



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee
August 11, 2017, 9:00-10:00 am
President's Board Room
Conference Call-In Phone #1-800-442-5794, passcode 463796**

AGENDA

- | | |
|---|---|
| I. CALL TO ORDER | Beverly Seay
<i>Chair, Audit and Compliance Committee</i> |
| II. ROLL CALL | Margaret Melli
<i>Executive Administrative Assistant of University Compliance, Ethics, and Risk</i> |
| III. MEETING MINUTES | |
| <ul style="list-style-type: none">• Approval of the April 12, 2017, Audit and Compliance Committee meeting minutes | Chair Seay |
| IV. NEW BUSINESS | Chair Seay |
| <ul style="list-style-type: none">• University Audit Report (INFO-1)• 2016-17 Work Plan Status of All Activities (INFO-2)• 2017-18 Compliance and Ethics Annual Work plan (INFO-3)• Employee Code of Conduct (INFO-4)• University Compliance, Ethics, and Risk Program Update | Robert Taft
<i>Chief Audit Executive</i>

Rhonda L. Bishop
<i>Chief Compliance and Ethics Officer</i>

Rhonda L. Bishop

Rhonda L. Bishop |
| V. CLOSING COMMENTS | Chair Seay |



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee Meeting
April 12, 2017
President's Board Room**

MINUTES

CALL TO ORDER

Trustee Beverly Seay, chair of the Audit and Compliance Committee, called the meeting to order at 10:00 a.m. by teleconference call. Vice Chair Bradley and Trustee Yeargin attended by teleconference call. Trustees Koons and Walsh were present.

MINUTES

The minutes from the December 14, 2016, meeting were approved as submitted.

NEW BUSINESS

University Audit Update (INFO-1)

Robert Taft, Chief Audit Executive, provided an update of the University Audit Department with an overview of the activities and future endeavors.

Amendment to University Regulation UCF 3.018 Conflict of Interest or Commitment; Outside Activity or Employment (AUDC-1)

Rhonda L. Bishop, Chief Compliance and Ethics Officer, introduced Youndy Cook, Deputy General Counsel, who provided an outline of the Amendment to University Regulation UCF 3.018 Conflict of Interest or Commitment; Outside Activity or Employment. The committee unanimously approved the regulation.

2016-17 Work Plan Status of All Activities (INFO-2)

Bishop provided an update of the 2016-17 Work Plan Status of All Activities.

SUS Program Status Checklist and Summary (INFO-3)

Bishop provided an overview of the Board of Governors' SUS Program Status Checklist and Summary, which demonstrates the university's compliance with BOG Regulation 4.003 State University System Compliance and Ethics Programs.

University Compliance, Ethics, and Risk Program Update

Bishop provided an overview of federal NIST 800-171 compliance efforts and updated the committee on the NCAA's confirmation that the university has been restored to full rights and privileges of NCAA membership.

Chair Seay adjourned the Audit and Compliance Committee meeting at 11:04 a.m.

Respectfully submitted: _____
Robert Taft
Chief Audit Executive
Date _____

Respectfully submitted: _____
Rhonda L. Bishop
Chief Compliance and Ethics Officer
Date _____

ITEM: INFO-1

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: University Audit Report

DATE: August 11, 2017

PROPOSED COMMITTEE ACTION

Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment A: University Audit Update

Prepared by: Robert Taft, Chief Audit Executive

Submitted by: Robert Taft, Chief Audit Executive

Attachment A

University Audit Report

August 11, 2017



Agenda

1. Status update on completed and active audits
2. Upcoming audits
3. Other projects and department initiatives
4. Update on Florida Auditor General audits and Board of Governors audit-related activities
5. Audit risk analysis process-review of federal government activity

Recently Completed Audits

Audit Name	Number of Recommendations
Contractor Bid and Selection Process	6
College of Optics and Photonics	6

In Progress Audits

Audit Name	Status
UCF Athletics Association	Draft Report
HIPAA Security	Fieldwork
Exempted and Sole Source Purchasing	Fieldwork
Board of Governors Performance Based Funding Data Certification	Fieldwork

Next Scheduled Audits

Audit Name	Scheduled Kickoff
Environmental Health and Safety	August 2017
Academic Advising	September 2017

Technology Initiatives

1. Morgan Kai Insight Audit Management Software

- *Initial training completed*
- *Cloud-based solution with next generation of electronic workpapers*
- *Project management opportunity*
- *Environmental Health and Safety pilot audit*
- *Future open issues follow-up*
- *Will also be used for investigations and advisory services projects*
- *Coordinate revised objective-based audit approach with new technology*
- *Dropdown risk and control inventories using third party frameworks*

2. Microsoft Skype for Business phones

- *Next generation Voice over Internet Protocol (VOIP)*
- *Cost savings opportunity*

Direct Support Organization (DSO) Consulting Project

- Driven by results of recent DSO audits and interactions
- Intent of the project:
 1. Implementation of leading governance practices used by other universities and non-profit entities
 2. Increased consistency and cooperation between DSOs, where applicable
 3. Improved performance and enhanced ability of DSOs to support the university
 4. Clarification and documentation of responsibilities and accountabilities between UCF and DSOs
 5. Identification of milestones and key performance indicators to periodically reexamine mission, scope, and need for each DSO
 6. Creation of an efficient turn-key process to establish new DSOs based on need and benefit
- Use of third-party consultant – Association of Governing Boards (AGB)
- Internal Project Committee established with DSO and UCF employees

Who is our AGB partner?



Leslie Bram

Retired COO, University of Florida Foundation

Ms. Leslie Bram joined the UF Foundation as its associate general counsel in 1990. She was promoted to associate vice president and chief operating officer in 1994, and in that capacity supervised the administrative and business affairs of the UF Foundation. She retired from the UF Foundation in September of 2014. Bram has previously held several university lecture positions, worked as a private attorney in Philadelphia, and served as associate university counsel and assistant to the vice chancellor for development at the University of North Carolina, Chapel Hill. Bram is a cum laude graduate of the University of Pennsylvania College of Law. Her undergraduate degree is from Carnegie-Mellon University, and she holds a master's degree in English from Northeastern University.

Recent Department Certification and Training

Certifications

- Adam Glover – Certified in Risk and Information Systems Control (CRISC)
- Tina Maier – UCF Graduate Certificate in Public Administration
- Vallery Morton – COSO Internal Control Certificate

Training

- Association of Certified Fraud Examiners Annual Conference
- Compliance and Ethics Higher Education Conference
- Internal Investigations Compliance Conference
- The Chief Audit Executive Master's Program

Auditor General Update

June 14 - Kickoff meeting held at UCF to discuss audits of:

- Financial Statements
- Federal Awards
- Bright Futures Scholarship Program

Board of Governors (BOG) Update

- Proposed State University System Athletic Department financial statement review by Board of Governors Inspector General
- Submission of Audit Department annual report required in September

Government Accountability Office “Top Risks” Report

- Report issued in February 2017 (annual basis)
- Use of five criteria
 1. Leadership Commitment
 2. Agency Capacity
 3. Action Plan Development
 4. Monitored Efforts
 5. Demonstrated Progress
- Additions
 - 2020 Census
- “Top Risks” Potentially Impacting UCF
 - Department of Defense Financial Management and Weapon Systems Acquisition
 - NASA Acquisition Management
 - Federal Real Property Management
 - Strategic Human Capital Management

Government Accountability Office “Top Risks” Report

New Federal legislation implemented to address Top Risks

- Program Management Improvement Act
- Fraud Reduction and Data Analytics Act
- Federal Information Technology Acquisition Reform Act

Report can be found at

<http://www.gao.gov/assets/690/682765.pdf>

Scouting the Horizon

- Research operations
- Foundation fundraising
- IT strategy
- Performance funding
- Downtown campus



Questions?



ITEM: INFO-2

**University of Central Florida
Board of Trustees
Audit, Operations Review, Compliance, and Ethics Committee**

SUBJECT: 2016-17 Work Plan Status of All Activities

DATE: August 11, 2017

PROPOSED COMMITTEE ACTION

Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment B: 2016-17 Work Plan Status of All Activities

Prepared by: Rhonda L. Bishop, Chief Compliance and Ethics Officer

Submitted by: Rhonda L. Bishop, Chief Compliance and Ethics Officer

Attachment B



University Compliance, Ethics and Risk Office

2016-17 Work Plan Status of All Activities

July 1, 2016 – June 30, 2017

UCF's comprehensive compliance and ethics program is based on the elements of an effective compliance program set forth in Chapter 8 of the Federal Sentencing Guidelines. These requirements set forth an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also advancing a culture of ethical conduct. Federal agencies use these guidelines to determine the effectiveness of a compliance and ethics program, and to determine whether the existence of the program will provide safe harbor in the event of noncompliance.

1. Oversight of Compliance and Ethics and Related Activities

Promote accountability among UCF employees for compliance with applicable federal, state, and local laws and regulations, and appoint knowledgeable individuals responsible for developing and implementing a comprehensive compliance and ethics program.

2. Develop Effective Lines of Communication

Create communication pathways that allow the dissemination of education and regulatory information and provide a mechanism for reporting compliance activities or concerns.

3. Conduct Effective Training and Education

Educate the UCF community on its compliance responsibilities, regulatory obligations, and the university compliance and ethics program.

4. Revise and Develop Policies and Procedures

Revise and develop university regulations along with policies and procedures that reflect UCF's commitment to ethical conduct and compliance with applicable laws and regulations.

5. Conduct Internal Monitoring and Compliance Reviews

Identify and remediate noncompliance through proactive review and monitoring of risk areas.

6. Respond Promptly to Detected Problems and Undertake Corrective Action

Conduct timely investigations of allegations of noncompliance and provide guidance on corrective actions.

7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines

Promote the compliance and ethics program and university regulations, policies and procedures, and the consequences of noncompliance.

8. Measure Compliance Program Effectiveness

Evaluate the overall compliance and ethics culture of UCF and the performance of the University Compliance, Ethics, and Risk office.

**2016-17 Compliance and Ethics Work Plan
Status of All Activities
July 1, 2016 – June 30, 2017**

1. Oversight of Compliance and Ethics and Related Activities
Coordinate and conduct bi-monthly meetings of the University Compliance and Ethics Advisory Committee
<ul style="list-style-type: none"> ➤ Chaired the Compliance and Ethics Advisory Committee meetings in October 2016, January 2017, and May 2017. ➤ Introduced and welcomed new members, provided updates on the annual report, culture survey, and annual work plan. Collaborated on Compliance and Ethics Week plans, discussed conflict of interest disclosure, new training developed by the office, and compliance requirements in the Board of Governors Regulation 4.003 and the National Institute of Standards and Technology 800-171 requirements impacting federal grants. Discussed articles planned for the <i>IntegrityStar</i> newsletter editions and received updates from members on their compliance and ethics efforts. Gave overview of the DOE Office of Civil Rights complaints and the minors on campus awareness campaign.
Conduct quarterly meetings with compliance partners and senior leadership
<ul style="list-style-type: none"> ➤ Met with vice presidents, key administrators, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues. ➤ Provided quarterly Athletics compliance update to the president and vice president and executive chief of staff. ➤ Communicated the outcome of the Department of Education’s review of the university’s compliance with the Clery Act.
Serve on and provide compliance guidance to the Title IX workgroup
<ul style="list-style-type: none"> ➤ Provided guidance and support to the Title IX coordinator. Promoted Green Dot training, a nationally known Bystander Intervention program, and highlighted the Title IX coordinator (In the Spotlight) in <i>IntegrityStar</i>. ➤ Served on and provided compliance guidance to the Title IX workgroup and Title IX policy committee. ➤ Chaired the search committee for the Equal Opportunity and Affirmative Action (now Office of Institutional Equity) director position that was vacated during this period.
Serve as a member of the Security Incident Response Team and provide guidance
<ul style="list-style-type: none"> ➤ Served as a member of the Security Incident Response Committee and provided review and guidance associated with federal and state privacy and data breach requirements.

2. Develop Effective Lines of Communication

Prepare and distribute *IntegrityStar*, the compliance and ethics newsletter

- Developed and issued the second, third, and fourth editions of the *IntegrityStar* newsletter to include short training videos, articles on compliance and ethics, announcements on new or revised policies and regulations, training opportunities, and other related information.
- July 2016 edition featured articles on gifts and honoraria, culture survey results, the university policy on reporting misconduct and protection from retaliation, and included a video and cartoon on retaliation.
- October 2016 edition featured articles on Compliance and Ethics Week 2016, revisions to the Fair Labor Standards Act, and an article on ethics with a video and cartoon.
- April 2017 edition covered the theme of respecting others and included articles by compliance partners Karen Morrison, chief diversity officer and Nancy Myers, director of Equal Opportunity and Affirmative Action (now Office of Institutional Equity). Also included was an article titled *Discrimination Hurts Us All*, followed by a short video on respecting others and a cartoon that emphasizes how important all employees are to creating a respectful culture at UCF.

Administer and promote the UCF IntegrityLine

- Continued administration of the UCF IntegrityLine to include review, tracking of all reports, data compilation, trend review, and reporting.
- Continued promoting the UCF IntegrityLine in the *IntegrityStar* newsletter; in compliance videos; in the Compliance, Ethics, and Risk pamphlet; on the University Compliance, Ethics, and Risk website; on the websites of all compliance partners; posters in common areas in buildings on campus including regional campuses; and through distribution of custom IntegrityLine earbuds and wallet cards.
- Continued providing UCF IntegrityLine wallet cards and pamphlets to all new employees during orientation.

Distribute compliance brief videos

- Acquired two new training videos, Respecting Others and Phishing, and used the videos during the Compliance and Ethics Week training sessions in November 2016.
- Distributed a retaliation training video to all employees in the July 2016 edition of the *IntegrityStar* newsletter and an ethics training video in the October 2016 edition.
- Acquired a new training video on the subject of employment of relatives and posted the video on the office's training website.

- Posted the Respecting Others and Phishing training videos from the Compliance and Ethics Week training sessions to the office's training website.
- Distributed the Respecting Others training video to all employees in the April 2017 edition of the *IntegrityStar* newsletter.

Maintain and promote the compliance and ethics website

- Promoted the compliance and ethics website in the University Compliance, Ethics, and Risk pamphlets distributed to all new employees and through each edition of the *IntegrityStar* newsletter.
- Updated the website to include the new editions of the *IntegrityStar*, updated the conflict of interest page, posted additional resources, revised the compliance accountability matrix to include changes to compliance partners, added additional videos to the training page, and updated the organizational chart.

3. Conduct Effective Training and Education

Provide training on ethical leadership and avoiding conflicts of interest to the Student Government Association, Leadership Enhancement Program, and Supervisory Skills Series program

- Provided two training sessions on ethical leadership in September 2016 to the Student Government Association. Served as a mentor in the Leadership Enhancement Program (LEP) hosted by the Office of Diversity and Inclusion, attended LEP meetings, and met with the LEP mentee monthly.
- Served as a panel member in November 2016 training for the LEP hosted by the Office of Diversity and Inclusion, held several meetings with mentee in the program between July 2016 and May 2017, and met with the new 2018 LEP mentee in May.
- Ethical Leadership class for Human Resources (replaced Supervisory Skills Series) in May 2017.

Conduct Clery Act compliance training and develop an online module
<ul style="list-style-type: none"> ➤ Developed and conducted four sessions of Clery Act training for Housing and Residence Life in August and December 2016 and May 2017. ➤ Provided training of the Clery Act to the regional campuses leadership in October 2016. ➤ Developed and conducted Clery Act training for coaches June 2017 and the staff and leadership at the Daytona Beach campus in December. ➤ Purchased Campus Security Authority and Responsible Employee Training videos for use in Clery Act and Title IX training.
Launch second annual Compliance and Ethics week awareness campaign
<ul style="list-style-type: none"> ➤ Scheduled compliance and ethics awareness activities during November 7-10, 2016. ➤ Hosted two brown bag lunch-and-learn training sessions with compliance partners in the Equal Opportunity and Affirmative Action office (now Office of Institutional Equity) and the Information Security Office. Trainings titled Respecting Others were held on November 9, 2016, and Information Security on November 10, 2016. ➤ Developed and launched an online crossword puzzle to all employees on November 7, 2016, and awarded 12 employees with a customized UCF padfolio and UCF IntegrityLine candy jar.
Launch an online ethics training module
<ul style="list-style-type: none"> ➤ Developed an online ethics training module based on the office’s in-person Ethics training. Training is under revision to cover the UCF Employee Code of Conduct.
Develop an online training module for state employees covering state ethics law requirements
<ul style="list-style-type: none"> ➤ Finalized and launched a training titled <i>Potential Conflicts – Florida Code of Ethics for Public Officers and Employees</i>. Training was launched initially to a pilot group of employees and then marketed on the department website. An article in the July 2017 edition of the <i>IntegrityStar</i> will also feature this training.

Issue annual memo on Vulnerable Persons Act

- Completed the Annual Vulnerable Persons Act memo and issued it on March 22, 2017.
- Assessed and identified risks associated with minors on campus.
- Established and coordinated the Minors on Campus Committee.

Identify additional opportunities to develop and deliver compliance and ethics training

- Hosted a table at the New Faculty Orientation in August 2016 and the employee benefits fair in October 2016 to raise awareness of the office and provide education on the UCF IntegrityLine, conflict of interest and commitment reporting, and our *IntegrityStar* newsletter.
- Distributed University Compliance, Ethics, and Risk pamphlets and wallet cards to faculty members and employees during their respective orientations.
- Provided conflict of interest training to research administrators in a joint effort with the Office of Research & Commercialization in September 2016. Training materials were posted online as part of an e-learning program for research administrators that will continue throughout 2017.
- Delivered customized conflict of interest and state ethics laws overview to the new director of the Nicholson School in September 2016.
- Developed and provided 14 Grant Research Award Training sessions: College of Engineering & Computer Science and College of Sciences Mentoring Event, College of Engineering & Computer Science, College of Sciences, College of Medicine, College of Optics & Photonics, Institute for Simulation & Training, and NanoScience Technology to faculty and administrators. This is an ongoing training effort with the Research Compliance Office within the Office of Research and Commercialization to ensure all research faculty members receive training in federal compliance requirements.
- Developed and delivered two open sessions of Ethical Leadership training, one hosted by Human Resources and the other by the College of Medicine Faculty and Academic Affairs.
- Developed and delivered conflict of interest training to the Chairs and Directors Council in April 2017.
- Partnered with the Center for Distributed Learning to improve the online Gifts and Honoraria training for 2017. Marketed and launched the new training.
- Developed Board of Trustee orientation training summary on compliance and ethics at UCF.
- Reviewed and revised PowerPoint training on the conflict of interest and commitment process and provided as online resources.

- Invited to speak on a Compliance Wave webinar in March to highlight how their training materials are utilized by the office. Excellent opportunity to communicate the effectiveness of the compliance program and highlight our compliance partners. As a result of the webinar the University Compliance, Ethics, and Risk office has been contacted from compliance offices throughout the country seeking advice on building their programs.

Issue additional regulatory alerts and updates as appropriate

- Issued the annual communication to all faculty and staff members to remind them of the standards of conduct and reporting responsibilities under Florida ethics laws in October 2016.
- Provided an overview to the president, vice presidents, and senior leadership on the new Board of Governors Regulation 4.003 for compliance programs and the new National Institute of Standards and Technology 800-171 requirements impacting federal programs.
- Communicated receipt of the NCAA close out letter removing UCF from probation and expectations for compliance.

4. Revise and Develop Policies and Procedures

Chair the University Policies and Procedures Committee and provide guidance on policy development

- Chaired the University Policies and Procedures Committee. Provided coordination of the committee and management of the online Policies and Procedures Manual.
- Reviewed and edited policies and procedures prior to submission for approval to the committee. Worked directly with departments, provided guidance, and when needed revised policies to improve content and the communication of expectations to the university community. Reviewed and edited 12 policies that were approved by the committee and president.
- Served on the UCF Health Sciences Health Insurance Portability and Accountability Act (HIPAA) Collaborative, a university-wide task force involved with the development of a single set of HIPAA Privacy and Security policies for the university. Reviewed 16 draft policies, provided guidance, and communicated compliance expectations for the development of policies.

Implement a university-wide Code of Conduct
<ul style="list-style-type: none"> ➤ Drafted and finalized a UCF Employee Code of Conduct that summarizes the compliance and ethics program, expectations for ethical behavior, and highlights important UCF policies and regulations in a reader friendly format. The Code of Conduct educates new and existing employees on the university’s expectations and their responsibilities for ethical behavior and compliance. ➤ Engaged an outside vendor to provide design input and develop the online template. ➤ Partnered with the Center for Distributed Learning to develop a web course that will be provided to all new employees during orientation and its availability will be communicated to existing employees as part of ongoing training.
Implement a gift and honoraria policy
<ul style="list-style-type: none"> ➤ The University Policy and Procedures Committee approved the UCF 2-009 Gifts and Honoraria policy in June and was announced to employees through policy email distribution. ➤ Training is available on the department website and will be marketed with the policy in the July edition of the <i>IntegrityStar</i>.
5. Conduct Internal Monitoring and Compliance Reviews
Manage university-wide conflict of interest and commitment processes
<ul style="list-style-type: none"> ➤ Implemented improvement effort from the conflict of interest and commitment compliance review: developed the process for the president and board of trustees to report research exemptions granted by UCF annually to the governor and legislature as required by state statute. Developed the reports in partnership with the Research Integrity Compliance Office and submitted in February 2017. ➤ Issued the outcome memo for the 2015-16 conflict of interest and commitment disclosure process to the provost in August 2016 announcing the first time UCF achieved a 100% completion rate. ➤ Implemented communication plan for the 2016-17 conflict of interest and commitment online disclosure process in August 2016 and launched the new disclosure year on August 29, 2016. Monitored online disclosure submissions, conducted reviews, and worked with faculty and administrators to resolve potential conflicts. Tracked compliance rates and worked with Academic Affairs to address noncompliance. ➤ Identified a steady increase in the office’s review and mitigation of potential conflicts. This year, the office reviewed and approved 1,056 online disclosures (a slight increase from the 999 last year), with potential conflicts identified in 100 requiring a monitoring plan (an increase from 60 last year). Completed 262 online reviews for the employment of relatives (a significant increase from 77 last year).

- Conflict of interest reviews outside the online system were also tracked and included 125 requests for review of potential conflicts and guidance provided to employees and departments (an increase from 96 last year).
- Partnered with the Research Integrity Compliance Office to strengthen the process for identifying and addressing conflicts requiring research exemptions which resulted in an increase in the number of exemptions. Reviewed and provided input on 30 research exemption requests prior to sending to the provost, president, and chair of the Board of Trustees for approval as required by state statute.
- Received and completed 118 reviews of potential conflicts of interest associated with the attendance at conferences or events sponsored by vendors (an increase in requests from 68 last year).
- Revised university regulation UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment to align with state statutes and submitted edits for review and approval. Revisions were accepted and revised regulation became effective in June 2017.
- Supported compliance efforts of employees meeting the state definition of a reporting individual to include: drafting and distributing awareness emails alerting them of the registered lobbyists at an employee event and the state’s prohibition on accepting promotional items from registered lobbyists, coordinating efforts with Human Resources to identify and notify reporting individuals of the mandatory filing requirements, and monitoring the delinquent list posted on the Commission on Ethics’ website and providing support until all forms were submitted to prevent employees from accruing fines.

Continue compliance partner reporting

- Compliance partners provided updates on their program activities during committee meetings and, when significant issues and challenges arose through separate meetings and discussions.
- Formal annual reports were launched again this year after revisions were made to the annual report template. Developed an annual report schedule that identifies key dates and deadlines to better manage the consolidation of compliance partner annual reports with the activities of the University Compliance, Ethics, and Risk office.

Review UCF IntegrityLine and department database for trends, risk areas, and address appropriately

- Based on closed case reports and database entries of requests made to the office, identified the need for greater employee awareness of the sections of the state ethics laws related to employees having an employment, contractual, or ownership interest in a business entity doing business with UCF.
- Drafted and distributed a detailed summary of the state ethics laws in the annual October 2016 all-employee conflict of interest email.

- Developed a chart to capture the employees who disclosed an outside employment, contractual, and business ownership and began including detailed guidance to them in the reviewer comments section of their online conflict of interest disclosure regarding the section of statute. Logged 49 employees this year.
- Developed and launched the online training titled *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees* to increase awareness efforts on this section of statute.

6. Respond Promptly to Detected Problems and Undertake Corrective Action

Receive and evaluate UCF IntegrityLine reports and allegations of misconduct made directly to the office and conduct investigations

- Provided administration and oversight of the UCF IntegrityLine to include review and tracking of all reports until completion, data compilation, trend review, and reporting. Received 99 reports through the UCF IntegrityLine alleging misconduct (an increase from 71 last year). Coordinated triage of reports with University Audit and the Office of Institutional Equity. When appropriate, reports were referred to a compliance partner or University Audit for review or investigation. During this time, 71 cases were investigated and closed.
- Received 22 allegations of misconduct directly to University Compliance, Ethics, and Risk (up from eight last year) and when appropriate, conducted investigations and provided recommendations for corrective actions and improvement of ethical conduct. Seventeen of these cases were closed.

Provide recommendations for corrective actions and improvement of ethical conduct

- Continued providing recommendations for corrective actions and improvements of ethical conduct to the appropriate authorities following investigations or requests for guidance.
- Worked with Human Resources to establish a process for consulting with University Compliance, Ethics, and Risk when background checks result in findings. Reviewed and provided input on two cases.

7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines

Develop and promote compliance and ethics incentive opportunities

- Offered incentives to employees during Compliance and Ethics week activities.
- Recognized three employees for their outstanding efforts in compliance and ethics in editions of the *IntegrityStar* newsletter.

Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
<ul style="list-style-type: none"> ➤ Three editions of the <i>IntegrityStar</i> newsletter contained the new and revised UCF policies and regulations. ➤ <i>IntegrityStar</i> articles also referenced policies, regulations, and training available. ➤ Distributed notices for policies posted for public review for 12 policies. ➤ Provided overviews of new regulatory requirements to senior leadership, compliance partners, and the Board of Trustees Audit and Compliance Committee.
Promote accountability and consistent discipline
<ul style="list-style-type: none"> ➤ Following investigations with outcome of substantiated employee misconduct, recommended to the appropriate authorities consistent discipline that ensured accountability. ➤ Supported the chair of the research Financial Conflict of Interest Committee to enforce consequences for non-compliance and strengthening its charter. ➤ Continued serving as the point of contact and source for guidance to research compliance related to award management, scientific misconduct, export controls, conflict of interest, and development of policies and procedures. ➤ Collaborated with the Office of Institutional Equity on a case that resulted in discipline that was challenged by the faculty member through various levels of appeal, including arbitration. The arbitrator found in favor of the university, setting a precedent for cases going forward.
8. Measure Compliance Program Effectiveness
Develop and issue the University Compliance, Ethics, and Risk Annual Report
<ul style="list-style-type: none"> ➤ Revised and launched the annual report template to compliance partners for submission by July. All reports will be consolidated with the activities of University Compliance, Ethics, and Risk and issued as the annual report for the university-wide compliance and ethics program.
Interpret Compliance and Ethics Culture Survey results and implement action plan to address weaknesses
<ul style="list-style-type: none"> ➤ Developed and implemented an action plan for increasing awareness of the office and the UCF IntegrityLine. The second Culture Survey will be launched in March 2018 and results will be compared and assessed.

<p>Develop, measure, and track department process improvement efforts using the university assessment process</p>
<ul style="list-style-type: none"> ➤ Outcomes and measures supporting the continuous improvement of several processes such as the conflict of interest and commitment disclosure process, UCF IntegrityLine reporting, and increased awareness efforts continue to be reviewed, measured, and improved. ➤ Achieved two milestones in employee compliance with the annual conflict of interest disclosure requirement: 96% compliance rate with the 30-day deadline for submitting a disclosure and 95% compliance with the 60-day reviewer deadline.
<p>Additional Projects and Accomplishments</p>
<p>Spearheaded Compliance Efforts with National Institute of Standards and Technology 800-171 Requirements</p>
<ul style="list-style-type: none"> ➤ Collaborated with campus partners including UCF Information Technologies and Resources and the Office of Research and Commercialization to develop a working group to prepare for compliance with the National Institute of Standards and Technology 800-171 (NIST) federal requirements affecting multiple areas of the university. ➤ Coordinated bi-weekly meetings and tracked progress of the workgroup’s efforts, providing guidance and support. ➤ Provided senior leadership with an overview of requirements, potential impact and risks to the university, and the resources needed to develop a NIST compliance program and infrastructure.
<p>Compliance with BOG Regulation 4.003 State University System Compliance and Ethics Programs</p>
<ul style="list-style-type: none"> ➤ Revised charters for the UCF Audit and Compliance Committee and University Compliance, Ethics, and Risk to incorporate requirements in BOG regulation 4.003 State University System Compliance and Ethics Programs effective November 3, 2016. ➤ Documented UCF’s completion of 16 of the 19 regulation components and provided response to the BOG in their request for a status update. ➤ Drafted the Compliance and Ethics Program Plan for review by the Audit and Compliance Committee.

<p>Developed Minors on Campus Awareness Committee</p>
<ul style="list-style-type: none"> ➤ Established and coordinated the Minors on Campus Committee consisting of representatives from the Office of Institutional Equity (OIE), Human Resources, Continuing Education, Environmental Health and Safety, Office of the General Counsel, Human Resources, Office of Institutional Equity, Procurement Services, and Student Development and Enrollment Services. ➤ The Committee is charged with developing a university-wide minor protection program and a university policy. ➤ Attended meetings and provided guidance to the Minors on Campus Training Subcommittee.
<p>Department of Education Office for Civil Rights Review</p>
<ul style="list-style-type: none"> ➤ Coordinated with OIE and the Office of the General Counsel to assess complaints received from the Department of Education’s Office for Civil Rights (OCR). ➤ With OIE, identified and assessed request for information, and coordinated initial response. This is an ongoing review and the office will continue to work with OIE and OCR and provide the final response within the deadline set by OCR.
<p>Conducted the Biennial Review of the University’s Alcohol and Other Drugs Program</p>
<ul style="list-style-type: none"> ➤ As part of the university’s compliance with the federal Drug-Free Schools and Communities Act, every two years UCF must conduct a review of the Alcohol and Other Drug prevention program to assess program effectiveness and the consistency of policy enforcement. Organized and served as chair of the Biennial Review Committee, provided an overview of the compliance requirements to committee members, and provided guidance on the analysis and development of the report.
<p>Chaired the State University System Compliance and Ethics Consortium</p>
<ul style="list-style-type: none"> ➤ To support the development of effective compliance and ethics programs at the Florida State University System level, as well as assisting compliance and ethics colleagues with their respective programs, continued service as chair of the Florida State University System Compliance Consortium, provided leadership on the development of the consortium, and coordinated quarterly meetings. Assisted the Board of Governors inspector general in drafting the Board of Governors (BOG) regulations on compliance and ethics programs for SUS schools and provided feedback on the numerous draft BOG regulations affecting both the compliance and audit programs at UCF, including participation in a meeting with the BOG to discuss the draft regulations. The regulations were approved at the BOG meeting November 3, 2016.

Served on the University Assessment Committee and Divisional Review Committee Chair for the President's Division

- Served as the Assessment Divisional Review Committee Chair for the President's Division, voting member of the University Assessment Committee, and Assessment Coordinator for University Compliance, Ethics, and Risk which involved oversight of seven departments in developing their university assessment results from 2015-16 and plans for improvement in 2016-17. Departments achieved exemplary ratings.

Provided Support to Compliance Partners and University Stakeholders

- Continued oversight and support of the outcomes from the Hill International, Inc. (now IKA) project including communicating findings and recommendations from the report in February 2017 and monitoring the construction contract and scope of work for the follow-up engagement.
- Served on hiring committees for new compliance positions within the Office of Institutional Equity and Export Control office.
- Served on the Invitation to Negotiate committee for the Independent Review of Sponsored Programs and Research Compliance.
- Provided Compliance Wave library access to compliance partners in Human Resources, the Tax Division of Finance and Accounting, Office of Institutional Equity, and the Office of Diversity & Inclusion.
- Responded promptly to monthly public records requests from the press for information on the closed IntegrityLine cases, partnered with UCF News and Information and the Office of the General Counsel on cases published in the media and communicated outcomes with the members of the Board of Trustees.
- Continued intake and timely responses to emails submitted to the department email address complianceandethics@ucf.edu and conflict of interest email address PCA@ucf.edu.

ITEM: INFO-3

**University of Central Florida
Board of Trustees
Audit, Operations Review, Compliance, and Ethics Committee**

SUBJECT: 2017-18 Compliance and Ethics Annual Work Plan

DATE: August 11, 2017

PROPOSED COMMITTEE ACTION

Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment C: 2017-18 Compliance and Ethics Annual Work Plan

Prepared by: Rhonda L. Bishop, Chief Compliance and Ethics Officer

Submitted by: Rhonda L. Bishop, Chief Compliance and Ethics Officer

Attachment C



University Compliance, Ethics and Risk Office

Compliance and Ethics Annual Work Plan 2017-18

University Compliance, Ethics, and Risk provides centralized and coordinated oversight of UCF’s ethics, compliance, and risk mitigation efforts through the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessment, and response to reported issues as required by Chapter 8 of the Federal Sentencing Guidelines. These guidelines set forth the requirements of an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also promoting a culture of ethical conduct. The compliance and ethics program is focused on projects that will mitigate risks to the resources and reputation of UCF as well as the careers and professional reputations of its employees.

The following work plan lists the required elements and the activities that will be conducted from July 1, 2017, to June 30, 2018.

1. Provide Oversight of Compliance and Ethics and Related Activities	
Promote accountability among UCF employees for compliance with applicable federal, state and local laws and regulations, and appoint knowledgeable individuals responsible for developing and implementing a comprehensive compliance and ethics program	Coordinate and conduct bi-monthly meetings of the University Compliance and Ethics Advisory Committee
	Conduct quarterly meetings with compliance partners and senior leadership
	Serve on and provide compliance guidance to the Title IX workgroup
	Serve as a member of the Security Incident Response Team and provide guidance
2. Develop Effective Lines of Communication	
Create communication pathways that allow the dissemination of education and regulatory information and provide a mechanism for reporting compliance activities or concerns	Prepare and distribute <i>IntegrityStar</i> , the compliance and ethics newsletter
	Administer and promote the UCF IntegrityLine
	Coordinate timely responses to regulatory and other external agencies
	Maintain and promote the compliance and ethics website

3. Conduct Effective Training and Education	
Educate the UCF community on its compliance responsibilities and regulatory obligations, and on the university compliance and ethics program	Provide training on ethical leadership and avoiding conflicts of interest to the Student Government Association, Leadership Enhancement Program, and Supervisory Skills Series program
	Conduct Clery Act compliance training and promote newly launched online Clery training module
	Develop and provide Ethics training for Finance and Accounting
	Deliver in-person Gifts and Honoraria training
	Launch third annual Compliance and Ethics week awareness campaign
	Develop and launch online Employee Code of Conduct training
	Promote Gifts and Honoraria and Potential Conflicts online training modules and track employee completion
	Issue annual memo on Vulnerable Persons Act
	Identify additional opportunities to develop and deliver compliance and ethics training
Issue additional regulatory alerts and updates as appropriate	
4. Revise and Develop Policies and Procedures	
Revise or develop university regulations along with policies and procedures that reflect UCF's commitment to ethical conduct and compliance with applicable laws and regulations	Chair the University Policies and Procedures Committee and provide guidance on policy development
	Serve as members of the HIPAA Collaborative to develop university policies and procedures on HIPAA compliance
5. Conduct Internal Monitoring and Compliance Reviews	
Identify and remediate noncompliance through proactive review and monitoring of risk areas	Manage university-wide conflict of interest and commitment processes
	Continue compliance partner reporting

	Conduct risk assessment
	Review UCF IntegrityLine and department database for trends and risk areas, and address appropriately
6. Respond Promptly to Detected Problems and Undertake Corrective Action	
Conduct timely investigations of allegations of noncompliance and provide guidance on corrective actions	Receive and evaluate UCF IntegrityLine reports and allegations of misconduct made directly to the office and conduct investigations
	Provide recommendations for corrective actions and improvement of ethical conduct
7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines	
Promote the compliance and ethics program and university regulations, policies and procedures, and consequences of noncompliance	Develop and promote compliance and ethics incentive opportunities
	Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
	Promote accountability and consistent discipline
8. Measure Compliance Program Effectiveness	
Evaluate the overall compliance and ethics culture of UCF and the performance of the University Compliance, Ethics, and Risk office	Develop and issue the University Compliance, Ethics, and Risk Annual Report
	Launch second Compliance and Ethics Culture Survey to benchmark results against first survey
	Develop, measure, and track department process improvement efforts using the university assessment process
9. New Regulations and Special Projects	
	Manage compliance efforts with National Institute of Standards and Technology 800-171 (NIST) federal requirements
	Chair Minors on Campus Committee

ITEM: INFO-4

**University of Central Florida
Board of Trustees
Audit, Operations Review, Compliance, and Ethics Committee**

SUBJECT: Employee Code of Conduct

DATE: August 11, 2017

PROPOSED COMMITTEE ACTION

Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment D: Employee Code of Conduct

Prepared by: Rhonda L. Bishop, Chief Compliance and Ethics Officer

Submitted by: Rhonda L. Bishop, Chief Compliance and Ethics Officer



UNIVERSITY OF CENTRAL FLORIDA

Employee Code of Conduct

A Word from our President



We all share the responsibility to conduct university business with integrity and uncompromising ethical standards. Compliance and ethics are a shared responsibility that require our vigilant attention, cooperation, and determination. My expectation is that each of you demonstrates an unwavering commitment to the highest standards of compliance and ethical behavior.

Our UCF creed emphasizes the core values of integrity, scholarship, community, creativity, and excellence. It is no accident that “integrity” heads the list. Integrity means doing the right thing, at all times. It means being honest, you have to be someone whose word can be trusted. Integrity also means being dependable, consistent, and accountable. We all want to work with someone principled who can be counted on to behave in an honorable way even when no one is looking.

You serve as a role model regardless of your position at UCF and your actions set the tone for a culture of compliance and ethics. Continue to hold yourself and each other accountable; know the laws, regulations, our policies, procedures, and ethical standards, and most important abide by them. This Employee Code of Conduct will help you in those efforts.

Thank you for your dedication, for your many contributions on campus and off, and for being such positive role models for your fellow Knights.

Keep reaching for the stars, GO KNIGHTS, and charge on!

Cordially yours,

John C. Hitt
President



MISSION STATEMENT

We are a public multi-campus, metropolitan research university that stands for opportunity. Our university anchors the Central Florida city-state in meeting its economic, cultural, intellectual, environmental, and societal needs by providing high-quality, broad-based education, and experience-based learning; pioneering scholarship and impactful research; enriched student development and leadership growth; and highly relevant continuing education and public service initiatives that address pressing local, state, national, and international issues in support of the global community.

The five visionary goals that guide UCF

1. Offer the best undergraduate education available in Florida
2. Achieve international prominence in key programs of graduate study and research
3. Provide international focus to our curricula and research programs
4. Become more inclusive and diverse
5. Be America's leading partnership university

UCF Collective Impact Strategic Plan - Our Promise

Harness the power of scale to transform lives and livelihoods.

Attract and cultivate exceptional and diverse faculty, students, and staff whose collective contributions strengthen us.

Deploy our distinctive assets to solve society's greatest challenges.

Create partnerships at every level that amplify our academic, economic, social, and cultural impact and reputation.

Innovate academic, operational, and financial models to transform higher education.

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 at the [UCF Shield 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 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 to address appropriately. All reports will be reviewed, investigated, 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.





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](#).

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.

“As universities across the country and people around the world confront intolerance, hostility, and injustice, I join our UCF family in affirming the dignity of the individual and the respect for all people.”

John C. Hitt, University President

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 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 and inclusion is demonstrated through the many efforts of the [Office of Diversity and Inclusion](#).

EQUAL OPPORTUNITY

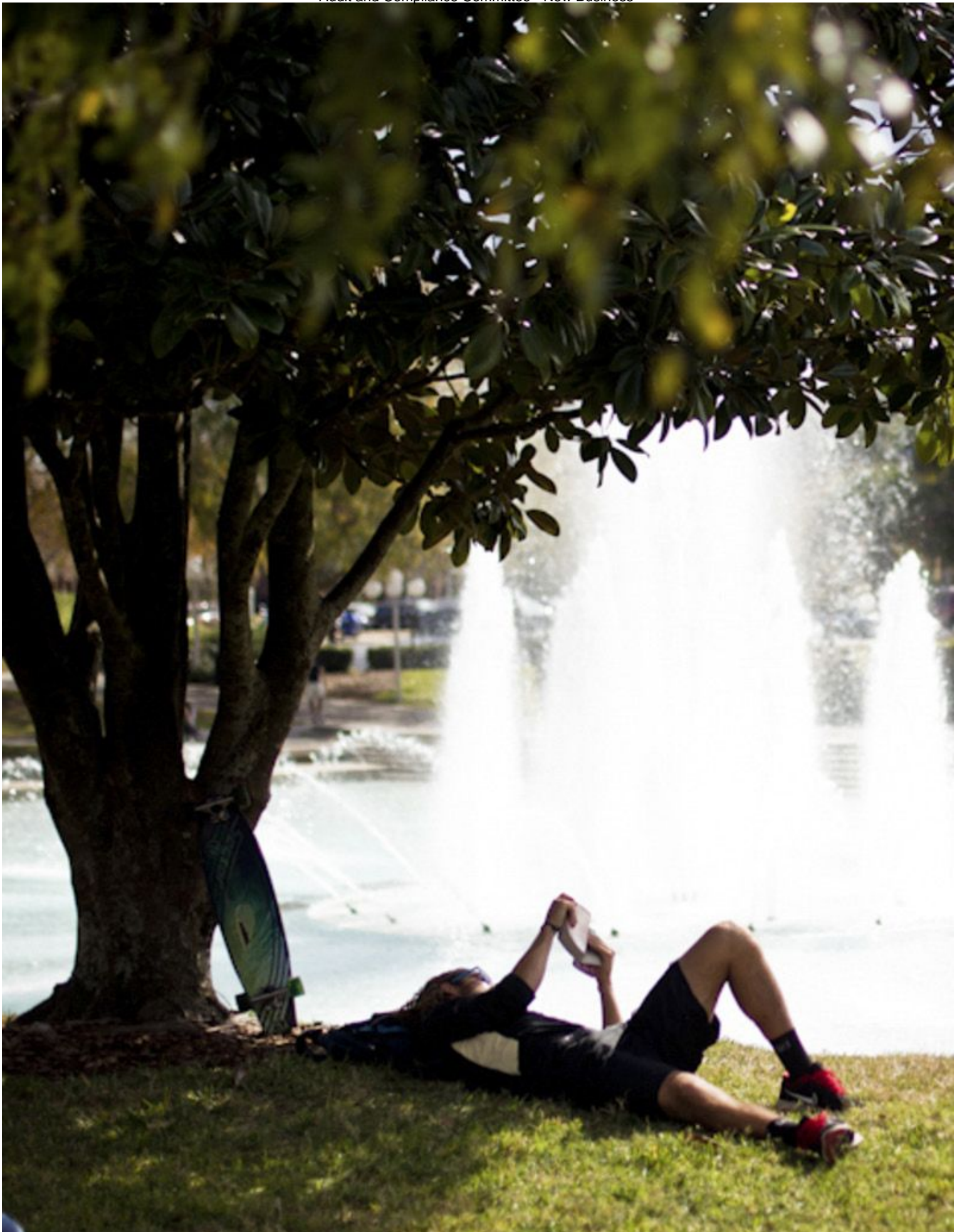
Our university is committed to providing access to education and employment without regard to race, ethnicity, color, sex (including pregnancy and parental status), sexual orientation, gender identity, gender expression, age, national origin, religion (or non-religion), physical or mental disability, marital status, genetic information, political affiliations, prior conviction of a crime, 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 the [UCF Shield website](#).

Related Policy and Regulation:

UCF-3.001 Non-Discrimination; Affirmative Action Programs

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, we formed the University Compliance, Ethics, and Risk office, led by the chief compliance and ethics officer. This office is charged with implementing and sustaining a comprehensive compliance and ethics program based on the key elements of The United States Federal Sentencing Guidelines and the Florida Code of Ethics for Public Officers and Employees. 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 here](#). Our regulations are located [on this website](#). 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

We are committed to energy sustainability and ensuring a productive environment for all members of the university community. Information on our sustainability initiatives and the role employees play in those efforts is available at [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 and Regulation:

UCF 3-120 University Smoke-Free Policy

UCF 3-122 Campus Safety and Health Policy

UCF 3-115.1 Alcoholic Beverages on Campus

UCF 3-119.1 Weapons on University Property and at University Events

UCF Drug-Free 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 anti-corruption 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 the proliferation of weapons of mass destruction or 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 Control 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 Control Compliance](#) for additional guidance.

Related Policies:

- UCF 2-900 International Academic Agreements
- UCF 2-901 UCF Policy for All Foreign Nationals
- UCF 2-903.2 Travel to Restricted Destinations
- UCF 4-209 Export Control Policy

RESEARCH INTEGRITY AND COMPLIANCE

Our [Office of Research and Commercialization](#) 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 and Commercialization works to ensure conduct in the following areas:

- Conflict of Interest
- Research Misconduct
- Export Control 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 policies. If you have questions or concerns, you may contact the [Office of Research and Commercialization](#) for assistance.

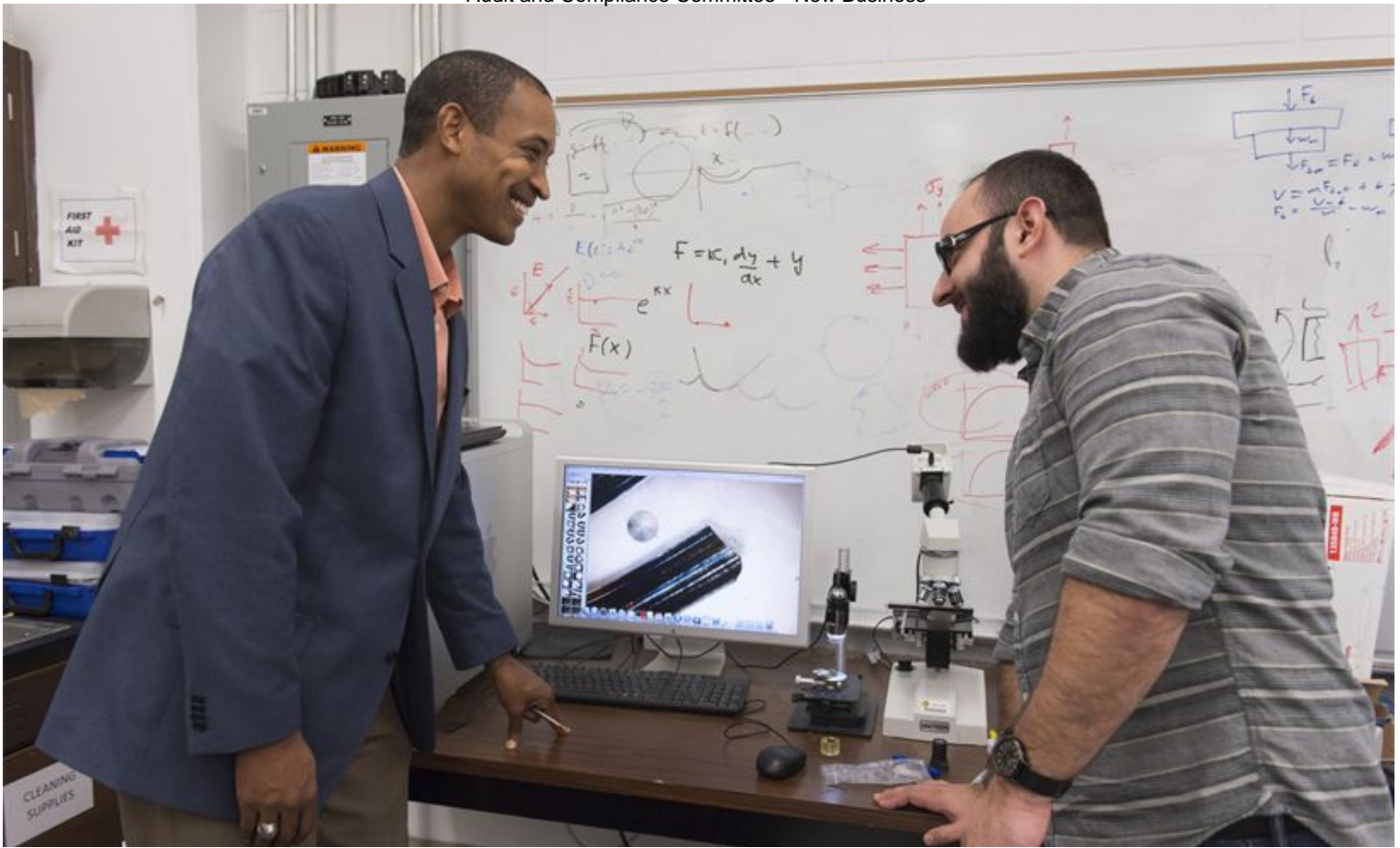
Related Policies:

UCF 4-202.1 Human Research Protections

UCF 4-211 Research Misconduct Policy

UCF 4-504.2 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 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, 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 Resources:

UCF 2-103.2 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 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 University Archives unit, to ensure that our university public records that document the history and activities of the university community are transferred to the 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 2-100.4 Florida Public Records Act: Scope and Compliance

UCF 4-005.1 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
- 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 officer 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 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 changes.

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

It is critical to follow these requirements when using our university's computing services or handling institutional data:

- 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 Google Drive
- Do not send Highly Restricted data via email without approval - 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 IT](#) for general information security standards, procedures, best practices.

Who do I contact to report an information security incident?

Contact 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; 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 2-105.1 Identity Theft Protection

UCF 4-002.2 Use of Information Technologies and Resources

UCF 4-008.1 Data Classification and Protection

UCF 4-012 Collection and Use of Social Security Numbers

UCF-3.045 Sensitive Information Disclosure

EXTERNAL COMMUNICATIONS

Media Relations

UCF News and Information is the primary media and public relations office at UCF and the primary point of contact for news media issues and for coordinating the dissemination of news information to the public. So that we communicate clear, accurate, timely, and appropriate information to the public, employees who have not been authorized to speak on our behalf should refer media requests to a member of our [News and Information](#) team.

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 multiple channels. It is our job to communicate our brand with unity, clarity, and consistency to ensure that people associate our university with credibility and quality. By using our collective voice integrity, we strengthen and share the UCF story. Employees should be aware of and follow the UCF branding guidelines [available here](#).

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 here](#).

Related Policies:

UCF 2-106.1 Communication with Prosecuting Authority

UCF 6-002 News Releases 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 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 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 2-107.2 Signatory Authority Policy

UCF 3-200.1 Receipt and Deposit of Funds by Departments

UCF 4-002.2 Use of Information Technology and Resources

UCF-7.130 Administration and Finance; Purchasing

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.

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 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&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 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 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 3-008.2 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 and Commercialization](#).

Q&A

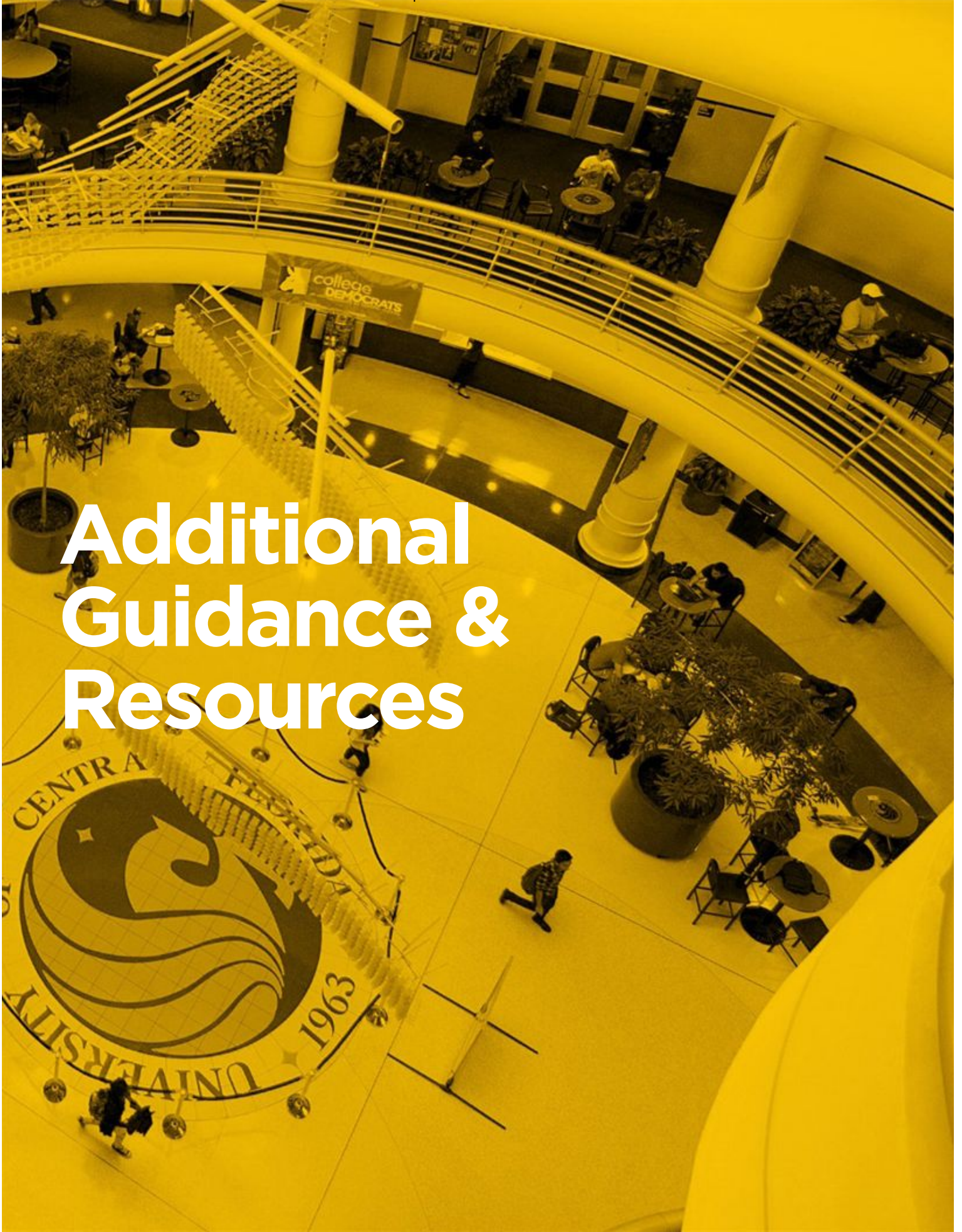
How do I know which activities I am required to list in my outside activity disclosure?

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 Policy and Regulation:

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

UCF 4-504.2 Reporting a Potential Conflict of Interest or Conflict of Commitment in Research



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, 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?

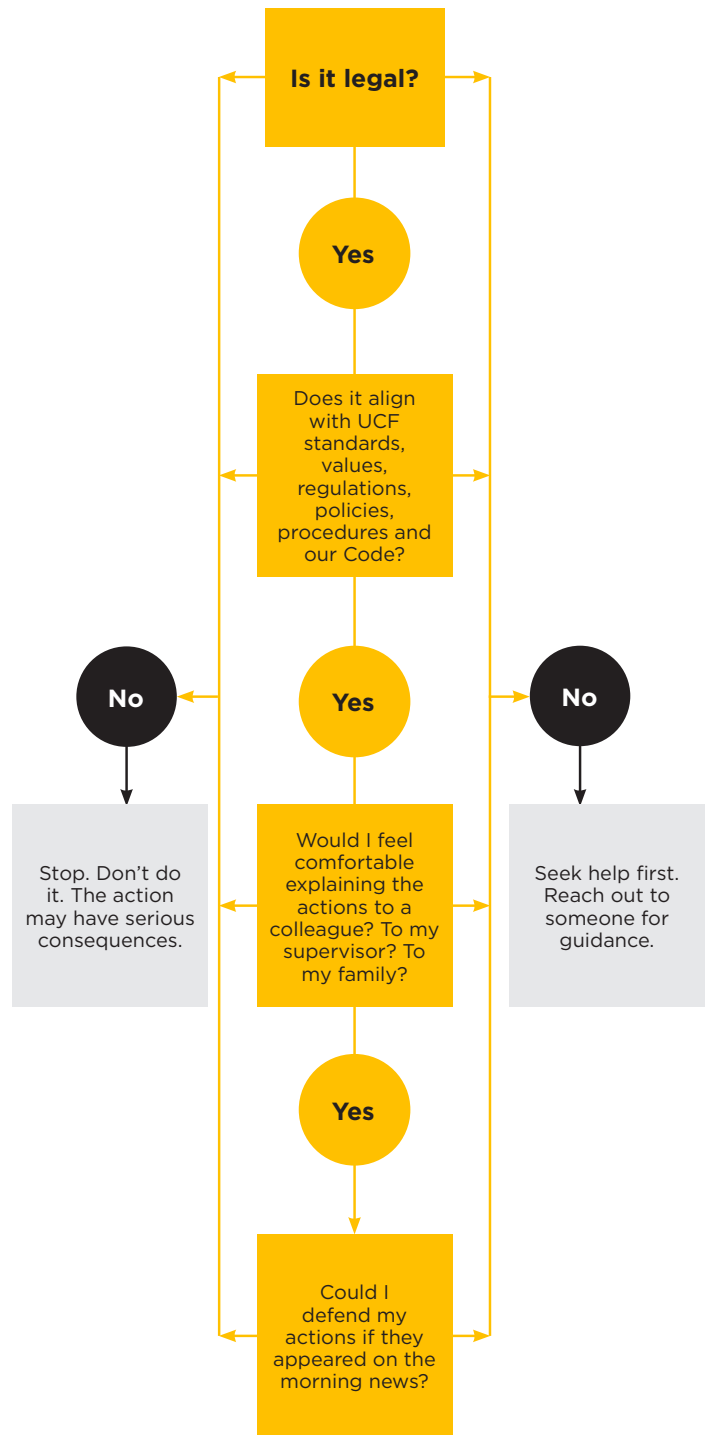
4. Stewardship

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](#).

If unsure, ask yourself:





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, [click here](#). University Compliance, Ethics, and Risk is also available by telephone (407) 823-6263, email complianceandethics@ucf.edu, or visit [UCF Compliance](#) 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 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 to the proper person in charge. 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. 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; oiie@ucf.edu; 12692 Gemini Blvd. S., Suite 123, Orlando, FL). More information on this requirement is available on the [UCF Shield website](#).

