

# Compliance Matters

A Publication from the Office of Compliance and Risk Management



## Leap and the Net Will Appear: New Global Support for Research, Academic and Other Activities Outside New York

It is not often that a compliance article begins with a zen-like saying (zen-like because the zen apparent quote is attributable to John Burroughs, the American naturalist). But the saying is an apt description of the reassurance NYU's new Global Support seeks to provide. As its name suggests, Global Support assists the NYU community (faculty, researchers and administrators) plan and conduct global activities, including research, academic activities, trips, travel, collaborations with international partners, exchange programs, study-away programs, work within the global network, etc.

Global in this context is defined to include any location outside of New York, from DC and other U.S. states to other countries. This article describes the Global Support safety net, encouraging you to look before you leap.

All of the activities noted above may give rise to potential operational and compliance issues that need first to be recognized, and then addressed. Different departments and individuals across the University have functional responsibility and expertise to address their own piece of the puzzle.

In our decentralized University, Global Support attempts to fulfill a growing need for a centralized source of information with a single point of contact, gathering together resources that already exist in disparate places and helping those engaging in global activities get the advice and support they need.

Global Support offers a two-fold approach:

- First, the recently launched [Global Support website](#) -- to which many University departments have contributed content that will be updated on an ongoing basis -- which provides a consolidated point of access for information, resources and contacts about global activities and the potential compliance and operational issues that may arise;
- Second, a concierge-like service is available at 212-992-5650, or email at [global.support@nyu.edu](mailto:global.support@nyu.edu) to answer questions, address matters not covered on the website, and assist with more complicated global activities.

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# Global Support (continued from page 1)

## *The Global Support Website*

Currently housed under the “University Life” section of NYU’s website, the Global Support website can be found at [www.nyu.edu/life/global-support.html](http://www.nyu.edu/life/global-support.html).

It navigates the visitor to the following links, and beyond to other internal links:

- *Getting Started*  
Describes the different types of global activities and identifies key points of contacts and processes for each type of activity.
- *Traveling Globally*  
Focuses on travel related issues, including NYU Traveler, visas, immigration and other travel requirements, health and travel insurance, traveling with technology, student travel and risks and releases.
- *Making and Receiving Payments Globally*  
Provides information on opening bank accounts in countries outside the U.S., making global payments, entering into contracts and global tax implications.
- *Working and Hiring Globally*  
Addresses global assignments for NYU employees, hiring employees, consultants and independent contractors in countries outside the U.S. and receiving services through a third party entity.
- *Establishing Global Academic Programs or Projects*  
Involves operating outside of New York, working with partner institutions, leasing or buying property overseas and obtaining liability insurance.
- *Global Regulatory Issues*  
Includes U.S. Trade Sanctions and Export Controls laws affecting Universities, working with foreign Government officials, data privacy and other applicable laws of other countries.

## *Global Support Concierge Services*

A walk through the site underscores the complexity and multiplicity of the potential issues associated with global activities. The website is a starting point lighting the path forward. Most important is awareness of potential issues and planning ahead so they can be addressed by those departments and individuals with the requisite expertise. The website is not a substitute for seeking guidance on specific matters.

Any inquiries not addressed by the Global Support website may be made by phone – 212-992-5650 -- or email at [global.support@nyu.edu](mailto:global.support@nyu.edu) or through the [website](#). The team responding to these inquiries will help obtain answers to specific questions, structure activities to meet research and academic program goals while minimizing risk and connect those making the inquiries with the appropriate departments or individuals for guidance and support.

## *Feedback and Furthering the Academic Mission*

Global Support welcomes your feedback on the website and process. It bears emphasizing that -- as with all matters of compliance -- the goal remains to facilitate the activities that members of the University community seek to pursue, to build bridges, not walls. It takes a leap of faith, but the net will appear.

Visit the [Global Support](#) website for more information.



# Compliance and Risk Reporting Line

One of the key elements of NYU's Compliance Program is its reporting mechanisms. There are a variety of methods for employees to report potential problems, raise concerns, or simply ask questions.

If you have questions regarding *Code of Ethical Conduct* violations, financial or business integrity issues, conflicts of interest, or if you observe conduct at NYU that is inconsistent with our expectations of an ethical learning and working environment, the University encourages you to seek guidance. You may want to speak directly with a supervisor, Human Resources Officer, the Office of General Counsel or the Office of Compliance and Risk Management.

Employees are also encouraged to call the Compliance and Risk Reporting Line ("Reporting Line") through a toll free number — **877-360-7626** — or make an inquiry through the Reporting Line Website at [www.nyu.edu/reportingline](http://www.nyu.edu/reportingline). The phone line and website are operated twenty-four hours a day, seven days a week. An independent third party, NAVEX Global, administers NYU's Reporting Line and website on behalf of NYU.

Operators answering the calls are available 24 hours a day, seven days a week, and are trained in making callers feel at ease and gathering information that will enable the University to fully investigate the issues raised. The Reporting Line and website system allow an individual to follow up, either by telephone or web, to obtain status updates. Status updates can be accessed by using passwords related to the specific complaint.

Callers may choose to remain anonymous but must provide sufficient information about the nature of the conduct that raised their concern, and the participants in that conduct, to enable us to undertake an investigation. Reports submitted via the Reporting Line will be forwarded to the Chief Global Compliance Officer for review in a timely manner and as discreetly as possible.

For more information about the Reporting Line please visit [www.nyu.edu/reportingline](http://www.nyu.edu/reportingline), or email the Office of Compliance and Risk Management at [NYUCompliance@nyu.edu](mailto:NYUCompliance@nyu.edu). We are here to help.

## NYU's Global Travel Program

Whether you travel for work, assist NYU colleagues to arrange their professional travel, or travel privately, NYU offers a Travel Program to facilitate easy and stress-free travel and travel arranging.

The NYU Global Travel Team is pleased to highlight the value added services and preferred vendors that make up the NYU Global Travel Program:

- Egencia is NYU's preferred online travel booking tool.
- Discounted airfare on Delta Air Lines, Etihad Airways, and United Airlines with NYU negotiated fares.
- NYU has negotiated rates with hotels in NYC and NYU campus cities.
- Car rentals - NYU has corporate discount agreements with Avis/Budget and National/Enterprise.
- Car service - NYU has negotiated discount with Carey/Embarque and Executive Transportation Group.
- Amtrak - discount on Acela Express service ranging from 5-20%.

[Visit NYU Traveler](#) to book your travel and for more details on these new change to NYU's Global Travel Program.



## Receive an Administrator Conflict of Interest Disclosure? Here's What You Need To Know

As part of NYU's annual Conflict of Interest Disclosure process, your respective Dean or Senior Executive may have designated you to complete a conflict of interest disclosure form. The Office of Compliance and Risk Management manages this process and sends out the disclosure forms, distributed through NYU's Qualtrics Survey.

The reporting period for this disclosure form is *September 1, 2015 through August 31, 2016*. In addition to this look back period, the form also asks about any disclosures you may have to make subsequent to this reporting period.

If you do receive a disclosure form, please take a few moments to complete it—January 9, 2017 is the due date. We thank you in advance for your cooperation with this process. Should you have any questions or concerns, please do not hesitate to contact Jessica Wasserman in the Office of Compliance and Risk Management, at 212-992-8348, or by email at [jessica.wasserman@nyu.edu](mailto:jessica.wasserman@nyu.edu).



For more information on Conflict of Interest Disclosures, please see [Compliance Matters](#), Volume 4, Issue 2.

## Policy Post– Highlighting New and Revised University Policies

A goal of the Office of Compliance and Risk Management is to bring awareness to the NYU community about new and updated university-wide policies and guidelines. These policies can be located on the University Policy website at [nyu.edu/policies](http://nyu.edu/policies).

In this issue, we highlight three new Public Safety policies that apply to all employees at NYU:

**[Reporting Violent Felony Offenses Policy](#):** The purpose of this Policy is to set forth rules and procedures to be followed in the event that a violent felony offense on campus or in facilities owned or controlled by the University is reported.

**[Weapons and Simulated Weapons Policy](#):** This Policy supersedes the former *Weapons, Simulated Weapons, and Theatrical Use of Weapons Policy*. This policy sets forth rules governing the possession of weapons and simulated weapons in and around premises owned or controlled by NYU and at NYU sponsored events in other locations.

**[Theatrical Use of Simulated Weapons Policy](#):** This Policy also supersedes the former *Weapons, Simulated Weapons, and Theatrical Use of Weapons Policy*. This policy sets forth rules governing the possession of simulated firearms and other simulated weapons at NYU for theatrical use in activities sponsored and/or authorized by NYU, including use in NYU stage and film productions.

*Compliance Matters* provides updates about important compliance issues covering new regulations, new and updated University Policies, and risk management.

We welcome feedback and suggestions from the NYU Community for articles in future issues. Please send your ideas or submissions to Diane Delaney, Associate Compliance Officer, at [diane.delaney@nyu.edu](mailto:diane.delaney@nyu.edu) or Rachna Vaid, Deputy Compliance Officer, at [rachna.vaid@nyu.edu](mailto:rachna.vaid@nyu.edu).