



Statement of Ethical Conduct

Administrative Code of Conduct

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Columbia University expects all officers of instruction, research, libraries, athletics, and administration; support staff; and students to maintain the highest standards of ethical conduct.

Columbia University is one of the world's most important centers of research and at the same time a distinctive and distinguished learning environment for undergraduate and graduate students in many scholarly and professional fields. The University recognizes the importance of its location in New York City and seeks to link its research and teaching to the vast resources of a great metropolis. It seeks to attract a diverse and international faculty and student body, to support research and teaching on global issues, and to create academic relationships with many countries and regions. It expects all areas of the University to advance knowledge and learning at the highest level and to convey the products of its efforts to the world. That commitment upholds the reputation of the University, both locally and globally, and encourages compliance with applicable laws and regulations.

Principles

The basic principles of Ethical Conduct are:

1. Be honest, ethical and truthful.
2. Obey the law. If you are uncertain about what the law or applicable regulations require, seek assistance from your supervisor.
3. Follow University policies and procedures. Make sure you understand your responsibilities. If you have questions about specific issues, you should ask your supervisor. Select University policies and additional resources are listed in the “Where should I go with a concern?” and “To learn more” sections at the end of this document.

Procedures

1. Report conduct that concerns you. If you believe that an activity may be illegal, unethical or otherwise troubling, you should report it to your supervisor. If your supervisor is involved in the questioned conduct, you should discuss it with the person at the next supervisory level. You could also discuss your concerns with another responsible administrative officer, an ombuds officer, or report the conduct to the Compliance Hotline at 866-627-3768. The University prohibits retaliation against individuals who report or seek guidance on possible ethical or compliance issues in good faith. The full Non-Retaliation Policy can be found at policylibrary.columbia.edu.
2. An individual's failure to live up to these principles may result in disciplinary action, including suspension, termination, and monetary fines consistent with University policy. For violations of applicable laws, individuals may also face criminal and civil penalties, including monetary penalties.

Additional Administrative Policies

Additional and more detailed and explicit policies may govern particular areas of administration such as human resources, finance, information technology or facilities. It is the responsibility of each person working in those areas to learn and adhere to those policies.

The Statement of Ethical Conduct and the Administrative Code of Conduct are not an express or implied contract of employment or a guarantee of future employment. They do not provide any additional rights to any colleague, client, supplier, competitor, trustee, or any other person or entity. The University may modify or amend these documents from time to time within its sole discretion.

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Statement of Purpose

Columbia University is a world-class university dedicated to teaching, research, and clinical care. In addition to all of the students and faculty who compose the Columbia community, thousands of staff members are also members of that community. Columbia is not only a place where students, faculty, researchers and clinicians come to do their best work, but also a place where thousands of staff members come to do their best work to advance the various missions of the University.

It is therefore essential to promote an environment that allows everyone who is a part of the Columbia community to do his or her best work, be respected, and have as positive an experience as possible at the University. These expectations are in alignment with the University's high ethical standards and with its goal to continually improve, maintain its status as a world-class university and be an employer of choice.

This policy has been developed to promote the environment of respect that is central to the success of the University and the individuals who work here. The policy articulates the principles that govern interactions at the University and some of the basic expectations that flow from those principles. There are a number of policies that cover specific interactions and situations. This policy does not replace those policies; it provides a framework for them. While this policy does articulate a basic set of expectations and provides examples to articulate some of these expectations, neither is meant to be comprehensive.

Who Is Governed by this Policy

As a statement of principles based on the values of the University, this document can certainly provide sound advice and direction for all interactions between all members of the Columbia community. As a University policy, it specifically applies to Officers of Administration, people applying to the University to be Officers of Administration, and vendors working on behalf of Officers of Administration.

The guiding principle in this document is respect, and the primary goal is the promotion of a positive working environment. Both of these are community values and, therefore are the responsibility of everyone. Regardless of the role someone plays at the University or the level he or she has in an organizational hierarchy, each person has a responsibility to adhere to these principles and promote a positive working environment. Whether someone

is working full time, part time, on a temporary basis or as a contractor working on campus for part of a day, each person is expected to adhere to these values and promote a positive working environment.

Statement of Principles to Guide and Govern Interactions

There are four basic principles that guide and govern interactions at the University and promote a positive working environment: respect for governance; respect for others; respect for information; respect for property.

Respect for Governance

Respect for governance is the expectation that members of the Columbia community will act in compliance with the laws, regulations and policies that are in effect and govern behavior at the University and the conduct of University business.

Whether physically on campus or conducting University business, members of the University administration are expected to comply with all city, state and federal laws. When members of the University administration are in another country on University business, they are also expected to act in compliance with all relevant laws.

Columbia University conducts a significant amount of research that is funded by government agencies and private foundations. As a result, a number of rules and regulations govern activities—both for people working directly under grants and contracts and, often, for everyone conducting research and research-related activities. Members of the University administration are expected to act in accordance with these rules and regulations to maintain the highest standards of compliance and fulfill their roles as stewards of these important relationships and resources.

Columbia University is a nonprofit institution and is therefore also subject to federal and state rules that govern nonprofit institutions. The University's status as a tax exempt organization is central to its mission and financial well-being. Members of the University administration are expected to comply with all rules and regulations pertaining to nonprofit organizations that apply to the University and to act as stewards of the trust entailed in the nonprofit designation.

There are a significant number of laws, regulations, and policies that govern business at the University. Members of the University administration are expected to become familiar with these laws, regulations and policies and are also expected to seek out clarifications when they are not certain about the presence of a governing law, regulation or policy, or have a question about one or more of them.

A respect for governance guides one's own behavior. It is also essential for a community and for a positive working environment. It is, therefore, the responsibility of everyone not to tolerate disregard for and noncompliance with laws, regulations, and policies. Members of the University administration are expected to seek clarifications about possible noncompliance and to report actual and possible violations of laws, regulations and policies. The University has set up a number of mechanisms for inquiry and reporting, is committed to protecting confidentiality, and prohibits any form of retribution against people for reporting violations in good faith.

At the end of this document is a list of referrals and policies that can help people understand the resources at their disposal.

Respect for Others

Respect for others is the central principle that governs interactions between people at Columbia University. Two primary expectations that flow from this principle are to act with civility and to refrain from abuse of power. Respect for others is expected in peer-to-peer relationships, between service providers and people within and outside of the Columbia community, between people who are clients or customers and service providers at the University, and within a supervisory context (e.g., manager-to-employee and employee-to-manager).

Respect extends to those people who are contractors doing work on behalf of the University. Respect also extends to the University's neighbors in interactions that members of the University community have with Columbia's neighbors.

Respect should be present in verbal and written communications. Respect should be shown at meetings, on the telephone and in electronic exchanges.

People have the right to disagree, even strongly disagree; however, there is also a responsibility to be civil and to maintain respect even while disagreeing. Problems, mistakes, and miscommunications can all arise from time to time in the course of business, and could even call for the escalation of seriousness of attention to a situation. Again, there still remains the expectation of respect and civility in interactions.

Respect for others includes a respect for those who are different from you. A positive working environment where everyone can receive respect and do their best work requires a respect and tolerance for difference and diversity.

Respect for Information

Officers of Administration, by the nature of their positions and responsibilities, often have access to information that is confidential, sensitive, and/or personal. In addition to adhering to the rules and regulations that govern the proper handling of information, everyone is expected to respect the privacy of others by respecting the information that pertains to others.

Business at the University can involve sensitive matters, livelihoods, professional reputations and, of course, the reputation of the University itself. People are expected to manage their access to information responsibly and in a manner that respects all of these things. People also are expected to seek clarification and confirmation of information that comes to them, particularly if it seems inconsistent or questionable, so as not to misrepresent a situation or contribute to a misrepresentation or misunderstanding.

Respect for Property

Officers of Administration act as stewards of University property. Property includes physical assets, intellectual property, the University name, and other resources. As a nonprofit organization, largely supported by gifts, donations, government and foundation grants, it is essential to maintain the highest standards of stewardship for the property and resources entrusted to us. Respect for property therefore entails both the efficient and appropriate use of University assets and resources. Members of the University administration are expected to do nothing that would jeopardize the University's reputation or standing with donors, grantors, or the many people who provide hard-earned resources to the University in order to educate members of their family or themselves.

Where should I go with a concern?

The first recommended resource for a clarification on a policy, regulation or law is your direct supervisor. If a direct supervisor cannot serve as a resource, below are other suggested resources to assist you.

Resource	Description
Your Supervisor	The first recommended resource for a clarification on a policy, regulation or law is your direct supervisor. If a direct supervisor cannot serve as a resource, below are other suggested resources to assist you.
Human Resources Morningside: 212-851-2888 Medical Center: 212-305-3819 https://humanresources.columbia.edu/	Human Resources provides guidance and support for staff on policies that govern employment at the University. Faculty and officers of research should refer to the Faculty Handbook or the Office of Faculty Affairs for policies relating to their appointments at the University.
Compliance Hotline 866-627-3768 https://compliance.columbia.edu/	The Compliance Hotline is a channel for employees to report or seek guidance on potential wrongdoing with the option to report anonymously. The University prohibits retaliation against individuals who report or seek guidance on possible ethical or compliance issues in good faith. For more information about the hotline and/or to file a report online, please refer to the University Compliance website or call the hotline directly. The full Non-Retaliation Policy can be found at policyclibrary.columbia.edu .
Office for Billing Compliance 866-627-3768 (Hotline) 212-305-3842 (Office) https://www.compliance.cumc.columbia.edu/	The Office for Billing Compliance is responsible for the Medical Center's Billing Compliance program and policies. The hotline is a confidential 24-hour hotline for Medical Center patients, providers or staff to report billing concerns or related problems to the Office for Billing Compliance.
Office of HIPAA Compliance 212-305-7315 hipaa@cumc.columbia.edu https://www.hipaa.cumc.columbia.edu/	The office is responsible for ensuring compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The University must follow all regulations stipulated by the HIPAA legislation as well as other federal and state privacy and information security laws. The website provides policies, forms, regulations, and comprehensive guidance related to patient privacy.
Research Compliance and Training 212-851-2897 https://research.columbia.edu/office-research-compliance-and-training	The Office of Research Compliance and Training provides support for Columbia faculty and staff to help ensure compliance with the complex web of regulatory requirements that govern research and to develop programming that promotes understanding of compliance issues.
Office of the General Counsel 212-854-4974 http://ogc.columbia.edu/	The Office of the General Counsel is responsible for providing a full range of legal services to the University. OGC attorneys work in a variety of practice areas on campus. Some areas in which OGC attorneys can provide legal advice are: labor and employment, business matters, contract review, litigation, environmental, copyright, property acquisitions, student and faculty issues, entity tax, among others.

Resource	Description
<p>University Ombuds Morningside: 212-854-1234 CUMC: 212-304-7026 http://ombuds.columbia.edu</p>	<p>The Ombuds Office is a confidential resource for any member of the Columbia community to discuss and to generate options for resolution of workplace issues, interpersonal conflict, academic concerns, bureaucratic problems, and many other issues. The Ombuds office offers in-person and phone appointments.</p>
<p>Office of Faculty Affairs (Morningside) 212-854-2254 https://provost.columbia.edu/content/office-vice-provost-faculty-affairs</p>	<p>The office is responsible for administering the University’s policies and processes governing academic appointments and the statutory provisions governing faculty service, including the approval of all academic appointments on the Morningside campus; managing the University’s system of tenure reviews; working with the University Senate, maintaining fair processes in handling grievances from academic officers; assisting with the development of programs that help faculty members advance their careers; and the collection and analysis of data to assess the effectiveness of programs for faculty, officers of research, and student officers, and for identifying and exploring issues of importance to the University.</p>
<p>Office of Faculty Affairs (CUMC) 212-305-5390 https://www.ps.columbia.edu/administration/academic-affairs/faculty-affairs</p>	<p>Faculty Affairs at CUMC provides support both for faculty and departmental administrators in administrative processes and policies for officers of instruction and of research (including post-doctoral fellows) and student officers.</p>
<p>Public Safety Morningside: 212-854-5555 Medical Center: 212-305-7979 https://publicsafety.columbia.edu/</p>	<p>Any threat against persons or property should be directed immediately to Public Safety.</p>
<p>Discrimination, Harassment & Gender-Based Misconduct <i>Complaints Regarding Faculty, Staff and Third-Parties:</i> Office of Equal Opportunity and Affirmative Action: 212-854-5511 http://eoaa.columbia.edu <i>Student Complaints:</i> Student Conduct and Community Standards: 212-854-1717 http://studentconduct.columbia.edu http://sexualrespect.columbia.edu</p>	<p>Complaints against Columbia staff, faculty and third parties connected to the University, for discrimination, discriminatory harassment and/or gender-based misconduct, including sexual assault, sexual harassment, gender-based harassment, stalking, domestic violence, dating violence and sexual exploitation are processed through the Office of Equal Opportunity and Affirmative Action.</p> <p>Complaints against students for gender-based misconduct, including sexual assault, sexual harassment, gender-based harassment, stalking, domestic violence, dating violence and sexual exploitation, are processed through Student Conduct and Community Standards. This policy covers students who attend Teachers College and Columbia University.</p>
<p>Protection of Minors 212-851-9636 <pomtraining@columbia.edu </pomtraining@columbia.edu https://compliance.columbia.edu/content/protection-minors</p>	<p>The Protection of Minors website contains the University policy, contact information for more information about training, and suggestions for best practices.</p>
<p>Office of Athletics Compliance 212-854-8666 https://gocolumbialions.com/ Go to the Athletics Homepage, About Us on the top banner, navigate below to Inside Athletics and select Compliance</p>	<p>The Athletics website serves as an informational resource for all constituents of Columbia University Athletics—including its prospective and current student-athletes, coaches, faculty and staff, alumni, donors, boosters and friends—to ensure the Department and University remain in full compliance with NCAA and Ivy League rules and regulations.</p>

To learn more

A number of resources are available regarding policies, laws, and regulations that govern the University. Each school has additional policies available through their bulletins and Student Affairs offices.

Resource	Description
Administrative Policy Library http://policylibrary.columbia.edu/	The Administrative Policy Library provides easy access to administrative policies at the University and includes search capabilities and contact information.
Essential Policies for the Columbia Community www.essential-policies.columbia.edu	The Essential Policies website contains valuable information to help students, faculty and staff understand the policies and regulations of the University.
Human Resources Policy Manual http://hr.columbia.edu/policies/hr-manual	This manual sets forth personnel policy guidelines to assist managers and supervisors with their operational responsibilities.
Office of the Provost https://provost.columbia.edu/	The Office of the Provost website includes copyright policy, Equal Opportunity and Affirmative Action policy, information for faculty, officers of research, and officers of the libraries about additional compensation, housing, and tenure-related policy, rules of University conduct, grievance procedures for students, and reports of interest to academic personnel as well as facts about the University.
Office of the Vice Provost for Academic Programs Morningside: 212-854-7165 http://academicprograms.columbia.edu	The website for this office describes policies and procedures for internal and external approval of the University's academic programs, educational partnerships with U.S. and foreign universities and organizations, and University accreditation.
Faculty Handbook www.columbia.edu/cu/vpaa/handbook	The Faculty Handbook provides essential information about the organization and governance of the University; the appointment of faculty, officers of research, and student officers; and the obligations and responsibilities of academic personnel. It also describes the way visitors to the University may be accommodated and the resources and services available to academic personnel.
Finance Gateway http://finance.columbia.edu	The Finance Gateway provides access to all Finance Division departments as well as any related policies, forms, contact information, systems help, and announcements.
Global Support http://finance.columbia.edu/departments/global-support	The Global Support website provides a central point of access for information, guidance and resources to help facilitate international activities, travel or program administration.

Resource	Description
<p>Information Technology Policies https://cuit.columbia.edu/columbia-it-policies-strategies</p> <p>Security Awareness Training https://cuit.columbia.edu/ciso/security-training</p>	<p>To protect the University’s computer systems, networks, data and other information resources, the University has published IT policies. All users of Columbia facilities are required to adhere to Columbia policies. To help you understand Columbia University IT policies and to protect data and computer systems while strengthening security awareness, the University has launched the Security Awareness training. We strongly advise that all students, faculty and staff complete the Security Awareness training.</p>
<p>Office of the Executive Vice President for Research https://research.columbia.edu/</p>	<p>This site provides various resources for the research community, including links to research offices, relevant University policies and government guidelines and educational and training resources.</p>
<p>Sponsored Projects Handbook https://research.columbia.edu/content/research-policies-and-handbooks</p>	<p>This Handbook gives practical guidance to faculty and staff in the management of sponsored projects funded by both governmental and private organizations.</p>
<p>Selected Research Policies https://research.columbia.edu/content/research-policies-and-handbooks</p>	<p>The Selected Research Policies website highlights certain policies that are often referred to by faculty and staff involved in research.</p>
<p>Clinical Research Handbook https://research.columbia.edu/content/research-policies-and-handbooks</p>	<p>This Handbook gives practical guidance to faculty and staff in the management of clinical research.</p>
<p>Animal Research Handbook https://research.columbia.edu/content/research-policies-and-handbooks</p>	<p>This Handbook gives practical guidance to faculty and staff in the management of animal-based research.</p>
<p>Environmental Health & Safety https://research.columbia.edu/content/environmental-health-safety</p>	<p>The Environmental Health & Safety website provides details on various health and safety policies.</p>
<p>Disability Services https://health.columbia.edu/content/disability-services</p>	<p>Disability Services supports the University’s commitment to equity and diversity by providing support services and academic accommodations to students with disabilities. Disability Services also coordinates accommodations for events and visitors with disabilities.</p>
<p>Department Administrators’ Manual MS: https://humanresources.columbia.edu/ CUMC: https://admin-manual.cumc.columbia.edu/</p>	<p>These manuals provide guidance for Department Administrators in their day-to-day work. Consult with your central business office to determine if there is a manual specific to your area.</p>
<p>Facilities Management Compliance MS: https://cufo.columbia.edu/ CUMC: https://www.cumc.columbia.edu/facilities-management/campus-life-safety-regulatory-compliance</p>	<p>These offices can be contacted to discuss any and all facilities-related compliance matters and concerns.</p>
<p>Office of University Compliance https://compliance.columbia.edu/</p>	<p>The Office of University Compliance website includes information on University policies, the Compliance Hotline, and compliance-related training, contacts, and resources.</p>



For more information, including an electronic copy of this publication, please go to <https://compliance.columbia.edu>.

To request this document in large print or alternate format copy, please send an email to compliance@columbia.edu. Please allow 1–2 weeks for production.