

Ethical Conduct Standards

Standards of Conduct – Expectations

CWU Policy 701-08

Effective: May 8, 2023

Policy Review Date: YEAR

Policy Executive: Senior Vice President – Finance and Administration

Responsible Office/Unit: Human Resources

Policy Statement:

Applicability:

Content:

Policy

Appendix A - Ethics in Public Service Procedure

(1) Washington State ethics laws ([RCW 42.52, Ethics in Public Service](#)) are designed to protect state employees from conflicts of interest or from engaging in activities where their interests or loyalties could be divided or questioned. Citizens of Washington State should have complete confidence in the integrity of Central Washington University (CWU) employees. Each CWU employee is to be familiar with the state ethics laws, rules, and other related policies and act in a way that is consistent with law, rules, and policies. Compliance with the ethics requirements is an individual responsibility. Maintaining a working knowledge of the requirements will help ensure proper and ethical actions by employees.

(2) Ethical Principles:

A. Employees are to base their conduct on these core ethical principles:

1. Employees will place the public's interest before any private interest or outside obligation. Choices will be made on the merits of the particular situation.
2. Employees will not take actions or make decisions in the performance of their position in order to gain financial or other benefits for themselves, their family, or their friends.
3. Employees have a duty to conserve public resources and funds against misuse and abuse.
4. Employees will practice open and accountable government. They will be as open as possible about their decisions and actions, while protecting confidential information.

5. Employees will not place themselves under any financial or other obligation to outside individuals or organizations that might influence them in the performance of their official duties.

(3) Ethics Information and Training:

- A. CWU posts this policy and related information on the university website at www.cwu.edu/resources-reports/cwup-2-30-employee-policies. Employees will receive a copy of this policy at New Employee Welcome and new employees are required to attend ethics training within the first three months of CWU employment along with continuing ethics training according to university classification outlined below.
 1. All permanent classified, exempt, tenured/tenure track faculty, and non-tenure track faculty, including coaches, on annual/academic year contracts are required to attend basic ethics training at least once every three years.
 2. Non-tenure track faculty (part-time, less than 9 month), temporary employees, nonperm employes, graduate assistants, research scholars and student employees are required to acknowledge receipt and understanding of ethics expectations at CWU within 30 days of hire.
 3. CWU Human Resources is responsible for coordinating ethics training, both on-line and in-person. Ethics training can be in-person through scheduled classes conducted by the Washington State Ethics Board or by the CWU Ethics Advisor or electronically through CLA on-line.

(4) Violations:

- A. Suspected violations of this policy or state laws on Ethics in Public Service ([RCW 42.52](#)) should be reported to a supervisor, the university ethics advisor, or the internal auditor. A hotline, where anonymous complaints can be filed, is available at www.cwu.edu/internal-audit/hotline. Reports of alleged violations will be investigated.

(5) Ethics Advisory Committee:

- A. The committee reports to and advises the chief of staff on ethical issues. Information about the committee can be found at <https://www.cwu.edu/about/offices/civil-rights-compliance/ethics-workplace/ethics-advisory-committee.php>.

(6) Related Policies:

- A. In addition to RCW 42.52, CWU has adopted policies which establish additional ethical standards for CWU employees, including but not limited to the following:
 1. [CWU 105-02 Statement of Professional Ethics \(Board of Trustees\)](#)
 2. [CWU 301-06 Employee Participation in Political Affairs](#)
 3. [CWU 301-14 Personnel Records](#)

4. [CWU 701-07 Acceptable and Ethical Use of University Information Technology](#)
5. [CWU 701-06 Conflict of Interest in Relationships](#)
6. [CWU 502-03 Research Ethics and Conflicts of Interest](#)
7. [CWU 202-11 Use of State Funds for Light Refreshments and Meals](#)
8. [CWU 305-04 Code of Ethics \(Exempt Employees\)](#)

(7) Confidential Information:

- A. University employees will not disclose confidential information to any person or entity not entitled or authorized to receive the information ([RCW 42.52.050\(3\)](#)). Employees will not disclose confidential information gained by reason of their employment at CWU or use such information for their own, or family or friends, gain or benefit, unless such disclosure is authorized by statute or by a contract with CWU entered into by a university official who had the authority to waive the confidentiality of the information ([RCW 42.52.050\(2\)](#)). See related CWU policy: [CWU 504-03 Student Records - The Family Educational Rights and Privacy Act \(FERPA\)](#).

(8) Gifts:

- A. CWU employees will not seek or receive anything of economic value as a gift except as allowed under [RCW 42.52.150](#). In situations where there is uncertainty as to whether accepting and keeping a gift is allowable, employees should contact Human Resources or the ethics advisor.
- B. Reimbursement of an employee's expenses, by a non-university entity, incurred during activities associated with an employee's official capacity or on behalf of the university are not considered gifts and may be acceptable.

(9) Honoraria:

- A. Per [RCW 42.52.010](#), an honoraria is defined as "...money or thing of value offered to a (university employee) for a speech, appearance, article, or similar item or activity in connection with the (employee's) official role." The receipt of honoraria must be authorized by the university. CWU employees are granted approval to accept an honorarium without further approval if:
 1. The honorarium is not cash or a cash equivalent (stocks, bonds, gift cards, etc.),
 2. The item is valued at less than one hundred dollars, and,
 3. All other restrictions in [RCW 42.52.130](#) are complied with.
 4. If the honorarium is a cash or cash equivalent or is valued at more than one hundred dollars, the employees must obtain university approval prior to accepting the honorarium.
 5. Honorarium will not be accepted in situations where the CWU employees could potentially influence an interest of the person offering the honorarium (as described in [RCW 42.52.130](#)).

(10) Former Employees:

A. Washington State law does not allow former CWU employees to gain an advantage as a result of their decisions or actions while employed by the state. The law does not allow former state employees to help other people with certain kinds of transactions. To avoid conflicts of interest, a) current employees thinking about doing business with the state after leaving CWU employment, or b) a former CWU employee who wishes to do business with Washington State, should, in advance:

1. Review [RCW 42.52.080](#) and [RCW 42.52.090](#); and
2. Seek their own legal advice if desired.

(11) Financial Transactions: Employees will not:

- A. Benefit, directly or indirectly, in a contract, sale, lease, purchase, or grant that is made by, through, or under their supervision (in whole or in part); or
- B. Accept, directly or indirectly, any compensation, gratuity, or reward from any other person beneficially interested in the contract, sale, leave, purchase, or grant; or
- C. Participate in a transaction involving CWU and an organization of which the employee is an officer, agent, employee, member, or in which the employee owns a beneficial interest.

(12) Use of University Resources:

- A. Employees must conserve, safeguard, and appropriately use university resources under their control, or provided for the performance of their duties. Examples of official university purposes/appropriate use of resources include:
 1. Training and career development approved by the university under [RCW 41.06.410](#);
 2. Membership or participation in professional associations that enhance job-related skills of the employee, so long as use of university resources for this purpose are approved in writing;
 3. State or university sponsored health, safety, or diversity fairs and events;
 4. Management of or access to state or university-provided or state-sponsored benefits, including health deferred compensation, insurance, retirement, and employee assistance programs;
 5. Searching or applying for Washington State jobs, including taking an examination or participating in an interview; and,
 6. Placement of nongovernmental web page links on the university website for official university purposes as long as the use does not violate [RCW 42.52.180](#).
 7. Appointing authorities, per [CWU 108-01 Appointing Authority](#), may allow limited usage of university resources to achieve indirect benefits. Appointing authorities may authorize, in advance and in writing, the limited use of university resources for activities and events that:

- a. Promote organizational effectiveness;
- b. Enhance job-related skills;
- c. Build teams;
- d. Improves morale; or
- e. Supports the health safety, and well-being of employees.

(13) Charitable Activities:

- A. Planning and soliciting for approved charitable events and activities may be conducted during working hours so long as the planning and soliciting includes de minimus use of state resources (see Section 13 below):
 1. Managers and supervisors should never personally solicit donations, gifts, or contributions from employees who work under their supervision or over whom they have influence.
 2. Staff engaged in any charitable solicitation should avoid conveying the perception that the solicitation is supported or endorsed by manager, supervisors, or the university.

(14) De minimus Use of University Resources:

- A. Occasional limited personal use of university facilities, computers, and equipment, including email and Internet access, is permitted only if all five of the following conditions are met (per [WAC 292-110-010](#)):
 1. There is little or no cost to the state;
 2. Any use is brief;
 3. Any use occurs infrequently;
 4. The use does not interfere with the performance of any other state employees' official duties; and
 5. The use does not compromise the security or integrity of state property, information, or software.
 6. The following are examples of permissible personal use of facilities, computers, and equipment provided the conditions of de minimus use above are satisfied:
 - a. Electronic communication with children and dependents;
 - b. Streaming music at an employee workstation or in a classroom;
 - c. Using the internet to check personal e-mails and social media and/or for personal shopping;
 - d. Scheduling personal appointments;

- e. Supporting, promoting, or soliciting for charitable activities, including but not limited to CWU Foundation, CWU Alumni, CWU Athletics and member charities of the Washington State Combined Fund Drive; and/or,
 - f. Use of games, during breaks, that an employee does not personally install on a university computer.
7. (G) Public use of films, videos, or TV programs must consider the rights of those who own the copyright to the work. In many cases a public performance rights license is needed and must be obtained on a case-by-case basis. Librarians at the CWU Brooks Library should be contacted for assistance and specific information.
8. (H) The integration of an employee's university and personal on-line information and resources can happen unintentionally. Employees should be vigilant to ensure that personal documents, e-mail, movies, and/or photos are not stored on university computers.

(15) Prohibited Use:

- A. The Washington State Constitution, state and federal laws, and the Ethics in Public Service Act strictly prohibit certain private activity and certain uses of university resources. These rules explicitly prohibit at all times the private use of university resources for outside business or employment, consulting, personal businesses, certain private uses, soliciting, campaigning, lobbying, or other types of prohibited uses as set forth below.
- 1. Outside Business or Employment: University resources may not be used for the purpose of conducting an outside business, private employment, of other activities conducted for private financial gain.
 - 2. Consulting: Work performed by faculty and staff with remuneration from any other than CWU.
 - 3. Private Use: University resources, including but not limited to, computers, cell phones, equipment, tools, materials and supplies may not be removed from university facilities and used by employees for personal or private activities, even if there is no cost to the university. Taking university property for personal use, even property that is to be salvaged or disposed of, is prohibited unless an employee complies with all CWU surplus property procedures.
 - 4. Soliciting: Any use for the purpose of supporting, promoting the interests of, or soliciting for an outside organization or group, including but not limited to, a private business, a nonprofit organization, or a political party, unless such solicitation falls within the exception outlined for organizational effectiveness.
 - 5. Campaigning: Any use for the purpose of assisting a campaign for election of a person to an office or for the promotion of or opposition to a ballot proposition is prohibited. Such use of university resources is specifically prohibited by [RCW 42.52.180](#), subject to exceptions outlined in [RCW 42.52.180\(2\)](#).
 - 6. Lobbying: Any use of university resources for the purpose of participating in or assisting in an effort to lobby members of congress, the state legislature, or other federal or state agency representatives, unless such is part of the employee's official duties and conforms to all applicable laws, including but not limited to [RCW 42.17A](#).
 - 7. Prohibited by Law or Policy: Any use related to conduct that is prohibited by a federal or state law or rule, or a state agency policy.

(16) No Expectation of Privacy:

- A. There is no expectation of privacy regarding the use of university technologies such as e-mails, instant messages, texts, social media posts, websites visited, and voice mails. Ethics rules do not distinguish between the various forms of communication. Such records are subject to disclosure under the Public Records Act ([RCW 42.56](#)).
1. All records related to university business, or created on university technology, must be properly maintained according to state approved records retention schedules, collected, and/or disclosed when requested for university operational or management purposes, even if the records are located on a personal device (See [WAC 106-276: Public Records](#)).
 2. The state ethics law also makes it an ethical violation for a state employee to intentionally conceal a record if he or she knew that the record was required to be released under the Public Records Act, was under a personal obligation to provide the record, but failed to do so (See [RCW 42.52.050 \(4\)](#)).

History:

*Responsibility: F&A; Authority: F&A; Reviewed/Endorsed by: Cabinet/UPAC, Review/Effective Date: 04/15/2020, 05/08/2023; Approved by: A. James Wohlpart, President.
Reformatted and Assigned new Policy Number - Previous Policy CWUP 2-40-075, June 2025
Attached Procedure CWUR 3-45-070 as Appendix A, June 2025.*

Appendix A - Ethics in Public Service Procedure

- (1) These procedures support CWU 701-08 Ethical Conduct Standards. Refer to [CWU 304-02 Whistleblower Act](#) for specific contact information for the Office of the State Auditor and those designated to receive Whistleblower complaints at CWU.

(2) Consultation

- A. Faced with a question of ethics, employees are encouraged to discuss the issue with their supervisor, department chair, dean, and/or appointing authority. The executive director of human resources (HR) is designated as the university's ethics advisor and may be contacted. Since the individual employee is responsible for ethical compliance, the CWU ethics advisor does not approve or disprove decisions or actions. Those who consult with the CWU ethics advisor can expect to engage in discussion about the situation, relevant criteria, laws, and regulations, and/or referral to other resources that may be available to assist in determining a proper course of action.

(3) Documentation

- A. Employees and supervisors are encouraged to document the process used to determine the course of action taken as a result of a question of ethics. Documentation may include a complete description of the situation, the people, agencies, and/or websites that were consulted, as well as the rationale for the final decision.

(4) Internal Complaint

- A. If a university employee does not wish to file a Whistleblower complaint through the State Auditor's Office, they may disclose assertions of improper governmental actions to:
1. Director of Policy and Ethics/CWU Ethics Advisor
(509) 963-2031;
thomas.pedersen2@cwu.edu
 2. The Whistleblower Act does not apply to communications between university employees and HR. Instead, HR provides an additional venue for employees to disclose concerns. To the extent permissible, HR handles all information received in a confidential manner.

(5) Investigation

- A. HR will analyze the complaint and develop a course of action to investigate and resolve the issue. Investigations are performed independently and objectively through interviews and reviewing relevant documents and other evidence. HR documents the investigation procedures and results in working papers.

(6) Retaliation Prohibited

- A. The goal of this process is to create an opportunity where employees can, in good faith, report problems without fear of retaliation. Those who report improper governmental actions and believe they have been subjected to retaliation as a result of this report, should contact the Director of Policy and Ethics (contact information above).

(7) Information and Training

- A. Through HR, new university employees will be provided a summary of the Washington State Ethics Law and specific procedures for reporting improper governmental actions. HR will include workshops on the Washington State Ethics Law as part of the regular training calendar. This workshop will also be included as a requirement of the Supervisory Enrichment Program. Annually, in January, the Director of Policy and Ethics will notify all CWU employees of contacts, procedures, and processes related to the Whistleblower Act.