

Mount Holyoke College Code of Ethical Conduct

A. Purpose and Scope

In the interest of maintaining and promoting Mount Holyoke College's excellence and integrity, this Code of Ethical Conduct has been adopted, which outlines the general principles to which we subscribe. The Code of Ethical Conduct identifies principles, policies and laws that govern the activities of the college and expectations of proper professional, ethical conduct that reflects the college's values.

We expect every individual who conducts business on behalf of the college - every part-time and full-time employee, faculty member, officer, advisory board member, student employee, volunteer, vendor, agent and contractor - ("Community Members") to adhere to this code . We derive these principles from federal, state, and local laws and regulations, college policies and procedures, contractual and grant obligations, and generally accepted principles of ethical conduct. Sources include, for employees, the [Staff Handbook](#) and relevant union agreements and, for faculty, the [Handbook of Faculty Legislation](#), the [Tenure, Promotion and Reappointment Guidelines](#) and the document on [Faculty Fellowships](#). Community Members should recognize that there can not be a policy to address every situation that may arise. In the absence of a policy Community Members should look to the Code for guidance on appropriate conduct.

B. General Principles

All college Community Members should conduct themselves ethically, honestly, and with integrity in all dealings. They should be fair and principled in their interactions and act in good faith in these matters with others both within and outside the college community. They should act with due recognition of their position of trust with respect to the college and its students, fellow employees, alumnae, parents, research sponsors, and donors.

Given the variety and complexity of ethical questions that may arise in the course of carrying out the college's business, this Code can only serve as a general guide. Confronted with ethically ambiguous situations, Community Members should keep in mind the college's commitment to the highest ethical standards and seek advice from their supervisor, department head or division head to ensure this commitment is honored at all times.

I. Accuracy and Privacy of Records and Reporting

The records, data and information owned, used and managed by the college must be accurate and complete. The accuracy and reliability of records, such as financial reports, academic activity, transcripts and student records, are of vital importance to the business operations of the college. Therefore, all employees and individuals representing the college must record accurately and maintain supporting documentation as required by established policies and procedures with care and honesty. [Example Policies: [Rights and Privacy \(FERPA\)](#); [Computing Policies and Privacy of Information](#) and [Records Retention](#)]

Employees may be privy to confidential information in the course of their daily work. This information may relate to, among others, students, parents, alumnae/i, donors, employees, and candidates for positions on the faculty or staff.

All Community Members must safeguard confidential information. This includes but is not limited to:

- ensuring that confidential documents, in either paper or electronic form, are not left unattended;
- exercising good judgment and care to avoid inadvertent disclosures of confidential information when working with or discussing confidential information in open spaces or in front of others.
- ensuring documents and websites that require authentication are not left open or unattended;
- appropriately safeguarding passwords and authentication measures used to access college records and systems;
- ensuring that confidential paper documents are properly secured and disposed of;

- refraining from engaging in discussion of confidential information in forums where the information may be overheard;
- refraining from giving confidential documents or information to unauthorized persons;
- immediately reporting any loss or misplacement of confidential information, including loss of technology which may contain confidential information, to your supervisor or department head, regardless of causation;
- and protecting the privacy of past and present students, faculty, and staff by maintaining the confidentiality of student, alumnae/i and employee records.

II. Compliance with Laws, Regulations and College Policies

Employees and individuals representing the college must transact college business in compliance with all federal, state, and local laws and regulations related to their positions and areas of responsibility.

Employees and individuals representing the college must comply with all college policies related to their positions and areas of responsibility.

[Example Policies: [Health and Safety in the Workplace](#); [Environmental Health and Safety](#); [Institutional Review Board \(IRB\)](#); [Animal use in Labs](#); [Computing Policies and Privacy of Information](#); [Nondiscrimination](#).]

Employees and individuals representing the college who enter into contracts or accept grants on behalf of the college must comply with contract or grant terms related to their positions and areas of responsibility. [Example Policies: [Federal Grant Purchasing Policy](#); [Contracting Procedures](#); and [Sponsored Research](#)]

All employees and individuals representing the college should recognize that noncompliance with any of these components may have adverse financial and other consequences for them and for the college.

Individuals are responsible for keeping current with changes in applicable laws and regulations, policies and contractual terms.

Managers and supervisors are responsible for monitoring compliance in their areas. Violations may subject individuals to civil or criminal actions in state or federal courts.

III. Conflicts of Interest

Employees should avoid conflicts of interest that might compromise the integrity and objectivity of the individual or the college. Examples of situations involving potential conflicts of interest include:

- working for the college as an outside vendor;
- using information that the college considers privileged or confidential for the benefit of a person or entity inside or outside the college;
- using discounts allowed to the college for personal gain;
- and soliciting for oneself or for a third party anything of value from any person or entity in return for any business or service provided by the college.

Financial conflicts of interest (for example, an employee's partial or sole ownership or management of an entity that regularly does business with the college) should be disclosed, reviewed, and appropriately managed or eliminated.

Employees may not solicit anything of value in return for influencing or exercising his or her discretion in a particular way on a college matter. Faculty and staff should not accept any material gift, gratuity, or other payment, in cash or in kind, from a vendor currently doing business with the college or seeking to do so. Members of the faculty and staff may not solicit or receive discounts or rebates on goods and services offered to them in their private capacity by vendors to the college that exceed those generally available to other customers. Exceptions to this general provision include unsolicited gifts of a nominal value given at holidays, birthdays, weddings, other commonly recognized social occasions, or in recognition for participation in a charitable event . If questions arise about the materiality of a proposed gift or gratuity, the proposed recipient should seek advice from the Comptroller, the Executive Director of Human Resources, or the Director of Risk Management.

Members of the college's Board of Trustees as well as officers of the college and other key employees comply with a [specific policy](#) wherein they sign a Conflict of Interest Statement. [Related policy: [COI Policy](#)] The principles of the Conflict of Interest Statement apply to all Community Members regardless of whether they have to sign the statement.

IV. Protection and Proper Use of College Assets

All members of the community should protect the college's assets and ensure their proper and efficient use. Theft, carelessness, and waste have a direct impact on the college's operations. Any suspected incident of fraud or theft should be reported immediately to a supervisor or department head for investigation. College facilities and equipment should not be used for non-college business, though incidental personal use may be permitted.

The obligation of the community to protect the college's assets includes, but is not limited to, its proprietary information. Proprietary information includes intellectual property such as patents, trademarks, and copyrights, as well as business plans, databases, records, employment information, and any unpublished financial data and reports.

Unauthorized use or distribution of this information violates college policy and may also be illegal and result in criminal and/or civil liability.

[Example Policies: [Computing Policies](#).]

V. Respect for the Rights and Dignity of Others

Mount Holyoke College is committed to equal treatment, opportunity, and respect in its relations with its faculty, staff, students, and others who interact with the college. [Example Policy: [Policy on Nondiscrimination](#).]

Discomfort or difference of opinion between Community Members is not unusual in an academic space; neither necessarily entails lack of respect of the rights or dignity of others. Listening and respecting differences whether they involve an individual's background, political thought, and/or philosophical opinion is an expectation and obligation that each member in the community must share. This code encourages individuals to engage in respectful discourse when in conflict. Community Members should reach out to supervisors, deans, and/or human resources for strategies on how to engage constructively in resolving conflict. When differences are operationalized in a way that creates a hostile environment or discriminatory behavior, Community Members should follow our grievance procedure.

C. Obligation to Report Suspected Violations

Faculty, staff and students are required to report promptly any suspected violations of these standards, of laws and regulations, or of college policies and procedures, to their supervisor, or the Associate VP of Human Resources, the Dean of the Faculty, Dean of Students, the Vice President for Finance and Administration, or the Secretary of the College, depending upon the nature of the violation. Individuals who supervise others should inform their direct reports of their obligations under this Code. Adjudication procedures and sanctions for violations of the Code should be found in the prevailing policies. In the absence of a specific process detailed in the policy, the college reserves the right to discipline individuals found in violation of the Code following progressive action and/or student code of conduct as applicable. [Related procedure: [Grievance Procedure](#).]

D. Promise of No Retaliation

Retaliation against employees for filing reports of suspected violations is strictly prohibited by law and college policy. No member of the college may take any adverse action, retribution, or other reprisal for the good faith reporting of a suspected violation of this Code, even if the allegations ultimately prove to be without merit. The college will take disciplinary action and/or sanction any individual engaging in any retaliatory behavior. See the college's No-Retaliation Policy for more details. In addition, the college will pursue disciplinary action against any member who is shown to have knowingly filed a false report with the intention to injure another. [Related Policy: [Whistle-blower Policy](#).]

Please know there are specific non-retaliation provisions within various policies and processes such as the Grievance Procedures and Sexual Misconduct Policy.

E. Questions & Resources

Please refer questions about the articulation of the Mount Holyoke College Code of Ethical Conduct to the Compliance committee. [[Compliance Committee](#)]

In addition to your supervisor and department head, compliance coordinators and the ombudsperson can also serve as a resource when adhering to this code.

F. Other

The college reserves the right, at any time, and without notice, to amend this Code of Conduct in its sole, good faith, discretion. This Code does not form a contract.

The Mount Holyoke College Code of Ethical Conduct was approved by the Officers on September 19, 2017.

Approved by: The Board of Trustees

Responsible Office: Compliance and Risk Management

Responsible Senior Staff Member: VP of Finance & Administration

Drafted By: Compliance Committee

Mount Holyoke College Acknowledgement of Receipt Code of Ethical Conduct Policy

My signature below acknowledges that I have access to and have received the Mount Holyoke College Code of Ethical Conduct Policy.

My signature also indicates my understanding that the information contained in this policy is considered an official College policy. It is my responsibility to read this policy and familiarize myself with the information contained therein. I understand that I am expected to abide and comply with all College policies and procedures.

Signature

Date

Printed Name

Department

CC: HR Personnel File
Dept. File
Employee