WHAT'S NEW

Fall Learn over Lunch Offerings

In the upcoming months, there will be many opportunities to join with UFCE Learn over Lunch Bunch to learn about various UF compliance and ethics issues!

Florida's Public Records and Sunshine (open meetings) Laws
On **August 29**, join us to discuss the Ins and Outs of Florida's Public Records and Sunshine Laws. Whether e-mailing a co-worker, drafting a memo, or signing off on a work order, UF employees create multiple records every day. As state employees, we are subject to the Florida Public Records Law – one of the most expansive public records laws in the country. Therefore, members of the public, including the press, may request access to and obtain most of the work-related records we create or receive.

Assistant Counsel Amy Quillen, from the UF Office of the Vice President & General Counsel, will help us understand these laws and answer questions like: If I take notes at a meeting, can those notes be requested by members of the public? Are there any precautions I should take when sending work emails from personal devices (like mobile phones and computers)? And, my unit received a public records request, now what?

Professional Ethics Series
UFCE has decided to expand the traditional Compliance and Ethics Week (November 5 -11) and instead spend four consecutive weeks discussing a variety of issues related to professional ethics and how this topic relates to our work at UF.

- Our series begins on **Tuesday, October 24** with Dr. Anna Peterson, who will start out our month-long conversation by helping us understand the definition and importance of professional ethics.
- On the following two **Tuesdays, October 31** and **November 7**, Dr. Brian Ray, will walk us through the thirteen ethical dilemmas individuals face in the workplace as well as how to address these dilemmas if you or the employees you supervise ever face them.
- Finally, on **Wednesday, November 15**, Instructional Professor Bill McElroy and a panel of experts will review with us four vignettes featuring ethical scenarios that any employee might face in the workplace and how those situations might be handled. Included among the panel will be Dr. Ray and UF's Chief Compliance, Ethics & Privacy Officer, Terra DuBois.

To learn more about the Learn over Lunch series, view past sessions, and sign up for upcoming webinars please visit:

https://compliance.ufl.edu/integrity-toolbox/learn-over-lunch/

Celebrating Our Values:
Professional Ethics

Anna Peterson
Professor
Center for Adaptive Innovation, Resilience, Ethics & Science

Professional ethics is important because every professional person, in every field, will face moral conflicts that require informed, thoughtful reflection and decision-making. The process of making ethical decisions in real-world situations is generally encompassed under what philosophers call "applied" ethics. However, the language of "applying" suggests that ethical thinking is complete prior to any specific situation; when we face a real-life moral conflict, we merely have to "apply" our already-formed ethical ideas. Ethical reflection, however, requires much more than finding a handy ethical theory and depositing it onto a particular situation.

The notion of professional ethics better describes the complex process of making moral decisions in concrete situations. This is not a simple "application" of preformed ideas but rather a dynamic process that involves gathering facts, identifying the moral issues at stake, learning about the perspectives of different stakeholders, considering possible outcomes, and recognizing the uncertainty and ambiguity that are built into most morally charged situations.

In the **Ethics in the Public Sphere** program that I coordinate through **UF's Center for the Humanities and the Public Sphere**, we talk about three "pillars" of ethics: acquisition of accurate, relevant and complete information; ethical reflection; and engagement in action to meet the challenges these problems present. I think these also constitute the central dimensions of professional ethics. In order to make good decisions in our work as professionals and as citizens, we need good information, we need training in ethical reflection, and we need to know how to act constructively and effectively. These tasks require collaboration across disciplines and units, in an integrated way. I am happy that UF Compliance and Ethics supports this holistic approach to professional ethics and look forward to discussing this in the fall! *Editor's note: For more information on UFCE's professional ethics series see page 1 of this issue.*

For more information, please visit:
Ethics in the Public Sphere
https://public-ethics.humanities.ufl.edu/

UF's Center for the Humanities and the Public Sphere
https://humanities.ufl.edu/

COMPLIANCE Superstar

Stacy Beck received the Compliance and Ethics Superstar Award on July 6th, 2023. She was nominated by a colleague who shared the following with us:

"Stacy is amazingly responsive; always quick to reply and follow-up. She understands the practicalities and the legal requirements of transfers in and out of the USA. She gets to the point without making compliance a burden, which our researchers really appreciate. She has helped me with drafting terms for [Material Transfer Agreements] and explains her reasoning so we can work together to find solutions."

Stacy is a valuable member of the greater UF compliance team!

Congratulations Stacy!

Stacy Beck
Compliance Analyst II, Export Control
UF Research Integrity, Security & Compliance

THE PRIVACY ZONE

The UF Privacy Office collaborates with many other offices at UF to protect the privacy rights of students, data subjects, patients, and other individuals whose personal information is collected by UF. The definition of "Personal Information" at UF encompasses "...any information that we can use to reasonably identify you." (*https://hub.policy.ufl.edu/s/article/Online-Internet-Privacy-Statement*)   This includes the collection of Personal Information of individuals located outside of the United States.

Currently one of the most common places from which UF receives Personal Information is the European Union. The European Union General Data Protection Regulation ("EU GDPR") is the directive that governs the collection, use, maintenance and disclosure of the "Personal Data" of individuals LOCATED IN the European Union. It defines "Personal Data" very broadly as "...any information relating to an identified or identifiable natural person ('data subject') ...."

The EU GDPR provides several potential mechanisms to use in order to collect and use ("process") the Personal Data of individuals located in the European Union. At UF, the consent of the data subject is the most widely used mechanism for collecting and processing data. Examples of situations in which consent is used to collect Personal Data include research studies, student exchange programs, use of UF libraries, and contracts with organizations located in the European Union.

It is important to note that the United Kingdom has a separate General Data Protection Regulation, which essentially mirrors the EU GDPR and went into effect shortly after the UK left the European Union.

The EU GDPR also provides certain data privacy rights to data subjects, and when Personal Data is transferred to UF, UF must ensure that these data privacy rights are protected. These include:

1. Right to be informed about the details of the collection and use of Personal Data
2. Right of access to information about the processing of Personal Data
3. Right to rectification of inaccurate Personal Data
4. Right to erasure of Personal Data ("right to be forgotten")
5. Right to restrict processing of Personal Data, under certain circumstances
6. Right to data portability, which is the right to receive Personal Data in a structured, commonly used and machine-readable format and to transmit that Personal Data to another controller.
7. Right to object to the processing of Personal Data
8. Right not to be subject to automated processing of Personal Data

At this time, data subjects wishing to submit a request in connection with any of these data privacy rights may do so by sending an email to privacy@ufl.edu or calling the UF Privacy Office at (352) 294-8720.

The Privacy Office is in the process of establishing a "global privacy" program. Our goal is to provide information, resources and processes to the UF community for the collection and use of personal data starting with data governed by the EU GDPR and the UK GDPR, and then adding other countries as needed. Next, we expect to include China.

We welcome ideas, opinions, and suggestions.

As always, if you have any questions or need any information from us, please feel free to contact us at privacy@ufl.edu or (352) 294-8720.

Test Your Knowledge

Think you know about "Personal Information" and UF's Antifraud Framework?

Test your knowledge:
https://compliance.ufl.edu/integrity-toolbox/compliance-gazette/test-yourself/personal-information-and-ufs-antifraud-framework/

Making $ense From Dollars

Financial fraud in universities can present itself in various forms— embezzlement, falsification of documents, research data manipulation, student financial aid fraud, or any other deceptive activity one deliberately engages in for their personal gain.

The negative impacts of fraud extend far beyond direct financial loss. The University relies on its reputation to assure our funders, stakeholders, and the public that we can be trusted to responsibly steward our resources. When trust is eroded, it can be incredibly difficult to regain, causing potential for widespread challenges such as budget cuts and increased scrutiny demanding undue time and resources. From an institutional standpoint, it is not feasible to influence the personal pressures and rationalizations that may incline one to commit fraud. However, we as the University community can work together to strengthen our internal controls to limit the opportunity for fraud to be successfully executed.

In support of this aim, the University's Antifraud Framework has been established to provide guiding principles and structures to address fraud, waste, abuse, and financial mismanagement. A collaboration between offices of the Chief Financial Officer, Internal Audit, and Compliance and Ethics, this program bolsters a strategic focus in supporting an enterprise-scope internal controls program. Combatting fraud is the responsibility of all members of the University, and we all have a role to play in preventing, detecting, and reporting potential occurrences. To increase competence in these areas a primary step is to become familiarized with the risks and symptoms of fraud and how to report concerns.

Starting this August, new course offerings are available highlighting the importance of fraud awareness and practical strategies to match internal controls to various risks.
REVISED! PRO338 Fraud Awareness
REVISED! PRO303 Internal Controls at UF

For more information on the Antifraud Framework and related resources, check out the following:

Reporting Your Concerns:
https://compliance.ufl.edu/compliance-hotline/

Antifraud Framework:
https://www.fa.ufl.edu/directives/antifraud-framework/

UF's Antifraud Framework Presentation:
https://compliance.ufl.edu/integrity-toolbox/learn-over-lunch/

UFCE ANNOUNCEMENTS

UF Regulation and Policy Hub
Check out the new and improved *Regulation and Policy Hub*! This one-stop shop provides easy access to view UF Regulations and Policies.
https://policy.ufl.edu/

Youth Compliance & Child Abuse Reporting Policy
In the last issue of the Compliance Gazette, we shared information on the new Youth Compliance Policy, which can now be found on the UF Regulation and Policy Hub.
https://policy.ufl.edu/policy/youth-compliance/

UF | Compliance and Ethics
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Call the UF Compliance hotline:
1-877-556-5356
or click here for online reporting.