

SPRINGFIELD COLLEGE

CODE OF ETHICAL CONDUCT

I. Purpose:

Springfield College (“College”) is committed to conducting its affairs in ways that promote trust and confidence in its operations. All members of the College community are responsible for sustaining the highest ethical standards of accountability, honesty and integrity, respect and fairness, and for integrating these standards into teaching, research, business practices, and other services and activities. Ethical conduct is a fundamental expectation for every College community member. College community members should exercise good judgment and discretion to conduct all activities of the College ethically and in compliance with applicable law and policy; protect the College from unnecessary risks; and preserve and enhance the assets and reputation of the College for the education and betterment of current and future generations. In that spirit, this “Code of Ethical Conduct” (“Code”) is a statement of our belief in ethical, legal and professional behavior in all of our dealings inside and outside the College.

II. Scope:

This Code applies to all members of the College community, including trustees, officers, faculty and staff, students, volunteers, contractors, agents and others associated with the College. It governs all community members’ conduct while representing the College, utilizing College resources, being on College property, or while attending College functions.

III. Code of Ethical Conduct:

A. Fair Dealing

Members of the College community are expected to conduct themselves ethically, honestly and with integrity in all dealings. This means adhering to principles of fairness and acting in good faith and with respect to laws, regulations and College policies governing our conduct with others both inside and outside the community. Each situation needs to be examined in accordance with this Code. No unlawful practice or a practice at odds with these standards can be justified on the basis of customary practice, expediency, or achieving a desired result or purpose.

B. Individual Responsibility & Accountability

Members of the College community are expected to exercise responsibility appropriate to their position and delegated authorities. They are responsible to each other, the College and the College's stakeholders both for their actions and their decisions not to act. Each individual is expected to conduct the business of the College in accordance with this Code, exercising sound judgment and serving the best interests of the College and College community.

C. Respect for Others

The College is committed to the principle of treating each community member with respect and dignity. The College prohibits discrimination and harassment based on any status protected by law or College policy and provides equal opportunities for all community members and applicants. When dealing with others, members of the College community are expected to:

- Be respectful, fair, and civil;
- Speak candidly and truthfully;
- Value diversity of opinion and contributions of others;
- Strive to be objective in their professional judgment of colleagues;
- Avoid all forms of harassment, discrimination, threats, or violence;
- Provide and promote equal access to programs, facilities, and employment;
- Acknowledge and in good faith follow direction from those to whom they report;
- Not abuse the power or authority of their offices or roles; and
- Promote conflict resolution.

D. Compliance with Applicable Laws & Regulations and Contractual & Grant Terms and Conditions

Institutions of higher education are subject to many of the same laws and regulations as other enterprises, as well as those particular to non-profit entities. There are also additional requirements unique to higher education. Members of the College community are expected to become familiar with the laws and regulations bearing on their areas of responsibility. Many, but not all, legal requirements are embodied in College policies. In addition, every member of the College is expected to maintain access to, and to comply strictly with, the terms and conditions of each College grant and contract on which they are working. Failure to comply can have serious adverse consequences both for individuals and for the College, in terms of reputation, finances and the health and safety of the community. All questions and concerns about the legality or propriety of any action or failure to take action by or on behalf of the College should be referred to the member's supervisor, the Internal Auditor or the General Counsel.

E. Compliance with Applicable College Policies, Procedures and Other Forms of Guidance

College policies and procedures are designed to inform our everyday responsibilities, to set minimum standards and to give College community members notice of expectations. Members of the College community are expected to transact all College business in conformance with policies and procedures and accordingly have an obligation to become familiar with those that bear on their areas of responsibility. Each member is expected to seek clarification on a policy or other College directive they find to be unclear, outdated or at odds with College objectives. It is not acceptable to ignore or disobey policies if one is not in agreement with them, or to avoid compliance by deliberately seeking loopholes.

In some cases, College employees are also governed by ethical codes or standards of their professions or disciplines. It is expected that those employees will comply with applicable professional standards in addition to laws and regulations.

F. Avoidance of Conflicts of Interest

The College is a not-for-profit institution which is dedicated to teaching, research and service. Every member of the College is expected to faithfully carry out their professional duties in furtherance of the College's mission. Every member has a duty to avoid conflicts between their personal interests and official responsibilities and to comply with College policies and guidelines for reporting and reviewing actual and potential conflicts of interest and conflicts of commitment. Additionally, a member may not utilize their position with the College for their own or a relative's personal benefit. In all matters, community members are expected to take appropriate steps, including recusal from a matter as well as consultation if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts.

G. Maintenance of the Highest Standards of Academic Integrity

As part of its educational mission, the College is devoted to the pursuit of knowledge and the respectful free exchange of ideas. The College is committed to achieving the highest standards of teaching and research and to conducting these activities with integrity, honesty, objectivity, fairness, and in compliance with all applicable laws and regulations. Activities such as plagiarism, misrepresentation, and falsification of data are expressly prohibited. Members of the College community pursuing scientific and other academic research are expected to take seriously this commitment. First, members of the College community must conduct their research with rigor, intellectual honesty, and be accountable for sponsors' funds. Second, researchers must comply with specific grant and contract requirements as well as College policies and procedures regarding research. Finally, researchers must comply with all federal and state regulations involving research, including the protection and welfare of human and animal research subjects, and obtain appropriate approval and consents for studies involving such subjects.

H. Records – Confidentiality / Privacy & Access

The College is the custodian of many types of information, including that which is confidential, proprietary and private. Individuals who have access to such information are expected to be familiar and to comply with applicable laws, College policies, directives and agreements pertaining to access, use, protection and disclosure of such information. Computer security and privacy are also subject to law and College policy. All members of the College community must limit their use of such information solely to the purpose for which access to the information was granted.

I. Internal Controls

Internal controls are the processes employed to help ensure that the College's business is carried out in accordance with this Code, College policies and procedures, applicable laws and regulations and sound business practices. They help to promote efficient operations, accurate financial reporting, protection of assets and responsible fiscal management. All members of the College community are responsible for internal controls. Each business unit or department head is specifically responsible for ensuring that internal controls are established, properly documented, and maintained for activities within their jurisdiction. Any individual entrusted with funds, including a principal investigator, is responsible for ensuring that adequate internal controls exist over the use and accountability of such funds.

J. Use of College Resources

College resources may only be used for activities on behalf of the College. They may not be used for private gain or personal purposes except in limited circumstances permitted by existing policy where incidental personal use does not conflict with and is reasonable in relation to College duties (e.g. incidental internet or telephone use in accordance with the College's Responsible Use of Information Technologies Policy). Members of the College community are expected to treat College property with care and to maintain transparency in adherence to laws, policies and procedures for the acquisition, use, maintenance, record keeping and disposal of College property. For purposes of applying this Code, College resources are defined to include, but not be limited to, the following:

- Cash, and other assets whether tangible or intangible; real or personal property;
- Receivables and other rights or claims against third parties;
- Intellectual property rights;
- Effort of College personnel and of any non-College entity billing the College for effort;
- Facilities and the rights to use College facilities;
- The College's name;

- College records, including student records; and
- The College information technology infrastructure.

K. Financial Reporting

All College accounting and financial records, tax reports, expense reports, time sheets and effort reports, and other documents including those submitted to government agencies must be accurate, clear and complete. All published financial reports will make full, fair, accurate, timely and understandable disclosures as required under generally accepted accounting principles for government entities, bond covenant agreements and other requirements in keeping with a non-profit organization.

L. Concern for Health & Safety / Respecting the Environment

The College is committed to protecting the health and safety of its community and the environment and ensuring the security of College premises and facilities. The College community must observe all applicable environmental regulations, standards and policies, and must adhere to sound practices relating to matters of physical safety and environmental health and safety. Individuals should report promptly any threat or risk to health or safety and the environment and should take reasonable steps to promote physical security of themselves and other members of the College community.

IV. Additional Guidance:

This Code is not intended to address every situation, but to make each individual aware of the general scope of ethics and accountability expected as a member of the College community. In many instances, more detailed College policies and procedures exist, which address specific situations and have specific applicability and rest on the above principles. Of course, no code or policy can be expected to include every possible set of circumstances. We all have the responsibility to seek guidance and clarification from the appropriate office, department or supervisor for any questions pertaining to compliance with laws, policies, or these ethical principles.

V. Reporting Suspected Violations / Protection from Retaliation / Enforcement of the Code:

This Code of Ethical Conduct has been created and exists for the benefit of the College and all of its members. It exists in addition to, and is not intended to limit, the specific policies, procedures, and rules enacted by the College. All members of the College community are expected to raise any questions or report any suspected violations of this Code, other College policies, or any federal, state, local law or regulations in accordance with the procedures outlined in the College's Whistleblower Policy (see below for link to Whistleblower Policy). Reporting parties will be protected from retaliation, absent the making of a baseless claim as defined in the College's Whistleblower Policy, for making such a report in accordance with the provisions of the Whistleblower Policy.

After a suspected violation of this Code is brought to the College's attention, the College through duly authorized College personnel will promptly and thoroughly investigate the matter to the extent necessary and appropriate by its usual process, as it has and would for any other breach of its policies. Every member of the College is expected to cooperate fully with any investigation undertaken. Consistent with other applicable College policies involving faculty, staff, and students, disciplinary measures may be taken as a result of such investigation and upon determination of a violation, up to and including discharge from the College community. Additionally, the College may make an appropriate disclosure to governmental agencies, including professional boards of licensure and registration and law enforcement authorities.

VI. Responsible Party/Contact:

Questions regarding this Policy should be directed to:

Christopher M. Neronha, Esq.
Vice President & General Counsel
Marsh
PH: 413-748-3628
cneronha@springfieldcollege.edu

Katherine O'Connor
Internal Auditor
Administration Building
PH: 413-748-3640
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VII. Other Resources:

The College's Whistleblower Policy is available here: <http://springfield.edu/about/college-policies>

Approved by:	President and Leadership Team (09/30/2016) Board of Trustees, Audit & Compliance Committee (10/13/2016) Board of Trustees (10/15/2016)
Date Effective:	November 1, 2016