

DUKE UNIVERSITY AND HEALTH SYSTEM

Code of Conduct

SCOPE

This document serves as a statement of responsibilities for all members of the Duke community to adhere to institutional values and policies, and to abide by all applicable legal and compliance requirements. In that community are Duke University, Duke University Health System (DUHS), and all subsidiary and affiliate entities, and its members are trustees, governing and advisory board members, senior officials, faculty, staff, students, student employees, student leaders and authorized volunteers acting on behalf of Duke.

Duke's Statement on Values and Culture and links to additional policy information may be found at <http://policies.duke.edu/>.

CODE OF CONDUCT

Responsibility to Comply with Laws, Regulations and Duke Policies

All members of the Duke community are expected to comply with applicable laws, regulations and university policies and to seek advice when regulations or policies are unclear.

Because of the wide variety of activities which occur across Duke, there are many laws and regulations that apply. The most common are listed below. The web site references give more information about these requirements, applicability, related Duke policies and procedures and resources for seeking advice or clarity.

Most policies applicable to faculty, staff and students can be found at policies.duke.edu

Managers and supervisors are responsible for knowing the legal and regulatory requirements that pertain to their areas of oversight and responsibility. They are responsible for determining and ensuring that each community member has adequate knowledge in order to do his/her work correctly and receives appropriate information and training on an ongoing basis.

Computer Use and Security: <https://hr.duke.edu/policies/expectations/use-computing-electronic-resources> Duke's policies are designed to balance the free exchange of ideas in support of the academic mission and the need for privacy and security of critical, sensitive and regulated information.

Confidentiality: <https://hr.duke.edu/policies/expectations/confidentiality> Duke retains confidential records for a variety of business needs, much of which must be kept confidential as a matter of federal and state law. Members of the Duke community are expected to protect Duke information, including student, research subject and patient information, by properly safeguarding it, whether it is in use or not, and discussing it only with those who have a legitimate business need to know.

Conflicts of Interest and Commitment Policies: Community members should familiarize themselves and comply with the Duke policies on Conflicts of Interest and Conflicts of Commitment and disclose potential conflicts as required by these policies.

- Financial Conflict of Interest
- Institutional Conflict of Interest
- Conflicts of Commitment, Staff (Staff Handbook)
- Conflicts of Commitment, Faculty (Faculty Handbook)

Environmental Health and Safety: <http://www.safety.duke.edu/> Duke must comply with laws that protect the environment and promote workplace safety. Duke must operate its facilities with all necessary permits, approvals and controls, especially with respect to handling and disposing of hazardous materials and waste. Anyone working with or around these materials must be familiar with the statutes, regulations and policies that apply to them.

Export Controls: <https://export.duke.edu/> Duke must abide by all federal and state laws and regulations that pertain to export controls, including but not limited to the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and the Office of Foreign Assets Control (OFAC) sanctions and embargoes regulations. These laws and regulations control the export (or disclosure) of both goods and technology, collaborating or doing business with certain foreign countries, shipping research materials to another country, hosting foreign visitors, controlling access to restricted or sensitive information, and define prohibited activities for international activities.

Financial: <http://web.duke.edu/policies/financial/index.php> Proper stewardship of university and DUHS funds is the responsibility of all employees involved in financial transactions. Duke funds may only be used for necessary and reasonable business-related expenses incurred in the furtherance of Duke's missions. Dishonesty in all forms, fraud, theft and similar behaviors are all failures of integrity that undermine the whole Duke community. The university and DUHS receive funding from a variety of sources that carry with them fiduciary responsibilities.

Human Resources and Personnel: Duke is dedicated to providing a professional and ethical work environment free of illegal conduct, harassment and inappropriate, abusive or disruptive behavior. Duke is also committed to an equal opportunity work environment where every member of the Duke community is treated with fairness, dignity and respect. No one shall discriminate against any individual on the grounds of race, ethnicity, gender, sexual orientation, gender identity, religion, age, disability or any other factor protected under law. Nor may anyone use a position of responsibility or power to influence others to engage in any prohibited behaviors or actions not consistent with Duke values, professionalism standards or policies. Specific policies related to these and other human resources issues can be found on the Human Resources policy website, <https://www.hr.duke.edu/policies/index.php>.

Policies related to DUHS employees can be found through its intranet with employee login at: <https://egrc.duhs.duke.edu/foundation/Workspace.aspx?workspaceId=-1&requestUrl=>.

Privacy: <https://oarc.duke.edu/privacy/duke-university-privacy-statement> Duke is committed to managing and safeguarding the information collected, used and maintained in support of its missions and to transparency regarding our data management practices. Duke respects the integrity of all its stakeholders, including as represented by personally identifying information about each stakeholder, and takes seriously its responsibility to protect individuals' privacy in balance with meeting its legal, policy and administrative obligations. For more information or to seek advice on privacy regulations, call (800) 688-1867.

Research and Scientific Integrity: Research at Duke is integral to its mission and must always be conducted to the highest ethical standards and in compliance with all applicable laws, regulations, policies and contractual obligations. The details related to how Duke supports these efforts are below:

- Campus: <http://www.ors.duke.edu/orsmanual/policies-responsible-conduct-research>
- Duke Health: <http://medschool.duke.edu/research/misconduct-research>
- Faculty Handbook, Appendix P: <https://provost.duke.edu/faculty-resources/faculty-handbook/>

Additional Research Compliance Oversight

Animal Research: [Office of Animal Welfare Assurance \(OAWA\)](#) Duke must ensure that it complies with all applicable laws and policies concerning animal research. For more information or to seek advice on the care and use of animals in research, call 919-684-3535.

Human Subjects: Duke is responsible for ensuring that research with human subjects takes place with the highest levels of protections for the individuals involved and must comply with all applicable laws and policies. Information on these protections is available through the Duke Institutional Review Boards, <https://ors.duke.edu/research-with-human-subjects> and <http://irb.duhs.duke.edu/>, and through its voluntary accreditation by the Association of Accredited Human Research Protection Programs, <http://www.aahrpp.org/>.

Sponsored Research: Faculty and staff who are involved in federally sponsored research must strictly follow all laws and procedures related to that work. Violations can result in the loss of funds from grants and contracts and, in some instances, civil fines and criminal penalties. Compliance support is available through the Research Costing Compliance office or the research support offices. Further information on each can be found on the following websites:

- Research Costing Compliance: <http://finance.duke.edu/research/>
- Campus research support: [Office of Research Support](#) (ORS)
- Duke School of Medicine and School of Nursing research support:
 - [Advancing Scientific Integrity, Services and Training](#) (ASIST) Office
 - [Office of Research Administration](#) (ORA)

REPORTING CRIMINAL BEHAVIORS

Students, employees, patients and visitors are to report accurately and immediately any criminal offense, or suspected criminal activity, directly to the Duke University Police Department (DUPD). The DUPD can be reached via its website at <http://www.duke.edu/police/index.php> or by calling 911 for emergencies on campus, submitting information using the LiveSafe mobile application, or by calling 919-684-2444 for any non-emergency issues or concerns.

REPORTING OTHER VIOLATIONS OR CONCERNS

Each community member is expected to report violations or concerns about violations that come to his/her attention. Managers have a special duty to adhere to the standards set forth in this document, to recognize violations, to report through applicable channels and to enforce the standards. Violations of applicable laws, regulations, or Duke policies and standards may result in disciplinary action, up to and including dismissal.

Retaliation against anyone who reports possible violations is strictly prohibited. Acts of retaliation may result in an adverse employment action as well as civil or criminal action.

How to Report a Violation or Discuss a Concern

If you witness or are asked to participate in actions that are not consistent with our values or with policies, standards or laws, tell someone. Ask your supervisor or department head for advice. If that is not possible, contact **800.826.8109** to discuss your question or report your concern. The toll-free number is a confidential, and anonymous if you choose, service provided 24 hours per day, 365 days per year.

A third party administers the toll-free line and refers the information to the appropriate compliance office for follow-up and action.

Staff, faculty and students may also directly contact Duke's Office of General Counsel, Duke Human Resources or the Office of Audit, Risk and Compliance. These resources are available during normal business hours for confidential advice and consultation.

If any member of the Duke community has concerns about a Duke student's behavior or health, resources and assistance are available through the DukeReach program:

<http://www.studentaffairs.duke.edu/dukereach>.