

106.2 Risk – Ethics – Compliance – Code of Conduct

I. Purposes and Goals

The Board of Trustees of The University of Alabama is committed to the highest standards in all aspects of its operations. In adopting this rule, the Board:

- Endorses an organizational culture that encourages effective consideration and management of risks, including risks related to violations of law, regulations, conflict of interest and ethics standards; and
- Promotes ethical conduct, and the appearance of ethical conduct, both among the members of the Board, senior staff, and other members of our University community, including faculty, staff, students, volunteers, contractors, agents, affiliates, and others providing services to or on our behalf (hereinafter “University community members”).

University community members should exercise good judgment and wise discretion to conduct all activities of the System and its institutions ethically and in compliance with applicable law; protect the institutions from unnecessary risks; and preserve and enhance the assets and reputation of the institutions for the education and betterment of current and future generations.

II. System Risk Program

The Chancellor will staff a System office to address risk, including risks related to compliance with laws and ethical standards. The office will be responsible to develop, implement, evaluate, and monitor a System-wide risk program; promote collaboration among campus/entity-based risk, ethics, and compliance programs; assist and support campus/entity-based programs; promote a culture that supports Board goals; support training and educational efforts related to the above goals; provide advice and counsel for these purposes; refer appropriate investigatory matters to the General Counsel, General Auditor, and/or others; encourage the flow of information and internal transparency related to Board goals, including appropriate reporting and direct access to the Board, its Committee(s), the Chancellor, and appropriate administrators; and perform such other duties as directed by the Chancellor in consultation with the Board.

III. System Risk Committee

The Chancellor, in coordination with the President pro tempore of the Board, may form a council or committee to assist with the purposes and goals of this rule.

IV. Campus and Health System Risk Programs

The campus Presidents and Health System CEO shall be responsible for strengthening the organizational culture of his/her institution to encourage full consideration of risks and ethical compliance with legal obligations. Each campus and the Health System shall appoint an officer or officers who shall have day-to-day operational responsibility for risk, ethics, and compliance programs, including a designee to act as liaison to the System program. The designee shall have direct and regular access to the President/CEO and provide appropriate reporting to the President/CEO related to these efforts. Campuses may also create committees to assist with such purposes. The System, campuses, and Health System shall seek to share resources (subject matter experts, training, etc.) and best practices to facilitate risk management and ethical compliance among System institutions.

V. Requirements for Prompt Reporting

Campus officers, including the designee to the System program, should promptly report to the President/CEO when he/she learns of any significant occurrence or threat which has caused or poses an imminent risk of substantial injury or harm to persons, property or the surrounding community, or substantial reputational harm to the System or its institutions. The Presidents/CEO should promptly inform the Chancellor, who can appropriately relay such information to the Board or its members. Such reports may be conveyed in accordance with applicable legal privileges.

VI. System Code of Conduct

The Presidents/CEO shall adopt appropriate policies, codes, or rules for University community members. Such campus/entity codes shall, at a minimum, impose standards consistent with the following. The standards below will bind those who are not subject to more specific campus or enterprise codes, in both letter and spirit. This code is general and aspirational in nature, and not intended as a mere set of detailed rules, regulations, or a checklist. These standards should be reasonably interpreted and applied in accordance with good judgment and discretion.

1. Provide quality education, research, healthcare, business interactions, and other services.

The Board expects ethical and professional conduct, honesty, conscientious behavior, appropriate awareness of responsibilities, and personal accountability.

2. Treat individuals with respect.

The Board expects tolerance, diversity, respect, fairness, and equal opportunity for our community. University community members should avoid illegal harassment, discrimination, threats, and violence.

3. Comply with applicable laws, regulations, and policies.
University community members should learn and follow governing rules, be proactive to prevent and detect violations, properly report suspected violations, and act to ensure proper resolution of issues and conflicts related to the same.
4. Use confidential information responsibly.
University community members should be wise custodians of confidential, proprietary, and private information.
5. Acknowledge and appropriately manage conflicts of interest.
University community members should be loyal to our missions and institutions, appropriately objective and impartial in exercising their duties and discretion, and follow applicable ethical standards. University community members must not use public offices or resources for private or other improper gain, or otherwise act under an improper conflict-of-interest related to their duties.
6. Safeguard and accurately account for resources.
The Board expects University community members to be responsible stewards of, and appropriately account for, resources, including property, equipment, finances, material, electronic and other systems. University community members should prevent waste and abuse, adopt and follow appropriate protocols, exhibit sound practices, and seek efficiency in operations.
7. Promote a safe environment.
University community members should promote personal safety, good practices, and security.
8. Document, code, bill, and collect in accordance with applicable rules and regulations.
Compliance with law and regulations is a priority in all operations. Recordkeeping should be in accordance with such goals.

University community members should report suspected violations, in accordance with appropriate rules and procedures, and cooperate with appropriate investigations. A “hotline” for reporting purposes shall be maintained as part of the System program. This Board expects appropriate consideration and investigation of reports. Retaliation shall not take place for good faith reports. Appropriate consequences, up to and including termination, expulsion, or other sanctions, should flow from violations of these standards.

(Adopted November 7, 2014.)