1. Description

As part of its mission to educate creative, ethical and socially responsible organizational leaders, Bentley is committed to operating with integrity in all aspects of the institution and in all interactions with its stakeholders. During the past decade, the university has made significant strides to further instill this commitment across campus by creating the Alliance for Ethics and Social Responsibility; establishing a confidential help-line (EthicsPoint); revising the academic integrity system with a dedicated academic integrity coordinator; convening an Institutional Review Board with federal assurance; and appointing an institutional ombudsman. President Gloria Larson, who has made ethics, civic engagement, social responsibility, and sustainability core themes of her presidency, has supported this institutional commitment. During her presidency, Bentley has:

- Strengthened its role as a signatory of the UN Global Compact and its Principles for Responsible Management Education (PRME) initiative.
- Further developed a Code of Ethics for faculty and staff supported by an ethics officer and an institution-wide ethics committee.
- Appointed a general counsel at the Cabinet level who also serves as the university’s ethics officer.
- Transferred the university’s director of sustainability from the facilities department to the president’s staff.
- Established the Center for Women in Business (described in Standard 1).
- Signed the American College and University Presidents’ Climate Commitment, an action that commits the university to employing greenhouse gas reduction strategies with the overall goal of achieving carbon-neutrality by 2030.

Bentley’s commitment to integrity and social responsibility embraces not only academic programs, but also institutional and corporate culture. In 2003-2004, we launched the Bentley Alliance for Ethics and Social Responsibility that helps to coordinate our commitment and serves as the umbrella organization for the Center for Business Ethics, the Bentley Service-Learning Center, the Center for Women and Business, the Valente Center for Arts & Sciences, and a wide array of other programs and initiatives. These range from campus diversity to academic integrity to ethics in the classroom and our research. In addition to these programs, policies and practices are reviewed to ensure that employees and students are treated with fairness and integrity. Examples include the 2011-2012 comprehensive review of staff compensation and reviews in progress concerning full-time faculty and adjunct compensation.
Bentley expects all members of the campus community to adhere to the highest ethical standards of conduct and integrity. Bentley faculty and staff members are required to abide by Bentley’s Code of Ethics that is supported by the General Counsel and Ethics Officer, and a university-wide ethics committee. As another means of raising awareness of social and ethical responsibility on campus, EthicsPoint, an industry leader in providing web-based solutions to help manage governance, risk, and compliance, was introduced in Fall 2005 as the platform through which the Bentley Ethics Helpline is hosted. The system also enables individuals to raise their concerns to the Ethics Committee and the Audit Committee of the Board of Trustees. Alleged ethical violations, whether raised through the ethics helpline or other sources, are taken seriously and investigated by the appropriate bodies of the university.

Bentley’s ombudsman serves as a confidential, impartial advisor and resource to staff, faculty, and students in the resolution of formal and informal grievances. Sensitive academic or workplace conflicts may cover a range of both individual and generic problems, including such issues as sexual harassment, perceived discrimination on any basis, and general personality conflicts.

The Division of Student Affairs requires all incoming students to sign and commit to The Bentley Beliefs. The Bentley Beliefs, a core values statement, assert that:

- We strive at all times to treat one another with respect.
- We acknowledge and learn from our differences.
- We act with integrity and honesty in our academic, personal and professional affairs.
- We seek to further the growth and learning of each member of our community and ourselves.

1.1. Academic Integrity

Developed jointly by faculty, administration and students, the Academic Integrity System (AIS) establishes and regulates standards of academic integrity. The Academic Integrity Coordinator (AIC) oversees and facilitates the system and provides educational outreach to students and faculty. The AIC works with the Academic Integrity Board (AIB) when there is a breach of academic integrity that remains unresolved between a student and instructor/college official, when the AIC determines that a hearing is the most effective means of resolving a case, when certain sanctions are recommended, and in cases that represent the most serious breaches of intellectual honesty. In these instances, it is the responsibility of the AIB to determine if there has been a violation and what, if any, sanction should be imposed.

In December 2010, a survey was conducted among 220 undergraduate students to assess their familiarity with the academic integrity system, and their personal experiences with cheating, witnessing cheating, and faculty policing and response. The 2010 survey is part of a comprehensive outreach effort to undergraduates and graduate students intended to emphasize the importance of academic honesty, and to further inculcate a commitment to ethical behavior as part of business education and subsequent practice.

Detailed policies concerning academic integrity for undergraduate and graduate students are published and available in print and on-line in the Undergraduate Student Handbook and the Graduate Student Handbook which

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1 Membership of the Academic Integrity Board includes both faculty and students.
include information on the Bentley honor code, faculty responsibilities and rights, student responsibilities and rights, and maintaining individual and community academic integrity.

1.2. Judicial system

Bentley’s Judicial System, also referenced in Standard 6, serves and educates the Bentley community, assuring that the university is a safe, pleasant, and stimulating environment conducive to academic and personal development. The judicial system’s goals, anchored in the educational mission of the university, are designed to educate students, hold them accountable and responsible for their actions, maintain the welfare of the campus community, foster a sense of community and mutual respect across campus, and help students develop alternatives to inappropriate behavior.

1.3. Training, compliance, and adherence with regulations and legal requirements

In 2010, as part of Bentley’s ongoing compliance and training efforts, the university implemented a training program for staff members using the Mandatory Online Awareness Training (MOAT) system. Staff members are automatically enrolled in this password protected system and are required to certify on an annual basis that they have read the following policies: (1) code of ethics for faculty and staff, (2) confidentiality agreement, (3) data classification and usage policy, (4) equal employment opportunity and nondiscrimination policy, (5) faculty and staff grievance procedures, (6) family education rights and privacy act (FERPA) policy, (7) information security awareness, (8) nepotism and consensual relationship policy, (9) procedures for resolution of harassment and discrimination complaints, and (10) the written information security plan. In 2012, a new online workplace harassment-training program will be offered to all staff and faculty. As part of the implementation plan, discussions will be held concerning faculty enrollment in all aspects of compliance training.

1.4. Non-discrimination policies

The university has a detailed Equal Opportunity and Harassment Policy. Bentley is committed to equal opportunity for all students, student employees, faculty and staff members, and applicants for employment or admission. The institution is committed to not discriminate on the basis of race, color, religion, gender, sexual orientation, age, national origin, ethnicity, or veteran or disability status.

As an example, the Office of Disability Services is committed to providing equal educational opportunities for students with disabilities and impairments. It is the university’s policy that no qualified student be excluded from participating in any university program or activity, be denied the benefits of any university program or activity, or otherwise be subjected to discrimination with regard to any university program or activity. Bentley also runs a series of diversity-related workshops and retreats, which include a diversity retreat and follow-up workshops, (dis)ability awareness workshops, and ally workshops (introducing participants to being an ally on sexual identity issues).

Bentley has developed an explicit strategy to increase the diversity of the faculty. In 2011 the university played a pivotal role in the creation and development of the Massachusetts Business School Collaborative to focus on the recruitment and retention of faculty of color. Other faculty diversity initiatives include the ALANA distinguished visiting teacher and research scholar program and ALANA faculty exchange and visiting professor program. Initiatives to increase faculty diversity are discussed more fully in Standard 5.
Standard 11.

1.5. Board of Trustees and Officers

The Audit Committee of the Board of Trustees is responsible for assuring the integrity of the university’s financial statements; its compliance with legal and regulatory requirements relating to the financial operation of the university; the independent auditor’s qualifications, independence and performance; the university’s systems of disclosure controls and procedures; internal controls over financial reporting (and compliance with ethical standards adopted by the university); and the university’s enterprise risk management (ERM) program. It also reviews and discusses the institution’s annual financial statements and internal controls reports with management and the independent auditor. Beyond the above, the committee:

- Further promotes quality and integrity by reviewing and periodically updating Bentley’s established code of business conduct and ethics, as well as determining whether management has established a system to enforce this code.
- Determines whether the code is in compliance with all applicable rules and regulations leveraging the university’s partnership with EthicsPoint.
- Reviews management’s monitoring of the university’s compliance with its code of business conduct and ethics, and determines whether proper review systems are in place to insure that the university’s financial statements, reports, and other financial information are disseminated to the appropriate governmental body or the public.

The university also carefully oversees the involvement of its trustees with corporations or other entities it does business with. These regulations are outlined in a detailed conflict of interest policy (Appendix 11.1). All trustees, officers and senior managers are required to complete a conflict of interest form each year with the information gathered reported to the Audit Committee by the general counsel.

1.6. Institutional Review Board

Bentley is committed to assuring the safe and ethical treatment of human participants in research. The Institutional Review Board (IRB) was formerly a part of the Office of Sponsored Programs (responsible for coordinating government grant submissions). In 2004, a new IRB was constituted under the Alliance for Ethics and Social Responsibility and chaired by its director. Federal and university regulations stipulate that all faculty, staff, and student research projects involving human subjects must be reviewed and approved by the IRB. The university follows the principles outlined in the Belmont Report, emphasizing respect for persons, beneficence and justice in our treatment of participants in our research projects. The IRB has been granted Federal-wide Assurance (FWA00007335) by the Office for Human Research Protections (OHRP).

1.7. Enrichment activities

Bentley sponsors a number of conferences, seminars, and related enrichment activities dedicated to the promotion of responsible, ethical behavior. These include the Center for Business Ethics’ Raytheon CEO speaker series and Verizon visiting professorship in ethics, the Alliance for Ethics and Social Responsibility’s Global Business Ethics Symposium and Faculty Development Business Ethics Teaching Workshop sponsored by the State Street Foundation, and Bentley’s role as a signatory of the United Nations Global Compact Principles for Responsible Management Education Initiative (PRME).
1.8. Bentley’s charter and compliance with legal requirements

Bentley’s transition from college to university status with a doctoral program is reflected in Bentley’s articles of incorporation that were amended to reflect that change. Bentley’s revised statement of purposes set forth in the restated Articles of Organization of the Corporation, now reads: To conduct an institution of higher education to provide instruction in business and liberal arts and sciences; to prepare, publish and circulate publications in the foregoing areas stipulated, but not for the purpose of carrying on propaganda or otherwise attempting to influence legislation; to grant to students properly accredited and recommended by the faculty the degrees of ‘Associate in Science,’ ‘Bachelor of Science,’ ‘Bachelor of Arts,’ ‘Master of Science in Taxation,’ ‘Master of Science in Accounting,’ and other Masters Degrees limited to business and related disciplines, ‘Doctor of Philosophy in Business,’ ‘Doctor of Philosophy in Accounting,’ and to confer such honorary degrees as are usually conferred by colleges in the Commonwealth of Massachusetts.

Bentley University is incorporated as a non-profit charitable corporation pursuant to the provisions of the Massachusetts General Laws, Chapter 180, and is authorized by the Board of Higher Education to grant degrees pursuant to Massachusetts General Laws, Chapter 69, Section 30. The university observes all applicable state and federal regulations. Bentley complies with the standards, policies, and requirements of the Commission on Institutions of Higher Education.

2. Appraisal

Building on a long-term commitment to assuring integrity across the institution’s programs and operations, the university placed renewed emphasis on ethics and responsibility under the leadership of President Larson. Two key strengths are (1) the range and breadth of activities focusing on integrity-related concerns that touch all stakeholders, and (2) the number of Bentley-sponsored enrichment and community-outreach activities that range from our programs in the Center for Business Ethics\(^{2}\) to the Alliance for Ethics and Social Responsibility and to our close association with the Conscious Capitalism Institute.

Bentley’s commitment to ethics, responsibility, sustainability and integrity in our academic programs and campus operations has also received external recognition. In academic programs, the university earned the notice of the prestigious Aspen Institute for the societal relevance of the MBA in preparing students to meet real-world challenges and integrating social and environmental sustainability into research and curriculum. The institute’s 2011-2012 global survey of MBA programs, Beyond Grey Pinstripes, placed Bentley’s MBA programs in the top 100 in the world (58 globally and in the top five in New England) in preparing students for social and environmental stewardship. Bentley’s efforts also warranted its inclusion in the UN Global Compact Inspirational Guide for the Implementation of PRME and its Practical Guide to the United Nations Global Compact for Higher Education Institutions, and selection by the Association to Advance Collegiate Schools of Business (AACSB) as a 2010 spotlight school on their Ethics and Sustainability Resource Center.

\(^{2}\) The Center for Business Ethics was established in 1976 and is one of the oldest business ethics education and research centers in the United States.
Standard 11.

Important to maintaining and building on Bentley’s commitment to integrity is the continued integration of new programs and the regular review of existing programs to insure that they are broadly understood and continue to help the community reach its goals. Two key systems established in the mid-2000s, namely the ethics policy and the academic integrity system, are currently under review to determine their effectiveness and if any changes are needed. The 2010 survey of students concerning academic integrity referenced above underscored the importance that students place on academic integrity but it raised concerns about the level of commitment of some faculty members to upholding these expectations and standards. Consequently, increasing faculty involvement in the system is an area being addressed in the review. The student-led academic integrity council also plans to undertake surveys every other year to track the views of faculty and students with respect to academic integrity.

Although Bentley’s ombudsman policy can be accessed through the university website, the information available needs to be expanded and added to the Human Resources webpage. Currently the position of ombudsman is listed in the student handbook, but without a statement of role and responsibilities. The lack of information about the policy and position potentially limits the effectiveness of the position. Other policies and procedures related to institutional integrity, although in place, are not always up to date and ownership for keeping them current is not always clear.

3. Projection

Moving forward, Bentley is committed to:

Completing the assessment of the ethics policy, including the role and responsibilities of the Ethics Committee and the effectiveness of EthicsPoint. **Timeline:** Completed Spring 2103: General Counsel and Ethics Officer.

Revising the academic integrity system to make any necessary revisions and updates to the policies and programs. **Timeline:** Spring 2013 through Fall 2014: Academic Integrity Coordinator.

Expanding the dissemination of information about the role and responsibilities of the ombudsman. **Timeline:** Fall 2013 through Spring 2014: Special Assistant to the President and Ombudsman.

Institutionalizing the required annual certification process for MOAT, and utilizing the system to deliver timely information and training opportunities. In addition to this annual certification process, MOAT will be utilized throughout the year as a tool to deliver various information and training opportunities. **Timeline:** Spring 2013 through Spring 2014: Executive Director of Human Resources.

Establishing a timetable and ownership for the regular review of programs and policies related to institutional integrity, including the academic integrity system, Ethics Point, the Institutional Review Board, and the copyright and intellectual property policy. **Timeline:** Fall 2013 through Spring 2014: Faculty Senate.

Maintaining a carbon footprint reduction of 50% (compared to a FY2008 baseline) by employing energy efficiency and renewable energy strategies coupled with the engagement of faculty, staff and students in this environmental and social responsibility effort. **Timeline:** Spring 2013 through Spring 2015: Director of Sustainability and Special Advisor to the President.
4. Institutional Effectiveness

Bentley is committed to operating with integrity and verbalizes this commitment in its mission, vision, and values statement. The university regularly assesses and updates the policies and procedures that enable us to fulfill this commitment. In addition, we have created internal mechanisms such as the Alliance for Ethics and Social Responsibility and the Ethics Committee, and engaged in external activities including becoming a signatory of the United Nations Global Compact and its Principles for Responsible Management Education (PRME) initiative to reinforce our commitment to integrity in academics, student life, and the institution as a whole.
Standard 11.
BENTLEY UNIVERSITY
CONFLICT OF INTEREST POLICY

1. **Scope:** This policy applies to all trustees, non-trustee committee members, officers, and certain employees of Bentley University.

2. **Period Covered:** July 1, 2012 to June 30, 2013

3. **Fiduciary Responsibilities:** Trustees, officers, and employees of Bentley University serve the public trust and are required to fulfill their responsibilities with care and loyalty. All decisions and actions of the board and the administration are to be made for the sole purpose of advancing the best interests of the institution and the public good. The integrity of Bentley University must be protected at all times.

4. **Disclosure:** The Conflict of Interest Policy and Disclosure Form will be distributed by the General Counsel’s Office at the beginning of each new Fiscal Year. The Forms must be completed and returned to the General Counsel’s Office in a timely manner.

   - All trustees, officers, and certain employees are required to disclose any business or financial relationship they or members of their immediate family, or domestic partner have or propose to have with the University, either directly or through another entity in which they have a significant interest.

   - Filing employees with immediate family members or domestic partners currently employed at Bentley University are required to disclose this information on the disclosure form to include the name and title of these parties.

The disclosure form is to be filed annually; an amended disclosure is to be filed in the event of a material change in circumstance or should a conflict of interest arise subsequent to the filing. Additionally, if a trustee, officer or selected employee becomes aware of an actual or proposed conflict during the year, subsequent to completing the disclosure form, they are required to contact Deanna Chiampa at extension 2975 or dchiampa@bentley.edu to report this information which will be brought to the Audit Committee for review.

The following guidelines are provided to help trustees, officers, and selected employees determine whether a relationship should be disclosed:

- A business or financial relationship includes the sale or acquisition of a substantial amount of goods, property, or services; the commitment of substantial resources to a common venture; or, in the case of a member of one’s immediate family, an employment relationship. A “substantial” amount of goods, property or services is defined as having a value of $50,000 or more, or represents 2 percent or more of the gross revenues of the organization doing business with the University, whichever is less, in any year.

- A member of one’s immediate family means a spouse, domestic partner, child, parent, sibling, or any other relative if the latter resides in the same household as the trustee, officer, or employee. A domestic partner is a spousal equivalent where the two parties are not married and reside together in the same residence.

- A significant interest in another entity includes service as a trustee, director, partner, or management-level employee; the actual or beneficial ownership of more than 5 percent of the entity; or a compensation arrangement that is dependent upon a business or financial relationship with the University.
Appendices.

The foregoing guidelines are not intended to be exclusive; other relationships or interests that might conflict with the best interests of the University should also be disclosed.

Disclosure forms will be filed with the General Counsel’s Office and copies will be provided to the Audit Committee.

5. **Restraint on Participation:** Trustees, officers, and selected employees who have disclosed a potential conflict of interest shall refrain from participating in the University’s consideration of any proposed business or financial relationship which he or she is interested, except to respond to questions or to provide further information. If a transaction or relationship requires a board or committee vote, the interested party should not be present at the time of the vote.

6. **Approval of Business or Financial Relationship:** All disclosures will be submitted to the Assistant for the General Counsel and will be reviewed by the Audit Committee. The Audit Committee, or in appropriate cases, the Board of Trustees, will determine whether a given business or financial relationship is in the best interest of the University and should be entered into or continued.

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**BENTLEY UNIVERSITY**

CONFLICT OF INTEREST DISCLOSURE STATEMENT

Trustees, Officers, Directors and Key Employees

I have read the Conflict of Interest Policy approved by the Board of Trustees. I understand and agree to conform to the provisions of that policy.

In determining whether there is a “material affiliation” with any organization, it is understood that these words include a position such as an officer, director, trustee, partner, agent or employee, the ownership of five percent or more of the beneficial or proprietary interest in the organization and any other substantial interest in or dealings with the organization. In answering the following questions I have, to the best of my knowledge, included material affiliations of my immediate family as defined in the policy, as well as those that apply to me individually.

1. Do you or does any member of your immediate family, or does any organization with which you or any of them have a material affiliation, sell goods or furnish services or otherwise do business with Bentley University or have any reasonable expectation of doing so in the future? If so, please list the details below, if not, please so state.

   Company or Organization___________________________________________________

   Nature and extent of relationship or affiliation _______________________________
   _______________________________________________________________________
   _______________________________________________________________________
   _______________________________________________________________________

   Nature of business with Bentley____________________________________________
   _______________________________________________________________________
   _______________________________________________________________________
   _______________________________________________________________________

2. Do you have any direct or indirect relationship with any person or organization which, in your judgment, is of such a nature that it is not in conflict with Bentley but which you wish to make known in the interest of full disclosure? The disclosing party should list here any member of his or her immediate family who is employed by Bentley University.
3. In the Form 990 we are required to report whether any of our officers, directors, trustees or key employees had a business or family relationship with another officer, director, trustee or key employee. In order to respond to this question, we are asking you to complete the following information.

Attachment A sets out the definition of Family and Business Relationship taken from the IRS regulations. Additionally, Attachment B sets out a list of Trustees, non-Trustee Committee members, Officers and Key Employees.

Between July 1, 2012 to June 30, 2013 and up through the date of response, did you have a family relationship or business relationship with any other officer, director, trustee or key employee?

Yes __________________ No __________________

If yes, please provide all the details of this relationship.

___________________________________________________________________________________________

___________________________________________________________________________________________

___________________________________________________________________________________________

I agree that if there is a material change in any statement or information provided above, I will immediately notify the Assistant to the General Counsel, Deanna Chiampa, at dchiampa@bentley.edu or 781.891.2975, and complete an amended disclosure form. I further agree that I will refrain from participating in the University’s consideration of any proposed business or financial relationship in which I, or a member of my immediate family, may be interested, except to respond to questions or to provide further information.

__________________________________________________________

Name (please print)

______________________                                    ________________

Signature                                         Date

Please retain a copy of the signed form for your own records. Trustees – please return the completed form in the preaddressed envelope provided or via email to dchiampa@bentley.edu. Employees – please return the completed form to the Deanna Chiampa, Rauch 326 or via email to dchiampa@bentley.edu
Appendices.