a coordinated, accurate, and timely response, all media and legislative inquiries should be directed to the Office of University Relations ([Regent Policy 1.C.8](#)).

- The university fosters a culture of transparency in its governance and its administration. Specifically, it implements this principle through [APS 2022 - Colorado Open Records Act \(CORA\)](#) and through [Regent Law 2.B](#) that provides for regular and open meetings of the Board of Regents.
- In addition, the university's system administration regularly communicates about key administrative developments through available channels such as the CU Connections newsletter.

9. Reporting Suspected Misconduct

The University of Colorado is committed to meeting federal and state legal requirements and fostering a culture of compliance. University employees are expected to report known and suspected violations of university policies, as well as violations of applicable laws and regulations to appropriate offices. The university provides several options for reporting violations. Employees are encouraged to first report any known or suspected violations to their direct supervisor. Fraud, theft, embezzlement, abuse, or waste may be reported to the University Department of Internal Audit. The University's Ethics Hotline (see below) allows individuals to anonymously report concerns involving a possible violation of law, regulation, or policy. All university employees who act in good faith in reporting known or suspected violations of law or university policy are protected from retaliation ([Regent Policy 1.C.9](#)).

- The Regents have articulated their expectations that employees will report suspected fiscal misconduct ([Regent Policy 13.E](#)) which the administration has elaborated through [APS 4012 - Fiscal Misconduct Reporting](#).
- University employees may report suspected misconduct through multiple channels. Often, an employee can report concerns about potential misconduct directly to their supervisors. However, for certain kinds of misconduct or for concerns of a sensitive nature, the university maintains an Ethics Hotline (available at <http://www.ethicspoint.com>). Concerns about suspected fiscal misconduct can also be reported to the contacts listed [here](#). Additionally, each campus maintains procedures by which employees may submit reports of possible discrimination, harassment, bullying, sexual misconduct, intimate partner abuse or stalking.

III. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES, AND OTHER RESOURCES

A. Regent Laws and Policies

- Source of Authority:
 - [Article 1](#) of the Laws of the Regents
 - Regent Policy [1.C](#).
- References to multiple discrete Regent Laws, Regent Policies and Administrative Policy Statements are contained throughout this document.

B. [Ethics and Compliance Campus Contacts](#)

- C. [Principles of Ethical Behavior Website](#) - a site with links to policies, procedures, guidelines and training related to ethical behavior at the University of Colorado.

IV. **HISTORY**

- New policy effective: November 17, 2016.
- Updated: October 1, 2018 (to coordinate changes implemented to APS 5014 – Sexual Misconduct, Intimate Partner Abuse and Stalking).