



CONFIDENTIALITY AND SECURITY OF RECORDS

Generally, any document you receive or create while working at UWM is a state record and must be maintained and cared for properly.

Some basic tips for handling UWM records are:

- Do not take home UWM records, especially originals, without advance permission from your supervisor.
- Your own personal notes are generally exempted from state records requirements. However, you should still take care with personal notes that contain sensitive or confidential information.
- Do not use your work access to UWM records for personal purposes. Use UWM information or records ONLY to perform your job.
- Many UWM records are covered by laws or policies requiring confidentiality (e.g., student records, certain employee records including home contact information and medical information, patient records, social security numbers and certain financial information). Ask your supervisor about confidentiality laws/policies that impact your job duties.
- UWM records may be discarded or destroyed only as allowed by law. Many UWM records are subject to a retention schedule (maintained by the UWM Archives Department). Do not discard/destroy records unless permitted by the retention schedule. Be sure that any documents containing confidential information are properly destroyed (e.g., shredded).
- If a member of the public requests a copy of a UWM record, refer that requestor to UWM's Public Records Custodian.

UWM CONTACTS

Internal Audit Office

414-229-5586

- Questions on ethics
- Confidential record breaches (non-electronic)
- Misuse of University resources and other possible ethics violations

Office of Legal Affairs

414-229-4278

- Counsel on legal issues

Chief Information Officer

414-229-3713

- Confidential record breaches (electronic).
In the event of a suspected security breach, please contact Information Security at infosec@uwm.edu or 414-229-1100.

Public Records Custodian

414-229-5188

- Public records requests

Archives Department

414-229-5402

- Retention schedules for records

Purchasing Office

414-229-4301

- Procured goods and services

Applicable Rules and Policies

For a comprehensive list of all rules and policies referenced or used in the creation of this brochure, please go to:

uwm.edu/legal/resources/ethicslinks.cfm

KEY ETHICAL & LEGAL ISSUES

for Employees



Presented by Internal Audit & Legal Affairs

EMPLOYEE ETHICS

UWM is an agency of the State of Wisconsin and its employees are bound by certain ethical rules that apply to all state employees. Here are tips employees should follow to avoid potential ethical violations.

Accepting Items of Value

Do not accept items of any value from a person or organization as a result of your employment at UWM. This includes anything that creates the appearance that your official conduct may be influenced by the gift. For example:

Meals and Entertainment: Do not accept meals or entertainment (e.g. golf outings) from UWM suppliers or prospective suppliers, even if it is intended to aid you in discussing UWM business. If a meal or event is appropriate, it should be paid for by UWM through a Travel Expense Reimbursement form. An exception is for a working meeting held onsite, where food is provided to allow the meeting to continue past meal hours.

Gifts and Gift Baskets: Do not accept gifts, including birthday gifts, gift baskets, gift certificates, etc. While these gifts may be common marketing tools in corporate business, they create the wrong impression within a state agency. If a gift arrives, talk to your supervisor about gently declining it or asking the supplier to send it to a charitable organization.

Travel: In many cases, UWM employees may not accept supplier-paid travel, even when it benefits the department. Supplier-paid travel should only be accepted by an employee who is not in a position to approve or influence a contract with that supplier, and only after the situation has been reviewed and approved by the dean or division head.

Items of Minimal Value: Items of minimal value (e.g. pencils, cups) are not prohibited. However, keep an eye on appearance when using a supplier's marketing item at work. If an employee is in a position to approve or influence a contract with a supplier, the employee may not even accept items of minimal value.



Your Family & Other Personal Relationships

Ethical rules also apply to your family members and other personal relationships. For example:

Accepting Items of Value: Like yourself, members of your immediate family or household may not accept items of value from a person or organization as a result of your employment with UWM.

Personal Relationships with Vendors: If you have a personal relationship with someone who is doing business with your department, disclose that relationship to your supervisor so that actions can be taken to minimize or remove any potential conflict of interest arising from that relationship.

Nepotism: Unclassified employees may not participate in a decision to hire, retain, promote or determine the salary of a member of their immediate family. Classified employees may not hire or promote a member of their immediate family unless that person has been certified from an open or competitive promotional register. Your division may establish more stringent rules prohibiting nepotism.

Outside Consulting: If you are an unclassified employee and have an opportunity to do consulting or other work for an outside organization in an area related to your area of expertise at UWM, you must discuss the opportunity with your dean or director to ensure that no conflict of interest will be created. Refer to UWS 8 for applicable standards and procedures.

Use of University Resources: University resources such as office supplies, cell phones, meeting rooms, and work time should be used only for university purposes. Phone and email may be used for minimal personal use consistent with university policies. Never use UWM resources, including email and telephone, for outside work.

Personal Purchases: Be careful that your employment with UWM does not cause the supplier to grant discounts or give other incentives that would not be available to the general public.

Signature Authority on Contracts

Only certain individuals, designated by name, have the authority to legally bind UWM in contracts or agreements. Do not sign a contract with an outside entity unless you have received a letter delegating permission for you to do so.

Supplier Etiquette

Communication: You may not have any contact with a supplier while bid or proposal process is open.

Fair and Equal Treatment: You must give every supplier the same information and opportunity to quote on bid requirements. This means that you cannot provide one supplier with the quote of another supplier and ask them to meet or beat it. It also means that if you are changing a requirement, you must give every supplier an opportunity to re-quote on those new requirements.

Hand Shake Deals: You may not give any commitment to a supplier that a purchase will be made for more than \$5,000 before Purchasing issues a purchase order.

Prizes, Gifts and Awards

The giving of prizes, awards, and gifts are restricted by Regent policy.

Prizes: Prizes may only be awarded in situations where benefits are expected to accrue to UWM.

Gifts: Gifts may be given to or for the following:

- Distinguished visitors to campus;
- Foreign nationals when University personnel are visiting other countries and gifts are necessary, customary and reasonable in cost;
- To recognize contributions of time or funding support by members of the public.

Awards: Awards may be given based on competition, merit, or in recognition of service to UWM.

Note that GPR funds may not be used to purchase prizes or gifts. It is preferred that donated funds are used to purchase awards

Specific terms of grants and trust fund agreements may, in some instances, supersede these provisions. Such situations should be reviewed by the UWM Controller's Office.