

Policy Timeline

Initial Effective Date: December 1, 2004

Frequency of Review:

Semiannually (twice per year)

Annually

Biennially (every two years)

Other: _____

Date(s) Revised: April 22, 2020

Policy Overview

St. Louis College of Pharmacy is committed to maintaining a campus environment that offers a wide range of professional, social and cultural opportunities and where the well-being of students is the primary focus of all decision-making and actions. A Code of Ethical Conduct (the “code”) is in place to avoid conflicts of interest, legal and/or ethics violations and ensure mechanisms are in place to allow for protected reporting of violations.

Applies to: (examples—Faculty, Staff, Students, etc.)

Faculty, staff and student workers (including all regular and temporary employees)

Policy Details

In order to promote and sustain a culture consistent with our core institutional value of integrity, St. Louis College of Pharmacy expects all employees to conduct themselves in an ethical manner at all times.

Ethical behavior involves more than character. It is a matter of discerning the difference between right and wrong and choosing to act in the best interests of the College when making decisions, interacting with others, and/or handling College funds, assets and records. In order to ensure the highest ethical

standards are maintained, the College adopts the following statements of ethics and professional conduct for its faculty, staff and student workers:

- Employees will not gain unauthorized access to private or confidential information.
- Employees will not improperly alter or destroy College records and supporting documentation in violation of the College's recordkeeping policy.
- Employees will not give anything of value to any person, including public officials and vendors, with the intent to improperly influence any decision or action for the benefit of the employee or the College.
- Employees will not accept anything of value from a third party except as otherwise permitted under College Policy.
- Employees will not falsify business expense reimbursement reports or other College records.
- Employees will not engage in unauthorized or improper political campaign or lobbying activities or use federal funds awarded to the College for such purposes.
- Employees will not use their positions for personal gain or in a manner which would result in a conflict of interest or undue influence over a decision. Personal gain includes a potential financial benefit or other advantage to the employee or immediate family member. Conflicts of interest may be appropriately managed through disclosure and independent review or decision making to protect the College's interest and/or establish an appropriate management plan. Oversight for this responsibility shall lie with the Faculty Governance Committee (for faculty), Office of Human Resources (for staff) and Board of Trustees (for administration). All research related conflicts of interest will be handled in accordance with the Financial Conflicts of Interest Policy and Guidelines.
- Employees will only use College funds and assets for appropriate College business in accordance with College policies and applicable laws even if directed otherwise by an individual of higher rank or position.
- Employees will carry out their duties with honesty, integrity and respect, and all employees will expect honesty, integrity and dignity from others. Specifically, using one's position to harass or intimidate another member of the administration, faculty, staff or students is a serious violation of this Code.
- Employees will support the principle of fairness, protect the civil and human rights of others, and obey local, state and national laws. Except in unusual circumstances, employees will normally be given advance notice and an opportunity to respond to complaints of misconduct or performance issues.
- Employees will maintain the confidentiality of private or confidential information.
- Employees will understand and have the opportunity to contribute to the formulation and evaluation of the College's mission and policies. Employees will be willing to work with others to support the College in its endeavors to implement its mission.
- Employees will recognize the potential for conflict of interest and will refrain from engaging in activities that may interfere with the College's mission.

- Employees have the right to expect to work in a professional and supportive environment and, within the scope of their authority, perform their duties without disruption or harassment. Employees also have the right to refuse to work in unsafe conditions or engage in actions in violation of this Code or any laws.

Employees will communicate potential ethical or law violations to their supervisor, department or division manager, dean or President's Staff representative, or persons identified in the applicable policies and procedures.

Additional reporting contacts include the president, director of human resources and/or general counsel. Any concern(s) relating to the president or a trustee may be reported to the chair of the Board of Trustees or the chair of the BOT Audit Committee.

The College has established a hotline administered by an outside vendor to allow members of the College community to file confidential reports of allegations of improper conduct anonymously or by name. The hotline provides an additional method for reporting improper conduct to give individuals another option to supplement reporting procedures under existing policies.

Reports will be promptly reviewed and investigated. In any case where a violation is substantiated, the College may initiate appropriate corrective action.

Employees will not be threatened, retaliated against or punished for making a good faith report alleging unethical or illegal behavior in others.

The administration will ensure these standards of conduct are communicated throughout the College to administration, faculty, staff, and student workers. Managers and supervisors will monitor compliance in their areas.

Failure to adhere to this code of will result in disciplinary action as outlined in the Faculty Handbook and Staff Handbook.

This code will be reviewed periodically by a committee composed of the general counsel, director of human resources, the chair of the Faculty Governance Committee and Staff Council to ensure its effectiveness in furthering the mission of the College.

Procedures

Employees will communicate potential ethical or law violations to:

- Your supervisor, department or division manager, dean or President's Staff representative
- Responsible office identified in applicable policy or procedure violated. A list of representative offices is a resource to this policy.
- Anonymous Reporting

- Go to stlcop.edu/compliance for more information
- File directly online go to lighthouse-services.com/stlcop
- Submit a Report by Phone
 - 866.770.0009 for English speaking callers in the USA and Canada (not available from Mexico)
 - 800.216.1288 for Spanish speaking callers North America
 - 01.800.681.5340 for Spanish speaking callers from Mexico
- Submit a Report by Email
 - Email reports should be submitted to reports@lighthouse-services.com. You must include the company name “STLCOP” with report.
- Submit a Report by Fax
 - Fax reports should be submitted to 215.689.3885. You must include the company name “STLCOP” with report.

If the person identified in a complaint is party to the potential problem or ethical violation, an employee may report the matter directly to one of the other options above or directly to the general counsel, president or Board of Trustees (in incidents where the president or a trustee is a party to the problem or violation). The College will comply with all applicable laws and regulations requiring disclosure of fraud, bribery or gratuity violations to government agencies or officials including violations affecting a federal grant award.

Responsibilities

Position/Office/Department	Responsibility
Supervisor, department or division manager, dean or President’s Staff Representative	Receiving reports and coordinating with the appropriate office responsible under the identified policy
Responsible office administrator	Responsible for receiving reports and investigating/following up, and reporting
Administration	Ensuring Code of Ethical Conduct is communicated to applicable parties

Resources (required for any resource referred to in the policy)

[St. Louis College of Pharmacy Ethics and Compliance Hotline](http://stlcop.edu/compliance)

stlcop.edu/compliance

Compliance Contacts List

Policy Contacts

Name	Contact Information
Dan Bauer Director of Human Resources	314-446-8308, Daniel.Bauer@stlcop.edu
Ken Fleischmann, General Counsel	314-446-8304, Kenneth.Fleischmann@stlcop.edu
Brenda Gleason Interim Dean of Pharmacy	314-446-8527, Brenda.Gleason@stlcop.edu
Kimberly Kilgore Dean of Arts & Sciences	314-446-8351, Kimberly.Kilgore@stlcop.edu
John Pieper President	314-446-8307, John.Pieper@stlcop.edu

POLICY APPROVALS

POC: **Approved as to Form** **Not Approved**
 POC Chair Signature:
 Date:

Policy Sponsor: **Approved** **Not Approved**
 Signature:
 Date:

President: **Approved** **Not Approved**
 Signature: Approved via email
 Date: 4/23/2020

Board of Trustees: **Approved** **Not Approved** **Not Applicable**
 Chair Signature:
 Date:

Bauer, Daniel C

From: Pieper, John
Sent: Thursday, April 23, 2020 5:17 PM
To: Bauer, Daniel C
Cc: Fleischmann, Kenneth
Subject: Re: Code of Ethical Conduct update for signature

Dan
I approve

Sent from my iPhone

On Apr 23, 2020, at 4:53 PM, Bauer, Daniel C <Daniel.Bauer@stlcop.edu> wrote:

Dr. Pieper,

As part of the hotline implementation we updated the College's code of ethics to include the hotline reporting number.

Attached is a revised Code of Ethical Conduct policy for your signature. The only substantive change compared to the one you signed in January is in the reporting section which now includes the hotline as an option.

We will then use this copy on our website as the final approved version.

Thanks,

<image001.jpg>

DANIEL C. BAUER, PHR, SHRM-CP
Director, Human Resources and Title IX Coordinator

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<Code of Ethical Conduct Policy- FINAL.pdf>