



# COMPLIANCE COMMUNICATOR

## Welcome!



Welcome to the inaugural edition of UVM's Compliance Communicator! This newsletter aims to raise awareness of trending compliance issues. All of us have a role to play in meeting UVM's compliance responsibilities and we understand that keeping abreast of all of UVM's policies and procedures may at times seem a daunting challenge. Please take a few minutes and read up on some of the latest issues.

For more information on the Compliance Program and additional resources visit our website [www.uvm.edu/compliance](http://www.uvm.edu/compliance)

Remember if you have a compliance question we can be reached at [Compliance@uvm.edu](mailto:Compliance@uvm.edu) or (802)-656-3086.

## FALL 2014

### Contents



Welcome! 1



Spotlight on Policies :  
Protecting Minors on  
Campus - Important  
information for  
Departments 2



Fall Reminders - Conflicts of  
Interest and Commitment 2



Identity Theft and Your  
UVM Credentials 3



Q&A 4  
Training  
Opportunities 4

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## Spotlight on Policies - Protecting Minors on Campus



UVM's campus provides facilities and resources for numerous educational programs and other activities for minor students and children. These include athletic, music or academic camps; child-care programs; summer or break camps; and certain research activities, among others. It is critical for departments to identify any of their activities that include minors to ensure the safety of this most vulnerable population. The Protecting Minors on Campus policy requires **sponsoring** departments to:

- Notify the Department of Risk Management and Safety about the program,
- Consult with General Counsel regarding all service and housing agreements or contracts related to the program,
- Ensure that proper written communications about the program are provided to parents/legal guardians prior to the program,
- Ensure background checks are completed prior to the program for all individuals that will have contact with minors,
- Ensure all individuals involved in the program receive the required training.

For the complete policy including reporting requirements for suspected abuse or neglect see:

[http://www.uvm.edu/policies/general\\_html/protectminors.pdf](http://www.uvm.edu/policies/general_html/protectminors.pdf)

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## Reminder!! Conflicts of Interest and Commitment



*A conflict of interest is an activity that comprises or appears to compromise an employee's judgment in performing the employee's job responsibilities.*

The start of a new academic year is a good time to think about any new (or old!) activities that should be disclosed to your chair or supervisor per the Conflicts of Interest and Commitment policy. This policy requires all employees to disclose potential conflicts of interest or commitment. Employee participation in professional, community service and other external activities is generally encouraged; these activities contribute to both professional development and enhance University prestige. However, such activities may give rise to potential conflicts of interest or commitment that require disclosure and in some cases may need to be managed in order to preserve the public trust and ensure employees are able to meet their University responsibilities. (Continued)

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A conflict of interest is an activity that comprises or *appears* to compromise an employee's judgment in performing the employee's job responsibilities. A few examples of possible conflicts of interest or commitment include:

- Accepting external employment or consulting contracts during a period of UVM employment
- Holding financial interest in an entity that competes with the University (excluding publicly traded companies)
- Employing University employees or students over whom the employee has supervisory responsibilities or authority for non-UVM activities
- Serving as an officer or on the board of directors of an organization that interacts or does business with the University.



The above are just a few possible examples. If you are unsure of whether an activity poses a conflict, it is best to err on the side of over disclosure. Refer to the policy for more information, including how to make a disclosure and what conflicts are prohibited at:

[http://www.uvm.edu/policies/general\\_html/conflictinterest.pdf](http://www.uvm.edu/policies/general_html/conflictinterest.pdf)

Note that Officers of Administration annually file a disclosure form administered by the Office of the Vice President for Executive Operations. Additionally, further disclosures may be required for investigators participating in externally funded research, see:

<http://www.uvm.edu/policies/grants/researchcoi.pdf>

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## Identity Theft and Your UVM Credentials



Recent malicious phishing scams have targeted higher education employees and students. These creative schemes direct email recipients to click on links that will take the user to a site that may cleverly mimic the MyUVM web portal or other official looking UVM sites. Falling for these schemes puts your sensitive personal information at risk, as well as any sensitive University information you may have in your email accounts or are able to access via UVM's information systems. Personal information that may be stolen and used for identity theft or financial fraud includes Social Security Numbers for you and your dependents and financial account numbers used for payroll deposits, among other personally identifiable information. (Continued)

Remember UVM will never ask you to enter your Net-ID and password on a non-UVM webpage. To read more about this risk and how to safeguard your personal information visit Enterprise Technology Services' Information Security website at:

<https://www.uvm.edu/it/security/>

If you are ever uncertain about the legitimacy of an email message concerning your *uvm.edu* account, please contact the Computing Help Line at 656-2604, or [submit a help request online](#).

If you realize that you've been tricked into disclosing your UVM password, change it immediately and then notify the Computing Help Line.

## Training Opportunities



### Preventing Sexual Harassment and Bias Training

Did you know that the AAEO Office provides bi-weekly training on Preventing Sexual Harassment and Bias? Employees can sign up through HRS Learning Services. For scheduled dates of this and other training offerings visit:

<http://www.uvm.edu/hrs/?Page=skills/classesbydate.html&SM=skills/skillsmenu.html>

## Q&A



**Q: I just learned that a good friend of mine at work is being investigated for allegations of sexual harassment. I can't believe it's true and think it's only fair to give him a "heads up" so he can defend himself. Don't I have responsibility, as a friend, to tell him?**

**A:** Under no circumstances should you give him a "heads up." Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An allegation of sexual harassment is a very serious matter with implications, not only for the individuals involved but also for the University. Alerting your friend could jeopardize the investigation and expose the University to additional risk and possible costs.

**Q: I reported an issue internally to my supervisor and nothing is being done. What should I do now?**

**A:** It may not always be apparent when action has been taken, but it is still a good idea to follow up to be sure. If you are comfortable doing so, talk to your supervisor. Perhaps you could ask if any additional information is needed. You can also contact any of the other resources listed in UVM's Code of Business Conduct, including the Ethics and Compliance Reporting and Help Line at:

<https://secure.ethicspoint.com/domain/media/en/gui/24544/index.html>