

Policy Number: UFCD, HR, 1.03
Effective Date: September 27, 2007
Last Revised Date: December, 2019
Next Review Date: December, 2020
Policy/Guideline Custodian: Director, HR
Category: Human Resources

Title
Code of Conduct
Policy

Policy Statement

At the University of Florida, College of Dentistry (UFCD), we are committed to conducting business lawfully and ethically. UFCD’s reputation is the sum of the reputations and actions of its employees. To protect its reputation and the reputation of those who work here, UFCD has established this Code of Conduct to assist employees in achieving the compliance goals of the organization. The Code of Conduct is primarily concerned with the following basic principles: A) be honest, ethical, and truthful, B) maintain a high level of professionalism, C) promote a safe and cooperative environment and D) obey the law. Thus, the Code of Conduct also addresses the following six principles: 1) legal and regulatory compliance, 2) business ethics, 3) conflicts of interest, 4) appropriate use of resources, 5) confidentiality and 6) active participation in continued compliance efforts.

UFCD is a public institution dedicated to providing the highest level of education, research and patient care. In pursuing these missions, UFCD expects all of its employees to act ethically and to meet or exceed all legal obligations in the performance of their job duties. Thus, all employees of UFCD must abide by the Code of Conduct. As a condition of employment, every employee of UFCD is required to fully comply with UFCD policies and procedures. By reviewing the Code of Conduct, attending scheduled training courses, and reading policies, you will become familiar with the legal requirements specific to your job and recognize circumstances that may raise compliance issues. This Code of Conduct has been adopted to ensure that these expectations are understood and met.

A. Be Honest, Ethical, and Truthful: Every employee is expected to adhere to the highest ethical and professional standards. Particular care should be taken to ensure that all communications within UFCD and to outside agencies are truthful, accurate and complete. In addition, confidential information relating to UFCD should also be protected. All employees are expected to respect confidentiality issues including, but not limited to:

- Patients' health information to be handled appropriately per HIPAA guidelines.
- Student records be handled appropriately per FERPA guidelines.
- The scientific community is expected to adhere to exemplary standards of intellectual honesty in the formulation, conduct, and reporting of scientific research per NIH RCR guidelines.

B. Maintain Professionalism: All employees must conduct themselves in a professional manner and treat others with courtesy and respect. This includes adherence to UFCD attendance policy as well as behavior within and outside the work environment and working hours. Intimidating and disruptive behaviors will not be tolerated. All employees are expected to avoid disruptive behaviors, including but not limited to:

- Verbal, written or physical outbursts, shouting, use of profanity, hostile or demeaning communications, verbal or non-verbal threats and criticism of performance in an inappropriate setting
- Retaliation against persons who report unacceptable behaviors
- Any form of discrimination and harassment, to include creating a hostile work environment

C. Promote a Safe and Cooperative Environment: All employees must work to ensure the best possible care and customer service by fostering desirable behaviors. Desirable behaviors include, but are not limited to:

- Timely communication
- Communicating in a professional, constructive and respectful manner, to include verbal and non-verbal communication, written documents and emails
- Maintaining an understanding of the variety of experience levels, particularly in a clinical setting, and that tolerance for those who are learning is vital to the mission of the college

D. Obey the Law: There are many laws and regulations that govern the activities of UFCD. UFCD has policies to help explain these requirements. If you are not certain about what the law requires, you should ask for help by consulting with your departmental chair or the Associate Dean/Assistant Dean over each area. For questions more general in nature, you can contact UFCD Human Resources Office.

- 1. Legal and Regulatory Compliance:** All activity by or on behalf of UFCD must be in compliance with all federal, state and local laws and regulation. Examples include, but are not limited to:
 - Prohibition of discrimination and harassment
 - Adherence to health and safety laws

- Environmental protection
 - Regulation of controlled substances
 - Protection of intellectual property and trade secrets
 - Screening for excluded individuals and entities
- 2. Business Ethics:** We are committed to the highest standards of business ethics and integrity, and require honesty and accuracy when representing UFCD. Some examples include but are not limited to:
- Billing
 - Fraud, waste and abuse: false claims, accurate books and accounts, anti-kickback
 - Accountability for proper filing for and use of intra/extramural funding
 - Business courtesies
 - Antitrust
 - Advertising and Marketing
 - Travel and entertainment
- 3. Conflict of Interest:** Employees owe a duty of unqualified loyalty to UFCD and may not use their positions to profit personally at the expense of the organization. All faculty and staff should exercise good faith and use their best skills and judgment in the administration of their duties. In dealing with and on behalf of any UFCD entity, all faculty and staff are required to act honestly, fairly, and impartially, and should not use their position, or any knowledge gained as a result of their connection to UFCD, in such a manner to create a conflict of interest or give rise to the appearance of impropriety. Some examples include but are not limited to:
- Outside activities and employment
 - Scholarly activity (grants, authorship etc.)
 - Family and work
 - Political activity
 - Insider trading
- 4. Appropriate use of Resources:** Employees must preserve and protect the organization's assets by making appropriate and effective use of resources. Theft, carelessness and waste have a direct impact on the organization's success. Employees are responsible to take measures to prevent damage to, and theft or misuse of UFCD property. Some examples include but are not limited to:
- Personal use of property
 - Accounting of proper use of resources (intra/extramural funding etc.)
- 5. Confidentiality:** Employees are obligated to maintain the confidentiality of patient, personnel, research and other sensitive information. UFCD strives to maintain the trust and confidence of patients, employees, and those who enter into business or professional relationships with UFCD. Accordingly, employees are trusted with a

wide spectrum of confidential information. This confidential information is and remains the sole property of UFCD. Upon accepting employment with UFCD or during the course of your employment, you may have been asked to sign a confidentiality agreement, which states that you will not disclose or use any confidential information, either during or after your employment with UFCD. You are required to be familiar with, and abide by, the terms of the confidentiality agreement. Some examples include but are not limited to:

- Patient privacy (HIPAA etc.)
- Student privacy (FERPA etc.)
- Research privacy (RCR etc.)
- Employee privacy
- Communication with the public

6. Active Participation – Reporting and Training: UFCD will provide continued training for Code of Conduct policies and procedures. Employees are expected to report all known or suspected abuses and may do so confidentially. You should first report such issues to your direct supervisor or appropriate authority. If no action is taken, you are expected to make a report to the next level of administration/oversight depending on the parties involved and the severity of the issue. UFCD forbids retaliation against any person raising a concern in good faith. Any person found to have retaliated against an individual for raising a concern is subject to disciplinary action. Reports may also be made anonymously via the hotline; however, it is expected that, absent extraordinary circumstances, faculty or administrators who have been given responsibility for ensuring compliance in an area will perform their duties and not attempt to anonymously “delegate” those duties to other offices. Reporting disruptive or inappropriate behavior should include a factual and objective description of the situation, the date/time of the incident and individuals present during the incident.

I acknowledge:

1. That UFCD upholds and supports proper compliance conduct.
2. That I have received, reviewed and will abide by the UFCD Code of Conduct.
3. That I may report potential compliance issues.
4. That violations of the Code of Conduct may result in disciplinary action.

Employee Name: _____ UFID: _____

Employee Signature: _____ Date: _____

References

[HIPAA](#)

[FERPA](#)

[NIH RCR Guidelines](#)

[UFCD Attendance Policy](#)

[Harassment Policy](#)

[Regulations](#)

[Outside Activities](#)

[Confidentiality Statement](#)

Contact Information

Policy Contacts:

Amanda Phelps, Director of Human Resources

aphelps@dental.ufl.edu

Confidential/Anonymous Hotline Service:

<http://www.compliance.ufl.edu/Reporting/methods.html#Hotline>

UFCD's Human Resources Office will track the annual signature requirement, reminding employees when an updated signature is required. The Code of Conduct, with original or online signature, will be maintained in the college's human resources office.

Important Dates

- Original Effective Date: September 27, 2007, Approver: Dr. Teresa A. Dolan, Dean
- Revised September 23, 2011 , Approver: Dr. Teresa A. Dolan, Dean
- Revised January 2018, Approver: Dr. A. Isabel Garcia, Dean
- Reviewed December 2019, Approver: Dr. A. Isabel Garcia, Dean