



# Doing the Right Thing Right

University of Providence Code of Conduct

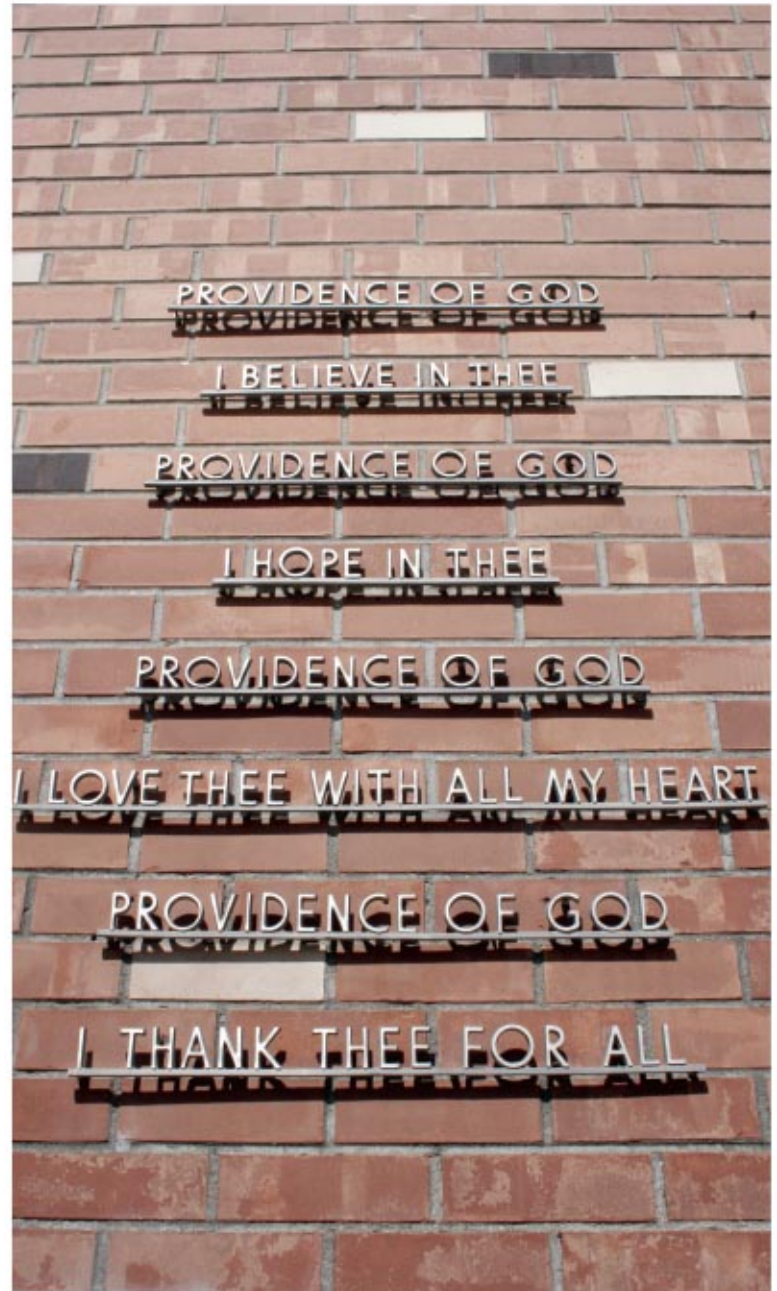


UNIVERSITY OF  
PROVIDENCE

A Private, Catholic, Liberal Arts University

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## MESSAGE FROM ANTHONY ARETZ, PH.D.

President of the University of Providence

Dear colleague,

The people we serve at work place an enormous amount of trust in us. Our Code of Conduct provides important guidance for how we should serve others. It represents our core values in action.

The Sisters of Providence set our ministry on a clear path as they served everyone in the community, especially the poor and vulnerable, with grace, compassion and integrity. We will thrive if we continue their legacy of doing the right thing right.

Maintaining the integrity of the heritage and tradition of our ministry is the responsibility of each of us, and that is the purpose of our compliance program. It ensures we are following the basic ethical commitments, laws, rules and regulations that govern our business conduct, and it helps to discourage, prevent and identify violations.

Our Code of Conduct explains the expectations we have of our employees and the critical importance of being both honest and just in all of our interactions with our students, colleagues and vendors. It also details how to report a violation or concern about potential illegal or inappropriate actions.

Please review this Code of Conduct thoroughly and discuss any questions you may have about these standards with your supervisor. Every one of us is expected to take an active role in maintaining the integrity of our University.

I would like to make a final comment before closing. In my view, a code of conduct is an essential but minimum standard for ethical behavior based on compliance. As a Catholic institution, we have a higher standard that strives for a culture of integrity and virtue. Rules alone cannot define human excellence. They are necessary but not sufficient guidance for living a moral life. Our Catholic mission points us to a higher standard that I hope everyone in the University of Providence community can embrace and model for our students so they strive for the same virtues.

Thank you for your participation and your commitment.

Anthony Aretz, Ph.D.  
President of the University of Providence

## UNIVERSITY OF PROVIDENCE MISSION

As an expression of the teaching Mission of Jesus Christ, the Mission of the University of Providence is to provide students with the opportunity to obtain a liberal education for living and for making a living.

The University of Providence was founded through the collaborative efforts of the Sisters of Providence, the Ursuline Sisters, the Catholic Bishop of Great Falls and the civic community, all of whom recognized societal need for higher education. Its educational mission, sponsored by the Sisters of Providence, continues to be the shared endeavor of dedicated people.

The University cooperates with both private and public institutions to attain goals consistent with its educational purpose and values.

The University continually and responsibly evaluates its operation and programs. It develops professional and career programs and continuing education courses designed in view of society's present and future needs, as well as traditional academic degrees in appropriate fields.

The University offers students a foundation for actively implementing Gospel values and the teaching of Jesus within the Catholic tradition; it serves students of all beliefs who wish to take advantage of its programs.

The faculty and staff of the University join with students in a cooperative and enthusiastic search for truth, so that students may develop:

**Character** - have a positive effect on the world and the communities in which they live and work, particularly by recognizing and accepting personal accountability to themselves, to society and to God;

**Competence** - further their ability to live full and rewarding lives by becoming competent working members of society who know the basics of their professional field and have access to future learning; and

**Commitment** - find meaning in life which enables them to participate effectively in society while transcending its limitations, by living according to their own moral and religious convictions, as well as by respecting the dignity and beliefs of other people.

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### UNIVERSITY OF PROVIDENCE REPORTING OPTIONS:

- 1 Contact Your Immediate Supervisor
- 2 Department Manager
- 3 Risk and Integrity Services Compliance Staff
- 4 Call the 24/7 Integrity Hotline at 888-294-8455
- 5 [www.integrityonline.ethicspoint.com](http://www.integrityonline.ethicspoint.com)

## WHY WE HAVE A CODE OF CONDUCT

At the University of Providence, we are committed to “doing the right thing right” and conducting ourselves with the utmost integrity. The success of the University and the continuing heritage of the Sisters of Providence depend on us building honest and trusting relationships with our fellow employees, students, business partners, regulators and the communities we serve. To achieve our Mission and vision, we commit to conducting all business activities in an honest, fair and ethical manner.

The University of Providence's commitment to integrity is a vital part of who we are as a Catholic education ministry.

In today's operating environment, the rules that govern business practices are more demanding than ever before and require us to keep integrity at the core of all we do in advancing our Mission. It requires a commitment from each of us to conduct our business honestly and ethically, regardless of the situation.

The University of Providence Code of Conduct provides us with a set of standards that guides our decision-making and our commitment to “doing the right thing right.” This means conducting our business within appropriate ethical, legal and regulatory standards, and complying with the University's policies and standards.

In addition to the Code of Conduct, there are institutional policies, procedures and standards that may apply to your work. Copies of these can be obtained through the human resources office.

## HOW SHOULD I USE THE CODE OF CONDUCT?

The University's Code of Conduct asks you to reflect on our Mission as you apply ethical and legal standards to your work. Our Code of Conduct helps you answer these questions:

- Are my actions and decisions consistent with the University's Mission?
- Am I supporting the spirit, as well as the letter, of laws, regulations, policies or standards?
- Can I explain my actions or decisions without embarrassment to family, friends, co-workers or students?
- Would my behavior harm the University's reputation in the community or as a ministry focused on education?
- Whom should I contact if I believe a violation has occurred?
- What do I do if retaliation occurs when I raise a concern?
- Whom should I contact if I still have questions?
- How do I contact compliance staff from Providence St. Joseph Health Risk and Integrity Services?

## WHERE CAN I FIND MORE INFORMATION ABOUT THE POLICIES DISCUSSED IN THE CODE OF CONDUCT?

This document gives an overview of the policies of the University of Providence. Policies are living documents that are frequently reviewed and updated. Please contact the human resources office for the latest version of a policy. The complete version of the policy will provide you with more details about what is expected of you and how a policy is implemented on campus.

# INTEGRITY AND COMPLIANCE

We communicate openly and we act with integrity.



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## Our Commitment

The University of Providence is committed to acting with integrity in all we do. We require compliance with laws and regulations, this Code of Conduct and University policies and standards. These expectations apply to employees, board members, volunteers and others under the direct control of the University. As a ministry of Providence St. Joseph Health, the University works closely with the Providence St. Joseph Health compliance office.

The Audit and Compliance Committee of the Providence St. Joseph Health Board of Directors provides oversight and direction for the Compliance Program. Providence St. Joseph Health chief compliance officer serves as the University's chief compliance officer.

The University of Providence and the Providence St. Joseph Health compliance office are responsible for the day-to-day direction and implementation of these policies and standards. This includes developing resources (policies, procedures, education programs and communication tools) and providing support (managing the Integrity Hotline and other reporting mechanisms, conducting program assessments and providing advice) to employees and others.

The University's human resources staff members are also highly knowledgeable about many of the employment and workplace compliance-risk areas described in this Code of Conduct. You are encouraged to report any concerns about your work situation to human resources. University professionals are expected to investigate and resolve matters relating to employment and workplace situations.

## Reporting a Concern

The University of Providence expects that integrity, compliance or legal concerns will be reported promptly. Each University employee has a responsibility to report any activity that appears to violate laws, rules, regulations, standards or this Code of Conduct.

If you have a concern that you believe poses a **serious or immediate** legal or compliance risk that can significantly affect accreditation or the University or may lead to a major legal claim, report these concerns either directly to the compliance office or to the University's human resources office. Contact information is listed on the back cover. The safety of our students and employees is of paramount importance to the University, and any safety concerns you have should be reported using any of the options listed below.

1. Discuss the matter or concern with your immediate supervisor.
2. Discuss the matter or concern with the department manager.
3. Contact Risk and Integrity Services compliance staff directly.
4. Call the 24/7 Integrity Hotline at 888-294-8455 or use Integrity Online, our web-based ([www.integrityonline.ethicspoint.com](http://www.integrityonline.ethicspoint.com)) reporting option.

### **You may report concerns anonymously.**

If you have tried any of the first three options without success or you feel uncomfortable contacting these people, call the Integrity Hotline or use Integrity Online.

The Providence St. Joseph Health Integrity Hotline and Integrity Online are answered by a third-party company, which sends all reports to the University's human resources office for investigation. A reporter receives a tracking number to enable him or her to retrieve information about the status of a report.

If you report a concern anonymously, it is important to clearly describe the situation, provide the location and give enough detail so that your concern can be properly investigated and resolved. We may not be able to investigate your concern if you do not provide us with enough factual information.

## Confidentiality of Reports

The University will keep the complaint, investigation and resolution as private and confidential as is reasonable and practical under applicable law. What is reasonable and practical may vary with circumstances. Confidentiality may not be maintained if it could create a significant health or safety risk or could significantly impair the University's ability to conduct a complete investigation.

## Retaliation Will Not Be Tolerated

The University prohibits retaliation against an employee, student, volunteer or independent contractor for reporting a good faith concern or complaint of discrimination, requesting a reasonable accommodation or for assisting in a complaint or accommodating investigation. Anyone who engages in retaliation or harassment directed at the person who raises a good faith concern or assists in the investigation of a concern is subject to disciplinary action in accordance with the University's policy. If after investigating any complaint or request the University determines that the complaint or request is not in good faith or that an employee has provided false information, the University may take disciplinary action, including termination of employment, against the employee who made the complaint, made the request or gave the false information.

If you believe that retaliation or harassment is occurring, report it to human resources, your local or regional compliance representative or to the Integrity Hotline at 888-294-8455.

## Corrective Action

The University expects employees to comply with state and federal law and the University's policies and procedures related to employment, integrity and compliance. Alleged violations will be investigated based upon the facts and circumstances of the violation, and corrective actions will be imposed when necessary. The findings of the investigation and corrective actions applied will be documented according to applicable human resources policies and placed in employment files.

Contact your supervisor or human resources if you have any questions concerning any University policy, practice or condition of employment.



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## WORKING WITH EACH OTHER

We nurture the spiritual, physical and emotional well-being of one another and those we serve.



## General Conduct

Employees must possess a personal philosophy compatible with, and desirous of contributing to, the Catholic university environment. Employees must behave in a manner that promotes good public relations for the University. In all interactions with students, employees are considered mentors and representatives of the University and must conduct themselves appropriately. Employees must exhibit courteous, considerate and professional behavior and language toward students, faculty, visitors, members of the public and other employees. Employees must behave with care and attention to the students' needs and the University's quality standards and requirements. Employees must work in an efficient, economical, confidential and safe manner. Unsatisfactory work performance will result in disciplinary action and possible termination. Employees must maintain professional standards of conduct appropriate to the University's business at all times.

Failure to comply with the University's conduct guidelines or any other guidelines, rules, regulations, policies, procedures or practices of the University, whether in this Code of Conduct or not, may result, at the University's discretion, in disciplinary action being taken, including termination of employment.

## Faculty Conduct

As members of the University, and as part of the Catholic academic community created by the Sisters of Providence, faculty members aspire to the highest standards of ethical behavior. The spirit of the faculty is grounded in the Catholic ethic of love for all persons and in the belief that all individuals have rights and duties. These include exhibiting and encouraging responsible actions, sensitivity and mutual support among all members of the community.

Faculty members must respect the dignity of others, acknowledge each person's right to express differing opinions and foster and defend intellectual honesty. Students are entitled to an atmosphere conducive to learning. All members of the academic community have the right to fair and just treatment in all situations. Faculty members also strive to be objective in professional judgment of colleagues and assist each member to reach his or her full potential as an educator and member of the University community.

## Confidentiality

Employees may not disclose confidential information gleaned from business transactions and must protect confidential relationships between the University and its employees, faculty, students and suppliers. University, employee, faculty, supplier and student information that has not been made public is confidential and an employee may not release confidential information to anyone unless required for a business purpose of the University or by legal process such as a subpoena or court order.

Employees may not use confidential information for private interest or personal gain. No employee may remove University information, confidential or not, from the University's property without permission from the employee's supervisor, except in the ordinary course of performing duties on behalf of the University. These materials include, without limitation, documents, notes, files, records, computer files or similar materials. The University prohibits employees from attempting to obtain and from possessing confidential information for which they have not received access authorization. An employee who is unsure about the confidential nature of specific information or the employee's authority to access or use confidential information must ask his or her supervisor for clarification.

Nothing in this Code of Conduct is intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.

## Discrimination and Harassment/Sexual Harassment

The University of Providence is mindful of its mission to be a witness to the love of Christ for all and admits students of any age, race, color, disability, national or ethnic origin, religion, sexual orientation, sex, gender, citizenship status, status as a veteran, or any other characteristic that is protected by applicable state or federal law to all rights, privileges, programs and activities generally accorded or made available to students at the University.

The University is committed to equal employment opportunity and does not discriminate on the basis of age, race, color, disability, national or ethnic origin, religion, sexual orientation, sex, gender, citizenship status, status as a veteran, or any other characteristic that is protected by applicable state or federal law in its operations, employment opportunities, educational programs and related activities.

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**Sexual Misconduct Policy Statement** - Discrimination or harassment of any kind in regard to a person's sexual orientation or gender is not tolerated by the University of Providence. Discrimination and harassment include sexual misconduct (sexual harassment, non-consensual sexual contact, non-consensual sexual intercourse and sexual exploitation), domestic violence, dating violence, stalking, other forms of sexual violence and sex or gender based harassment. These are considered violations of this policy and will not be tolerated by the University. Furthermore, the University forbids retaliation and/or any form of harassment against an individual as a result of filing a good faith complaint of discrimination or harassment or participating in an investigation of a complaint of discrimination or harassment.

**Sexual harassment** is a form of discrimination and is defined as: (1) unwelcomed conduct, (2) based on a protected class, which (3) either creates a hostile environment or is a condition of working. "Unwelcomed" conduct is verbal or physical behavior that one did not willingly invite or engage in and that one finds unwanted or offensive. Intimidating statements, gestures with sexual overtones, even jokes that others find offensive are forms of harassment if they are based on a person's membership in a protected class.

**Harassment** includes unsolicited remarks, gestures or physical contact, displays or circulation of written materials or pictures derogatory to any protected group (i.e., based on gender, race, ethnicity, religion, sexual orientation, disability, etc.).

**Bullying** is participating in any intentional, disrespectful behavior that causes physical, emotional or social damage through the abuse of power, intimidation or mistreating somebody weaker or in a more vulnerable situation.

If an employee experiences, witnesses or learns of unlawful discrimination at the University, that employee must immediately report it to his or her supervisor. If the discrimination involves the employee's supervisor, the employee must immediately report it to the head of his or her department, to his or her area vice president, to the University president or designee or to the director of human resources or the Integrity Hotline. The University will investigate all complaints of discrimination. The University will keep the complaint, investigation and resolution as private and confidential as is reasonable and practical under the circumstances.

## Workplace Violence

This Code of Conduct confirms the University's commitment to prevent, reduce and manage all acts of violence, while providing a safe environment to work and learn.

The University is committed to providing a safe and secure work environment for all employees, students and visitors. Threats, intimidation, harassment, assault or any acts of aggression are prohibited and violate University policy and may result in disciplinary action, up to and including termination.

"Violence" includes, but is not limited to, actual or potential assault, battery, harassment, intentionally threatening, intimidating, physically injuring, stalking, destruction to person or property, that occurs while using University resources, at a University work location or while engaged in the University's business. The University of Providence does not prohibit an employee from exercising the legal right to defend one's self, another or property.

## Health and Safety

The University complies with government regulations and employees must comply with Mont. Code Ann. § 50-71-203. Policies and practices promote the protection of workplace health and safety, and all employees share a responsibility in understanding how these policies and practices apply to our job responsibilities and for seeking advice when there is a question or concern. Additionally, the University is committed to and responsible for ensuring the health and safety of the students entrusted to its care.

We have an obligation to report any serious workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken to resolve the issue. Employees are required to report injuries.

Weapons of any kind are prohibited on campus whether or not a permit is held. This includes, but is not limited to, knives, guns and explosive devices.

## Reporting an Accident or Injury

Employees must immediately report all work-related injuries to person and property to their supervisors and complete all paperwork requested by the University. Reports must be made as soon as possible to the human resource office. Employees must report all emergencies by calling 9-911 if using the University's phone system and 911 if using other phones.

# WORKING WITH STUDENTS

We set the highest standards for ourselves and for our University.



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## Fraternization with Students

Employees may not offer or request sexual favors or intimacy, make sexual advances, or engage in sexual conduct or intimacy – consensual or otherwise – with a student who is:

- Enrolled in a class taught by the employee;
- Receiving academic advising or mentoring from the employee;
- Working for the employee; or
- Subject to any form of evaluation by the employee.

Other types of fraternization may also violate our policy. An employee must disclose and discuss with the employee's supervisor any relationship with a student that could be perceived as inappropriate.

## Family Educational Rights and Privacy Act (FERPA)

In accordance with the Family Educational Rights and Privacy Act (commonly referred to as FERPA) the University has adopted the following policies and procedures to protect the privacy rights of students.

### Definitions

The University uses the following definitions in our policy.

**Student:** Any person who is enrolled or has attended the University.

**Education records:** Any record maintained by the University which is directly related to a student, with the following exceptions:

1. Personal records kept by University employees that are in the author's sole possession and are not accessible or revealed to any other person.
2. Employment records unless the employment records are contingent on the fact that the employee is a student (i.e., work-study students).
3. Records maintained by the safety and security office solely for law enforcement purposes.
4. Records maintained by the Health Center.
5. Alumni records.

### Inspecting Education Records

A student may inspect and review his or her education records upon request to the appropriate record custodian. The student should submit in writing a request which identifies as precisely as possible the records he/she wishes to inspect. The custodian will make the necessary arrangements for access within 45 days after receipt of the written request and will notify the student of the time and place where the records may be inspected.

### Right of the University to Refuse Access

The University reserves the right to refuse to permit a student to inspect the following records:

1. The financial statement(s) of the student's parents.
2. Letters and statements of recommendation for which the student has waived his or her right of access or which were placed in the file before Jan. 1, 1975.
3. Records connected with an application to attend the University if that application was denied.
4. Education records containing information about more than one student, in which case the University will permit access only to that part of the record which pertains to the inquiring student.
5. Those records which are excluded from the FERPA definition of education records.

### Disclosure of Education Records

The University will disclose information from a student's education records only with the written consent of the student, except:

1. To school officials who have legitimate educational interest in the records.

A school official is:

- a. a person employed by the University in an administrative, supervisory, academic, research or support staff position;
- b. a person elected to the Board of Trustees;
- c. a person employed by or under contract to the University to perform a special task, such as legal counsel or an auditor.

A school official has legitimate educational interest if the official is:

- a. performing a task that is specific in his or her job description or by a contract agreement;
- b. performing a task related to the student's education;
- c. performing a task related to the discipline of a student; or
- d. providing a service or benefit relating to the student or the student's family, such as health care, counseling, job placement or financial aid.

2. To officials of another school, upon request, in which a student seeks to enroll.

3. To certain officials of the U.S. Department of Education, the comptroller general of the United States and state and local educational authorities, in connection with certain state or federally supported education programs.

4. In connection with a student's request for or receipt of financial aid, as needed to assess eligibility, amount or conditions of the financial aid or to enforce the terms and conditions of the aid.

5. If required by a state law requiring disclosure that was adopted before Nov. 19, 1974.

6. To organizations conducting authorized studies for, or on behalf of, the University.

7. To accrediting organizations to carry out their functions.

8. To parents of an eligible student who claim the student as a dependent.

9. To comply with a judicial order or a lawfully issued subpoena.

10. To appropriate parties in a health or safety emergency.

### Records Retention

The University requires that certain records be retained for specific periods of time. The University is responsible for and committed to effective records retention in order to preserve its history, ensure that critical records are available to meet business needs, comply with legal requirements, optimize the use of space, minimize the cost of record retention and ensure outdated and useless records are destroyed. Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements.

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# WORKING WITH COMMUNITY, VENDORS AND OTHER PARTNERS

We strive to transform conditions for a better tomorrow  
while serving the needs of today.



## Entertainment, Gifts, Favors and Gratuities

Accepting gifts, gratuities, favors, rewards and offers of entertainment creates a risk that our judgment and decisions can be influenced. In some cases, acceptance of gifts and entertainment may be considered a violation of federal and or state laws.

Employees may not solicit, accept or give any gift, gratuity, favor, entertainment, reward or any other item of monetary value unless it is of nominal value, is customary in the industry, will not violate any laws and will not influence or appear to influence the employee's or the recipient's judgment or conduct at the University.

### Vendor Interactions

Interaction with vendors shall be conducted so as to avoid or minimize actual, perceived or potential conflicts of interest. Business relationships with vendors can never be based on an implied or expressed understanding that acceptance of gifts or future favors will influence the conduct of University business. When actual, perceived or potential conflicts of interest do arise, they must be addressed in accordance with the University's Conflicts of Interest Policy.

Vendor interactions include but are not limited to the following:

1. Gifts to individuals
2. Gifts to an entity
3. Offers of paid travel to individuals
4. Accepting meals
5. Vendor participation in events
6. Research grants
7. Consulting arrangements (including surveys)
8. Speakers and educational events
9. Purchasing and contracts

## Conflicts of Interest

Employees may not partake in any activity or association that creates or appears to create a conflict between the employee's personal interests and the University's interests. In addition, an employee must not allow any situation or personal interest to interfere with the exercise of the employee's independent judgment or with the employee's ability to act in the best interests of the University. If an employee has any question whether an action or association would violate this policy, the employee must contact the employee's supervisor to obtain advice on the issue.

## Outside Employment

An employee must disclose to his or her supervisor any outside employment and employee must get approval from his or her supervisor before obtaining employment with a competitor of the University. If there is question about whether the employer is a competitor, the employee should discuss with his or her supervisor.

## Financial Interest in Other Business

Employees and their immediate family members may not invest in any of the University's suppliers or competitors unless the form of investment is publicly traded and the investment is on the same terms available to the general public and not based upon any inside information. This prohibition applies to all forms of investments.

## Communications and Media Relations

No employee may act or speak for the University in response to media inquiries or in press releases, publications, speeches or other public declarations without specific authorization from the University.

## Style Guide/Brand Standards

The approved University brand covers all representations that identify the University, including its official titles, logo, trademarks, slogans, business names, seals, mascots and domain names. Use of this brand is protected, covered and must be approved by the University administration as well as Providence St. Joseph Health. Creation of University "other brands," regardless of whether the crest or other traditional University visual identifiers are incorporated, potentially

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detracts from the impact and recognition of the University's approved brand. All use of the brand must follow the guidelines set by the official University Style Guide/Brand Standards.

Branding that introduces a new visual identifier (for example, logo, color or domain name) outside the specifications of the University Brand Standards is not allowed without approval by administration or University of Providence Marketing and Communications as appropriate.

## Acceptable Use of Technology Resources

The use of University information technology resources is subject to the normal requirements of legal and ethical behavior within the University community. Responsible, acceptable use is ethical, reflects academic honesty, is consistent with the University of Providence's Mission and values and those of the sponsoring organization Providence St. Joseph Health and shows community awareness in the consumption of shared resources. Occasional non-commercial personal use of the University's information technology resources is permitted.

When using the University of Providence's information technology resources, users must comply with all federal, Montana and other applicable laws; applicable University rules and policies; and all applicable contracts and licenses. Users must use information technology resources only for lawful purposes and not for any purpose that is illegal, immoral, unethical, dishonest, damaging to the reputation of the University, inconsistent with the Mission and values of the University or likely to subject the University to harm.

Examples include but are not limited to:

- Violating the laws of defamation, privacy, copyright, trademark, obscenity and child pornography;
- Violating the Electronic Communications Privacy Act and the Computer Fraud and Abuse Act, which prohibit "hacking," "cracking" and similar activities;
- Violating published University policies governing student, faculty and staff conduct, including the use of the cyber environment in violation of the University's Sexual Harassment Policy; and
- Misuse of any applicable licenses.

Uses of information technology resources are not private. The normal operation and maintenance of the University's technology resources require backup and caching of data and communications, logging of activity, monitoring of general use patterns and other such activities that are necessary to provide security.

The University reserves the right to inspect any activities or accounts of individual users of University information technology resources, including individual login sessions and communications, without notice, unless otherwise prohibited by law. The University may inspect such information technology resources under circumstances when the University determines inspection is necessary, including but not limited to the following:

- To protect the integrity, security or functionality of University or other information technology resources or to protect the University from harm;
- There is reasonable cause to believe the user has violated or is violating, any University policy or applicable civil or criminal law; or
- An information technology resource appears to be engaged in unusual or unusually excessive activity, as indicated by monitoring of general activity and usage patterns.

## Social Media

The University of Providence uses social media to communicate its Mission and culture through the sharing of relevant and timely content while engaging in conversations with key audiences, including prospective and current students, parents, alumni, friends and donors. The University recognizes that social media and other forms of electronic communication can be effective tools for doing one's job and supporting the University's interests. When communicating about the University or matters that affect the University, its students, faculty, staff and/or alumni, all employees are expected to follow this Code of Conduct and all University policies even when using social media outside of work or when using personal social media accounts in which employees indicate their affiliation with the University of Providence. New social media accounts representing any aspect of the University must be approved by administration or University of Providence Marketing and Communications as appropriate.

## Intellectual Property

The University of Providence desires to create an intellectual environment whereby creative efforts and innovations are encouraged; it still retains reasonable access to, and use of, intellectual property, in the creation of which the University has provided assistance. University personnel are covered to the extent their intellectual property involves the use of University resources such as space, facilities, equipment, staff or funds, as stipulated for the particular circumstances.



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- 3 Risk and Integrity Services Compliance Staff
- 4 Call the 24/7 Integrity Hotline at 888-294-8455
- 5 [www.integrityonline.ethicspoint.com](http://www.integrityonline.ethicspoint.com)

# GLOSSARY OF TERMS

<b>compliance</b>	Acting in accordance with accepted standards and policies, including laws, rules and regulations.
<b>confidentiality</b>	A set of rules or a promise that limits access or places restrictions on certain types of information. Example: medical information about a student or financial information about the University.
<b>conflict of interest</b>	A situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult to fulfill his or her duties impartially. Even if there is no evidence of improper actions, a conflict of interest can create an appearance of impropriety that can undermine confidence in the ability of that person to act properly in his or her position. Example: a purchasing department employee ordering supplies from his brother's business.
<b>employee</b>	Anyone employed by the University.
<b>ethical behavior</b>	Doing what is right; acting on the basis of University of Providence's Mission, and acting with integrity and setting the highest standards for ourselves and for our ministry.
<b>fraud and abuse</b>	<p>Fraud is distinguished from abuse in that, in the case of fraudulent acts, there is clear evidence that the acts were committed knowingly, willfully and intentionally or with reckless disregard.</p> <p>Abuse is engaging in a practice or activity that is not part of generally accepted, sound industry standards that may result in unnecessary costs or the receipt of an improper payment.</p>
<b>integrity</b>	Honesty in words and actions.
<b>regulations</b>	Rules enacted by a government agency that must be followed by those organizations or businesses providing the services covered by the rules.
<b>retaliation</b>	Any action that negatively affects a workforce member because he or she raised a concern or assisted in the investigation of a concern.
<b>standards and policies</b>	Requirements for expected behaviors or actions by Providence St. Joseph Health workforce members.
<b>system integrity compliance program</b>	A department within Risk and Integrity Services responsible for establishing and monitoring the effectiveness of Providence St. Joseph Health's compliance program.
<b>university</b>	The University of Providence and any company wholly owned by it.

## FOR MORE INFORMATION

### UNIVERSITY OF PROVIDENCE

Human Resources Office: [hr.up@uprovidence.edu](mailto:hr.up@uprovidence.edu)

Information Services Desk: 406-791-5326

Website: [www.uprovidence.edu](http://www.uprovidence.edu)

### PROVIDENCE ST. JOSEPH HEALTH

Risk and Integrity Service's Compliance Office: 425-525-3705

Department of Legal Affairs: 206-233-7338

INTEGRITY HOTLINE: 888-294-8455 (toll free)

INTEGRITY ONLINE: [www.integrityonline.ethicspoint.com](http://www.integrityonline.ethicspoint.com)



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