

EMPLOYEE COMPLIANCE AND ETHICS IN A NUTSHELL

"Ethics is a code of values which guide our choices and actions and determine the purpose and course of our lives." — Ayn Rand, 20th-century Russian/American novelist and philosopher

High institutional and personal ethics are of critical importance to the University of Houston System. Individually and collectively, we are accountable to the taxpayers of the State of Texas to provide a quality educational program utilizing the resources entrusted to our care in accordance with the highest standards of ethics.

This "Brief Practical Guide" has been designed as a quick reference to highlight particular areas of legal and ethical concerns. It provides an overview that combines requirements for compliance with federal and state law, federal and state guidelines, UH System Board of Regent and UH-Downtown policies, standards of ethical conduct and good business practices.

Thank you in advance for being good stewards of the resources provided to us by the taxpayers of the State of Texas. Thank you for your hard work and dedication. You make a difference!

ETHICS POLICY

- ✓ Adhere to applicable laws, rules, regulations and policies of governmental and institutions authorities.
 - ✓ Avoid even the appearance of using your position for personal or family gain.
 - ✓ Apply principles of good faith and honest dealings to all aspects of your job responsibilities.
 - ✓ Submit complete written disclosure of any arrangement that may involve a conflict of interest to your supervisor or department head prior to entering into the arrangement. (Consulting, investment, professional, procurement or research responsibilities.)
 - ✓ Report non-university business activities and arrangements to the Vice President for Administration and Finance annually.
 - ✓ Promptly disclose to management any substantiated violation of any law or institutional policy.
 - ✓ Promptly disclose to management any falsification of records.
-

[CONTACT WITH THE MEDIA](#)

The Division of Public Affairs (713-221-8010) is officially designated as the UHD liaison with all news media and is responsible for planning, coordinating and executing a program of media relations for the University of Houston-Downtown. Contact the UHD Division of Public Affairs:

- If you are contacted or approached by a reporter, photographer, videographer or other news media regarding a university matter or institutional policy,
- When you see a news reporter or photographer on campus,
- Before an interview for free training sessions about what to expect when working with the media, and
- After an interview to capture the results in a newspaper article.

[CONTACTS WITH GOVERNMENT AGENCIES/OUTSIDE INVESTIGATORS](#)

With due consideration given to the legal rights of UHD and its employees, UHD expects to cooperate in government investigations.

If someone from the government contacts you at home or at work without a search warrant or subpoena concerning business of UHD or a component institution, you should request that they make contact with you at work the next business day and then immediately call your supervisor, followed by contact with the Vice President for Institutional Administration and Finance.

[RECORDS AND INFORMATION](#)

Confidential Information: You may not use or disclose for non-business (i.e. non-UHD) related purposes, confidential information gained or available to you as a result of your position. Faculty should be aware that classroom records and student grades are considered confidential and should not be disclosed without permission.

In accordance with the provisions of University of Houston System Administrative Memorandum ("SAM") [03.H.02](#), all requests for public information shall be coordinated through the UHS Office of General Counsel. Because a timeline is triggered when the written request is received, the request must be forwarded the same day to the appropriate administrator as follows:

- The UHD Employee Services and Operations at 713-221-8072 for information stored in the employee records system,
- The UHD Registrar at 713-221-8136 for information stored in the student records system, or
- The UHD Business Affairs at 713-221-8604 for information stored in the financial data system.

Contact the UHD Information Technology office at 713-221-8111 if you have questions regarding the application owner of electronically stored information.

For all other questions regarding requests for documents, contact the UHD Compliance Officer at 713-222-5340.

Accurate Records: Do not alter or destroy or falsify records or documents.

Retention: All records, regardless of their category (financial, academic etc.) must be accurately maintained in the form prescribed by law and by the UH Systems Records Retention Schedule.

Time Keeping: Keep accurate records of the time you work, and the time and reasons for absences. It is a violation of law to falsify or alter the reporting of time worked, salary records or in any way revise university documents or records to provide unearned benefits to an employee or other party.

WORKPLACE CONDUCT AND EMPLOYMENT REQUIREMENTS

Fraud: Employees are required to report suspected or observed fraudulent activity and are protected against any retaliation by the [Texas Whistleblower Act](#). Reports can be made to the Office of Institutional Compliance (713-222-5340), directly to the UH System Director of Internal Audit (Don Guyton at 713-743-8000), or to the State Auditor's Office (www.sao.state.tx.us or 1-800-892-3848). Alternatively, MySafeCampus provides you with a 24 hours a day, 7 days a week anonymous inquiry or reporting option. You can either:

- Log on to www.MySafeCampus.com or
- Call toll-free 1-800-716-9007

Equal Employment Opportunity: Discrimination in any aspect of employment opportunity, training and promotion based on race, color, national origin, religion, sex, age, sexual orientation, veteran status, disability or sexual orientation is a violation of law and should be reported to your supervisor or Employee Services and Operations.

Harassment in the Workplace: UHD policy prohibits harassment based on race, color, religion gender, national original, age (40 and over), disability status, sexual orientation, U. S. veteran status and/or retaliation. You could be disciplined or fired for doing so. Report incidents to your supervisor or to the [Campus Relations/Affirmative Action Officer](#) at 713-222-5366.

Overtime: Non-exempt employees may not work overtime without the permission in advance of your supervisor. Non-exempt employees will be compensated for working over 40 hours per week, either with compensatory time or pay at 1 ½ times regular pay. Exempt employees are not eligible for overtime compensation.

Family and Medical Leave Act: Eligible employees may take up to 12 weeks (26 weeks for military caregiver leave) of available paid leave, unpaid leave or a combination of both, within a twelve month period for serious immediate family illness or the birth or adoption of a child. The employee must use all applicable accrued leave balances, including sick leave and vacation leave, before taking unpaid FMLA leave, unless the employee is receiving temporary disability benefits or worker's compensation benefits. FMLA leave is approved

through the UHD Office of Employment Services and Operations (ESO). Questions regarding FMLA should be directed to ESO.

Outside Employment: Outside employment that conflicts or interferes with your regular work at the University is not permitted. No full-time employee shall be employed by an outside entity until a description of the nature and extent of the employment has been filed with and approved by the appropriate administrative officials in his or her operating unit.

Financial Interests: You may not have a direct or indirect financial interest or special interest in a business or other activity that conflicts with the University's interest or might influence how you do your job at UHD.

RESEARCH

Persons involved in sponsored project activity should become thoroughly familiar with the administrative responsibilities governing the project. These responsibilities include ethical conduct in fostering the highest level of academic inquiry while complying with all applicable regulations, human subject requirements and oversight of students and/or employees.

The Office of Sponsored Programs can provide additional information and assistance at 713-221-8681.

ENVIRONMENTAL HEALTH & SAFETY

Worker Health and Safety: You must perform your duties in compliance with all applicable institutional policies, federal, state and local laws and standards relating to the environment and protection of worker health and safety. Inform your supervisor or the Environmental Health and Safety Manager (713-221-8040) of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken.

Protection of the Environment: Manage and dispose of hazardous materials properly. For guidance regarding your responsibilities or to report an activity that seems inconsistent with policy, please contact the EHS Office at 713-221-8040.

Drugs and Weapons: You may not have or use illegal drugs, alcohol, or weapons at work. You may be disciplined or fired for doing so. You must report to your supervisor or UHD Employment Services and Operations within 5 business days if you are found guilty of controlled substance abuse that has occurred in or on UHD property.

CONTRACTS AND AGREEMENTS

Do not sign a contract or agreement on behalf of UHD unless you have proper authority in writing to execute the document and all required actions have been taken. Areas and levels of signature authority can be found on the UHD web site at: [Who Can Sign Contracts?](#)

USE OF UHD AND STATE OF TEXAS RESOURCES

Use of State Property: Generally, you may not use the University's property for non-work activities. Incidental personal use of information technology resources (phones, computers, *et al.*) is allowed if such use does not result in added cost to the University or hinder your work performance. Check with your supervisor if you have questions.

Computer Software: Employees who use software licensed to UHD and UH System must abide by applicable software license agreements and may copy licensed software only as permitted by the license. Direct any questions you have about applicable software license agreements to your supervisor or UHD Information Technology – User Support Services at 713-221-3000 or 713-221-8031.

Information Security and Confidentiality: Employees must not disclose confidential University information. Student records and health records are subject to additional legal safeguards. Requests for documents under the [Texas Public Information Act](#) should be submitted in writing to the UH System Office of General Counsel (OGC) through:

- Employment Services and Operations at 713-221-8072 for employee information,
- The Registrar at 713-221-8136 for student information,
- Business Affairs at 713-221-8604 for financial information, or
- The Compliance Officer at 713-222-5340 for all other information.

The request triggers a timeline, so it must be forwarded to OGC the same day.

Computer System Access and Passwords: You are responsible for the selection and protection of a secure password. You may not access computers, systems, or networks without authorization.

Purchasing: You may not spend University funds except as authorized. Generally, you may not buy things from or sell things to the University without special prior approval from the UHD Vice President for Administration and Finance.

Follow the policy on purchasing from HUBs (Historically Underutilized Businesses). The UHD Purchasing Department (713-221-8062) has the authority to purchase supplies, materials, services, and equipment for UHD.

COPYRIGHT AND INTELLECTUAL PROPERTY

Use of Copyrighted Materials: In general, you must obtain permission from the copyright owner to use his or her work. For systemic copying, check with the UH System Office of General Counsel through the UHD Compliance Officer.

Intellectual Property: Generally, the UH System Board of Regents owns the rights to inventions, research and writings created by an employee within the scope of employment with UH System facilities and state financial support. This includes research supported by federal funds or third party sponsorship

An employee must disclose the intellectual property for review to the UH System Office of Intellectual Property Management through the UHD Vice President for Administration and

Finance. Disclosure should occur well before making it publicly known or applying for government approvals.

The University will not assert ownership of copyright developed by faculty, staff or students, unless separately contracted for, in items such as books, journal articles, texts, lecture related materials, musical works, dramatic works or works of visual arts.

POLITICAL ACTIVITY AND CONTRIBUTIONS

Political Activities: You may not participate in political activities during work hours or at other times if it interferes with your work duties. Generally, you cannot use UHD equipment or supplies to perform or participate in political activities.

Contributions: You may not use UHD funds to make political contributions.

GIFTS, GRATUITIES, ESTATES AND HONORARIA

Gifts to UHD: Faculty and Staff may receive gifts or endowments but are not authorized to process them on behalf of the University. The UHD's office of University Advancement at (713) 221- 8402 handles this process.

Gifts to Influence You: You may not solicit, accept or agree to accept any gift, favor, privilege, benefit, service, exemption or thing of value that might influence your decision..

Generally, you may keep a non-cash gift if the value is less than \$50.00 dollars. However, an employee may not accept a gift, regardless of the amount, if there is reason to believe that the gift is being offered to influence your decision as a UH D employee. Anyone having business with UHD as a client, contractor, or vendor is likely to be seen as attempting to curry favor by providing any gift or benefit to the employee

Gifts from Persons Doing Business with UHD: Do not ask for or accept such gifts.

Honoraria: By state law, you may not solicit, agree to accept or accept an honorarium based upon your position at the university. This excludes food, transportation and lodging associated with the service provided.

If you are asked to speak or work in your non university capacity, you can accept provided you comply with the university outside employment policy. You will need to take leave if you work during normal UHD working hours. In addition, the payment from any UHS component university must be made through the UHS payroll system