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Statement of Ethical Conduct

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COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK



Statement of Ethical Conduct

Administrative Code of Conduct

Statement of Ethical Conduct

Columbia University expects all officers of instruction, research, libraries, athletics, and administration; support staff; and students to maintain the highest standards of ethical conduct.

Columbia University is one of the world's most important centers of research and at the same time a distinctive and distinguished learning environment for undergraduate and graduate students in many scholarly and professional fields. The University recognizes the importance of its location in New York City and seeks to link its research and teaching to the vast resources of a great metropolis. It seeks to attract a diverse and international faculty and student body, to support research and teaching on global issues, and to create academic relationships with many countries and regions. It expects all areas of the University to advance knowledge and learning at the highest level and to convey the products of its efforts to the world. That commitment upholds the reputation of the University, both locally and globally, and encourages compliance with applicable laws and regulations.

Principles

The basic principles of Ethical Conduct are:

1. Be honest, ethical and truthful.
2. Obey the law. If you are uncertain about what the law or applicable regulations require, seek assistance from your supervisor.
3. Follow University policies and procedures. Make sure you understand your responsibilities. If you have questions about specific issues, you should ask your supervisor. Select University policies are listed in the "Where should I go with a concern?" and "To learn more" sections at the end of this document.

Procedures

1. Report conduct that concerns you. If you believe that an activity may be illegal, unethical or otherwise troubling, you should report it to your supervisor. If your supervisor is involved in the questioned conduct, you should discuss it with the person at the next supervisory level. You could also discuss your concerns with an ombuds officer or report the conduct to the Compliance Hotline 866-627-3768 or other responsible administrative officer. Reports may be made anonymously. University employees may not retaliate against you for any good faith report of improper activity.
2. An individual's failure to live up to these principles may result in disciplinary action, including suspension, termination, and monetary fines consistent with University policy. For violations of applicable laws, individuals may also face criminal and civil penalties, including monetary penalties.

Additional Administrative Policies

Additional and more detailed and explicit policies may govern particular areas of administration such as human resources, finance, information technology or facilities. It is the responsibility of each person working in those areas to learn and adhere to those policies.

The Statement of Ethical Conduct and the Administrative Code of Conduct are not an express or implied contract of employment or a guarantee of future employment. They do not provide any additional rights to any colleague, client, supplier, competitor, trustee, or any other person or entity. The University may modify or amend these documents from time to time within its sole discretion.

Administrative Code of Conduct

Statement of Purpose

Columbia University is a world-class university dedicated to teaching, research, and clinical care. In addition to all of the students and faculty who compose the Columbia community, thousands of staff members are also members of that community. Columbia is not only a place where students, faculty, researchers and clinicians come to do their best work, but also a place where thousands of staff members come to do their best work to advance the various missions of the University.

It is therefore essential to promote an environment that allows everyone who is a part of the Columbia community to do his or her best work, be respected, and have as positive an experience as possible at the University. These expectations are in alignment with the University's high ethical standards and with its goal to continually improve, maintain its status as a world-class university and be an employer of choice.

This policy has been developed to promote the environment of respect that is central to the success of the University and the individuals who work here. The policy articulates the principles that govern interactions at the University and some of the basic expectations that flow from those principles. There are a number of policies that cover specific interactions and situations. This policy does not replace those policies; it provides a framework for them. While this policy does articulate a basic set of expectations and provides examples to articulate some of these expectations, neither is meant to be comprehensive.

Who Is Governed by this Policy

As a statement of principles based on the values of the University, this document can certainly provide sound advice and direction for all interactions between all members of the Columbia community. As a University policy, it specifically applies to Officers of Administration, people applying to the University to be Officers of Administration, and vendors working on behalf of Officers of Administration.

The guiding principle in this document is respect, and the primary goal is the promotion of a positive working environment. Both of these are community values and, therefore are the responsibility of everyone. Regardless of the role someone plays at the University or the level he or she has in an organizational hierarchy, each person has a responsibility to adhere to these principles and promote a positive working environment. Whether someone is working full time, part time, on a temporary basis or as a contractor working on campus for part of a day, each person is expected to adhere to these values and promote a positive working environment.

Statement of Principles to Guide and Govern Interactions

There are four basic principles that guide and govern interactions at the University and promote a positive working environment: respect for governance; respect for others; respect for information; respect for property.

Respect for Governance

Respect for governance is the expectation that members of the Columbia community will act in compliance with the laws, regulations and policies that are in effect and govern behavior at the University and the conduct of University business.

Whether physically on campus or conducting University business, members of the University administration are expected to comply with all city, state and federal laws. When members of the University administration are in another country on University business, they are also expected to act in compliance with all relevant laws.

Columbia University conducts a significant amount of research that is funded by government agencies and private foundations. As a result, a number of rules and regulations govern activities—both for people working directly under grants and contracts and, often, for everyone conducting research and research-related activities. Members of the University administration are expected to act in accordance with these rules and regulations to maintain the highest standards of compliance and fulfill their roles as stewards of these important relationships and resources.

Columbia University is a nonprofit institution and is therefore also subject to federal and state rules that govern nonprofit institutions. The University's status as a tax exempt organization is

central to its mission and financial well-being. Members of the University administration are expected to comply with all rules and regulations pertaining to nonprofit organizations that apply to the University and to act as stewards of the trust entailed in the nonprofit designation.

There are a significant number of laws, regulations, and policies that govern business at the University. Members of the University administration are expected to become familiar with these laws, regulations and policies and are also expected to seek out clarifications when they are not certain about the presence of a governing law, regulation or policy, or have a question about one or more of them.

A respect for governance guides one's own behavior. It is also essential for a community and for a positive working environment. It is, therefore, the responsibility of everyone not to tolerate disregard for and noncompliance with laws, regulations, and policies. Members of the University administration are expected to seek clarifications about possible noncompliance and to report actual and possible violations of laws, regulations and policies. The University has set up a number of mechanisms for inquiry and reporting, is committed to protecting confidentiality, and prohibits any form of retribution against people for reporting violations in good faith.

At the end of this document is a list of referrals and policies that can help people understand the resources at their disposal.

Respect for Others

Respect for others is the central principle that governs interactions between people at Columbia University. Two primary expectations that flow from this principle are to act with civility and to refrain from abuse of power. Respect for others is expected in peer-to-peer relationships, between service providers and people within and outside of the Columbia community, between people who are clients or customers and service providers at the University, and within a supervisory context (e.g., manager-to-employee and employee-to-manager).

Respect extends to those people who are contractors doing work on behalf of the University. Respect also extends to the University's neighbors in interactions that members of the University community have with Columbia's neighbors.

Respect should be present in verbal and written communications. Respect should be shown at meetings, on the telephone and in electronic exchanges.

People have the right to disagree, even strongly disagree; however, there is also a responsibility to be civil and to maintain respect even while disagreeing. Problems, mistakes, and miscommunications can all arise from time to time in the course of business, and could even call for the escalation of seriousness of attention to a situation. Again, there still remains the expectation of respect and civility in interactions.

Respect for others includes a respect for those who are different from you. A positive working environment where everyone can receive respect and do their best work requires a respect and tolerance for difference and diversity.

Respect for Information

Officers of Administration, by the nature of their positions and responsibilities, often have access to information that is confidential, sensitive, and/or personal. In addition to adhering to the rules and regulations that govern the proper handling of information, everyone is expected to respect the privacy of others by respecting the information that pertains to others.

Business at the University can involve sensitive matters, livelihoods, professional reputations and, of course, the reputation of the University itself. People are expected to manage their access to information responsibly and in a manner that respects all of these things. People also are expected to seek clarification and confirmation of information that comes to them, particularly if it seems inconsistent or questionable, so as not to misrepresent a situation or contribute to a misrepresentation or misunderstanding.

Respect for Property

Officers of Administration act as stewards of University property. Property includes physical assets, intellectual property, the University name, and other resources. As a nonprofit organization, largely supported by gifts, donations, government and foundation grants, it is essential to maintain the highest standards of stewardship for the property and resources entrusted to us. Respect for property therefore entails both the efficient and appropriate use of University assets and resources. Members of the University administration are expected to do nothing that would jeopardize the University's reputation or standing with donors, grantors, or the many people who provide hard-earned resources to the University in order to educate members of their family or themselves.

Where should I go with a concern?

The first recommended resource for a clarification on a policy, regulation or law is one's direct supervisor. If a direct supervisor cannot serve as a resource, below are other suggested resources to assist you.

Resource	Description
Your Supervisor	The first recommended resource for a clarification on a policy, regulation or law is one's direct supervisor.
Human Resources Morningside: 212-851-7008 Medical Center: 212-305-3819 www.hr.columbia.edu	Human Resources provides guidance and support for staff on policies that govern employment at the University. Faculty and officers of research should refer to the Faculty Handbook or the Office of Faculty Affairs for policies relating to their appointments at the University.
Compliance Hotline 866-627-3768 www.compliance.columbia.edu	This hotline is a confidential channel for employees to report or seek guidance on possible compliance issues. Callers have the option to report anonymously. The University does not tolerate retaliation against those who report a compliance concern in good faith.
Billing Compliance 212-305-7739 www.cumc.columbia.edu/dept/compliance	The hotline is a confidential 24-hour hotline for Medical Center patients, providers or staff to report billing concerns or related problems to the Office for Billing Compliance.
Office of HIPAA Compliance 212-305-7315 hipaa@columbia.edu www.cumc.columbia.edu/hipaa	The Office of HIPAA Compliance website includes policies, procedures and additional resources for students, faculty and staff about the HIPAA Privacy and Information Security regulations.
Research Compliance and Training 212-851-2897 www.researchcompliance.columbia.edu	The Office of Research Compliance and Training provides support for Columbia faculty and staff to help ensure compliance with the complex web of regulatory requirements that govern research and to develop programming that promotes understanding of compliance issues.
Office of the General Counsel 212-854-4974 www.ogc.columbia.edu	The Office of the General Counsel is responsible for providing a full range of legal services to the University, including: labor and employment, business matters, contract review, litigation, environmental, patents, copyright, property acquisitions, student and faculty issues, entity tax, regulatory compliance, among others.

Resource	Description
Academic Appointments Division **Office of the Provost** 212-854-3813 www.columbia.edu/cu/vpaa/handbook/	The Academic Appointments Division is the division of the Office of the Provost that handles appointments for faculty, officers of research, and student officers. It deals with questions regarding appointments themselves, with the policies governing appointments, and with the processing of appointment paperwork.
Office of Faculty Affairs (CUMC) 212-305-5390 www.cumc.columbia.edu/faculty/faculty-affairs	Faculty Affairs provides support both for faculty and departmental administrators in administrative processes and policies for officers of instruction and of research (including post-doctoral fellows) and student officers.
University Ombuds Morningside: 212-854-1234 Medical Center: 212-304-7026 www.columbia.edu/cu/ombuds	The Ombuds Office offers a safe place for any member of the Columbia community to discuss and to generate options for resolution of workplace issues, interpersonal conflict, academic concerns, bureaucratic runarounds, and many other problems. Discussions are kept confidential.
Athletics Office of Compliance 212-854-8666 www.gocolumbialions.com	The Athletics website serves as an informational resource for all constituents of Columbia University Athletics—including its prospective and current student-athletes, coaches, faculty and staff, alumni, donors, boosters and friends—to ensure the Department and University remain in full compliance with NCAA and Ivy League rules and regulations.
Public Safety Morningside: 212-854-5555 Medical Center: 212-305-7979 www.columbia.edu/cu/publicsafety	Any threat against a person, property or the environment should be directed immediately to Public Safety.
Sexual Harassment *Employee and Third-Party Complaints:* Office of Equal Opportunity and Affirmative Action: 212-854-5918 http://eoaa.columbia.edu/employment-policies	Sexual harassment complaints, including sexual assault, against Columbia employees and third parties engaged in University business are processed through the Office of Equal Opportunity and Affirmative Action.
Student Complaints: Student Services for Gender-Based and Sexual Misconduct: 212-854-1717 www.columbia.edu/cu/dpsa/docs/policy/index.html	Complaints against students for gender-based misconduct, including sexual assault, sexual harassment, gender-based harassment, stalking, and intimate partner violence, are processed through Student Services for Gender-Based and Sexual Misconduct. This policy covers students who attend Barnard College, Teachers College, and Columbia University.

To learn more

A number of resources are available regarding policies, laws, and regulations that govern the University. Each school has additional policies available through their bulletins and Student Affairs offices.

Resource	Description
Administrative Policy Library www.policylibrary.columbia.edu	The Administrative Policy Library provides easy access to administrative policies at the University and includes search capabilities and contact information.
Faculty Handbook www.columbia.edu/cu/vpaa/handbook	The Faculty Handbook provides essential information about the organization and governance of the University; the appointment of faculty and officers of research; and the obligations and responsibilities of academic personnel. It also describes the way visitors to the University may be accommodated.
Essential Policies for the Columbia Community www.essential-policies.columbia.edu	The Essential Policies website contains valuable information to help students, faculty and staff understand the policies and regulations of the University.
Human Resources Policy Manual www.hr.columbia.edu/policies/hr-manual	This manual sets forth personnel policy guidelines to assist managers and supervisors with their operational responsibilities.
Office of the Provost www.provost.columbia.edu/policies	The Office of the Provost website includes copyright policy, Equal Opportunity and Affirmative Action policy, information for faculty, officers of research, and officers of the libraries about additional compensation, housing, and tenure-related policy, rules of University conduct, grievance procedures for students, and reports of interest to academic personnel as well as facts about the University.
Information Technology Policies www.cuit.columbia.edu/cuit/it-policies	The Information Technologies website contains policies regarding the use and security of Columbia's computer systems, networks, and information resources.
Department Administrators' Manual MS: http://managers.hr.columbia.edu/ CUMC: http://ps.columbia.edu/insideps/damanual/	These manuals provide guidance for Department Administrators in their day-to-day work. Consult with your central business office to determine if there is a manual specific to your area.

Resource	Description
Office of the Executive Vice President for Research http://evpr.columbia.edu/	This site provides various resources for Research, including links to relevant University policies and government guidelines that govern the research enterprise and to educational and training resources.
Sponsored Projects Handbook www.sponsoredprojectshandbook.columbia.edu	This Handbook gives practical guidance to faculty and administrative staff of Columbia University in the management of sponsored projects funded by both governmental and private organizations.
Selected Research Policies www.evpr.columbia.edu/content/selected-policies	The Selected Research Policies website highlights selected policies that are often referred to by faculty and staff involved in research.
Clinical Research Handbook http://evpr.columbia.edu/content/clinical-research-handbook	This Handbook gives practical guidance to clinical research coordinators (CRCs) in the management of clinical research.
Animal Research Handbook http://evpr.columbia.edu/content/animal-research-handbook	This Handbook gives practical guidance in the management of animal-based research.
Environmental Health & Safety www.ehs.columbia.edu	The Environmental Health & Safety website provides details on various health and safety policies.
Facilities Management Compliance www.cumc.columbia.edu/facilities-management/compliance/compliance	The CUMC Facilities compliance office can be contacted to discuss any and all facilities-related compliance matters and concerns and to share ideas for improving overall campus safety and accessibility.
Office of University Compliance www.compliance.columbia.edu	For additional information on the Office of University Compliance, including select policies and compliance training links, please visit its website.

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For more information, including an electronic copy of this publication, please go to www.compliance.columbia.edu.

To request this document in large print, please send an email to compliance@columbia.edu. Please allow 1-2 weeks for large print production.

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