How Do U Comply?

Compliance Reminders for Employees

This document highlights some of the compliance responsibilities of employees at DU. *It is not exhaustive and does not cover all policies or legal requirements.* If you have specific questions, consult your supervisor or contact Enterprise Risk Management (ERM) at risk@du.edu.

To view the most up to date Compliance Reminders, please visit ERM's website.

All DU Policies, including those listed below, can be found on DU's Policy Library website.

Contracts

- (1) Contract Approval: Contracts must be reviewed in accordance with DU's Contract Management Policy (FINA 2.10.023) prior to execution and signature. Only specific officers and employees have authority to sign on behalf of DU. See Limits of Authority Policy (FINA 2.10.030) and Internal Control Policy (FINA 2.10.090).
- (2) **Data Protection Addendum (DPA)**: Required when vendors receive or process personal data as described in DU's Privacy Policy. Please see <u>DU's Privacy Policy webpage</u> for additional information.
- (3) **FERPA Addendum**: Required when vendors receive or process student education records as defined in the Family Educational Rights and Privacy Act of 1974 (FERPA).
- (4) Foreign Source Contracts: Determine if the vendor/individual is a Foreign Source. If the vendor/individual is a Foreign Source, you need to determine if the contract is required to be reported to ERM by using <u>DU's Foreign Gift and Contract Reporting website</u>. This website has definitions and tools to help you determine if the contract must be reported. See <u>DU's Foreign Gifts</u> and Contract Reporting Policy (RISK 12.10.040).

Data & Software

All new technologies and software must undergo a New Tech Review through the IT <u>Technology Solutions Center</u>. If the technology is new for your department, you are purchasing new services or features for existing technology, or the terms have changed, you must complete the <u>Technology and Data Services Review Form</u>. Do not assume this has been completed if another department is using the technology. This is also required for technology that is free to download or use. See DU's Technology Acquisition Policy (IT 13.10.040) and Procurement Policy (FINA 2.10.033).

Student Education Records & FERPA

Follow requirements for protecting student education records pursuant to the Family Educational Rights and Privacy Act of 1974 (FERPA). Understand when FERPA allows disclosure of education records without a student's permission. More information is available on the Office of the Registrar's Privacy/FERPA webpage.

Records Management

Employees must keep or dispose of records in accordance with <u>DU's Record Retention Schedule</u> and DU's Records Management Policy (RISK 1.10.025). Retention periods are often based on legal requirements.

Report Discrimination and Harassment

All University Employees* are considered a Responsible Employee. This means **YOU** have an obligation as a Responsible Employee **to report** *within 24 hours* potential discrimination or harassment (including based on race, color, national origin, shared ancestry, disability or any other protected status) or sex-based prohibited conduct (including sexual assault, stalking, dating violence) as further defined in DU's Discrimination and Harassment Policy. Reports should be submitted on <u>DU's Equal Opportunity & Title IX website</u>. See DU's Reporting By University Employees of Disclosures Policy (EOIX 3.10.011) relating to the DU's Discrimination and Harassment Policy (EOIX 3.10.010). *Excludes Confidential Employees.

Hazing

All University Employees* are considered a Responsible Employee. This means <u>YOU</u> have an obligation as a Responsible Employee **to report** instances and acts of hazing that you learn of or are witness to by using the <u>Student Rights and Responsibilities (SRR) Incident Report Form</u>. Hazing is defined in <u>DU's Honor Code</u>. See DU's Interim Hazing Policy (SAFE 7.10.012) and Clery Act Compliance Policy (SAFE 7.10.010). *Excludes Confidential Employees.

Protection of Minors

You **must register** all programs and activities (e.g., camps, special events, tutoring sessions, lessons, lab internships) involving minors under the age of 18 (who are not DU students) by going to <u>DU's Youth on Campus website</u>. Training and background checks are often required. See DU's Protection of Minors on University Premises and in University Programs Policy (RISK 2.50.060).

Conflict of Interest

Employees **must promptly report** any real or perceived conflicts of interest in accordance with DU's Conflict of Interest Policy (3.20.060). To report a conflict of interest, go to <u>DU's Conflict of Interest website</u>.

Ethics, Compliance & Whistleblowing

Employees can make an anonymous report about concerning or unethical behavior. Visit <u>Internal Audits' website</u> to make a report. See DU's Retaliation and Whistleblower Protection Policy (AUDT 18.10.010).

Confidentiality & Data Privacy

Employees sign the DU Confidentiality Obligations, committing to comply with DU's principles of transparency, data minimization, and protection of personal information across academic and administrative environments. You can find DU's Confidentiality Obligations on MyDU and learn about DU's privacy principles on the Privacy at DU website.

Employee Injuries

All employee injuries that occur while working **must be reported** *within 24 hours* of the injury occurring. Seeking treatment and/or workers' compensation benefits is optional for the injured employee. To report and for a list of designated medical providers, go to <u>DU's Injuries website</u>.

Driving for DU

Driving authorization is required **before** driving for DU – including driving personal or rental vehicles, driving to Kennedy Mountain Campus, and driving to local events held off campus. To seek

authorization, visit <u>DU's Driving website</u>. See DU's Use of University Vehicles Policy (RISK 12.10.010).

Travel

International Travel: All faculty, staff, and students travelling internationally for University-related purposes must register their travel with the University in the appropriate way found on the Register Your Travel website. Faculty and staff taking groups abroad should visit the Short-Term Programs website or contact intlsafety@du.edu. Timely reporting of incidents abroad is essential for health, safety, and compliance with federal regulations. How to report can be found on DU's Report an Incident Abroad website. See DU's International Travel Policy (RISK 2.50.070).

Domestic Travel: DU-related domestic travel must be booked according to <u>UFS' requirements</u>. If a University employee or student is driving for University purposes, they must have obtained authorization from ERM prior to the start of the trip.

Research

Research involves many specific compliance obligations. For more information, please visit <u>DU's</u> Required Training for Research website.

Employee Handbook

For topics related to employment, please refer to HRIC's Employee Handbook.

DU Brand Tools & Templates

To maintain consistency in branding and communications, DU requires the use of certain colors, fonts, website platforms, and email marketing platforms. Tools to help support the creation of communications materials (PowerPoints, newsletters, flyers, posters, brochures, and more) can be found on <u>University Relations' brand website</u>. Please email <u>brand@du.edu</u> with any questions.

Important Reminder

Some University roles have specific compliance requirements for that position. If you are unsure about your compliance obligations, please consult your supervisor or contact ERM at risk@du.edu. For unit- and/or job-specific compliance obligations, we recommend creating a similar reminders list.