



## 2010 Ethics & Compliance Culture Survey

### Background

From November 17 to December 10, 2010, the Office of University Compliance conducted an anonymous survey to evaluate the current ethics and compliance culture at VCU. The results from this initial survey will be used as a benchmark for future surveys to be conducted annually. The survey will serve as a mechanism to identify opportunities to strengthen the ethics and compliance culture and as one measure of the compliance program's progress. The survey was distributed to all university employees, including hourly and student employees. Of the 10,499 university employees, 1,660 employees (16%) responded. The following summary highlights key responses. The survey results and a selection of the respondents' comments are attached.

### Strengths

The survey revealed high familiarity with the VCU Code of Ethics (71%) and the majority of respondents felt that employees (77%) and employees in leadership positions (70%) at VCU demonstrate integrity and ethical behavior. Furthermore, the majority of employees (74%) reported knowing where to find information on policies and procedures.

As part of this survey, we wanted to assess whether employees felt comfortable raising concerns through various channels available at the university. The majority of employees felt comfortable reporting incidents or concerns to their supervisor (68% agreed, 21% disagreed and 12% were neutral). When asked if they felt protected from retaliation when reporting to their supervisor the majority agreed, but with a slight reduction (61% agreed, 25% disagreed and 13% were neutral). The responses were similar when the employees were asked if they would feel protected from retaliation if they reported compliance violations to a central office (61% agreed, 23% disagreed and 16% were neutral). Employees felt most protected from retaliation when using the VCU Helpline (64% agreed, 17% disagreed and 18% were neutral).

Employees were asked if they had experienced or observed a violation of laws, regulations, or university policy within the last 12 months. The majority (72%) reported no (15% not sure, 13% yes) and an even greater majority (93%) reported not being asked to bend, break or circumvent laws, regulations and/or university policies.

### Opportunities

The survey results showed a lower familiarity with the Office of University Compliance (37%), the VCU Helpline (48%) and other compliance related policies (47%). The majority of employees reported knowing where to find information on policies and procedures, but when asked if the responder believed that most employees "know" the laws, regulations and university policies, responses showed a greater distribution with slightly more than half agreeing (52%).

Of the employees who either experienced bullying; observed a violation of laws, regulations or university policy; or were asked to bend, break or circumvent laws, regulations and/or university policies 2 of 3 (67%) did not report the concern. Of those who provided comments on why they did not report their concerns, the vast majority cited fear of retaliation as the reason they declined to do so. We have listed a sample of those responses in the attached survey detail.

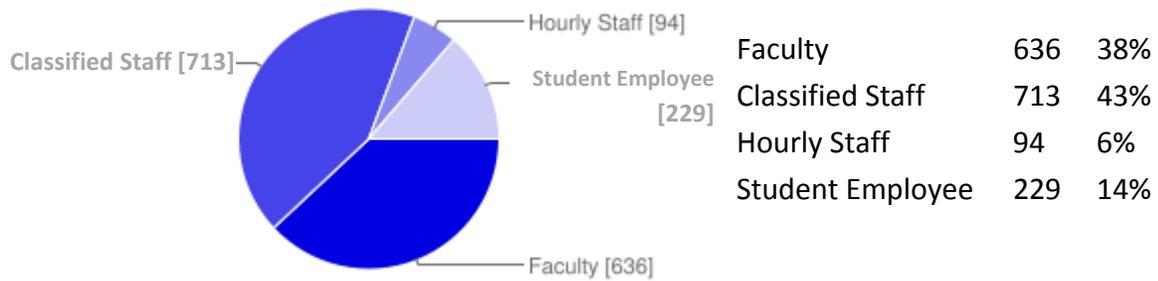
## **Response to Survey**

The Office of University Compliance began developing a two-year communication plan prior to release of the survey. The survey results further support our need for a communication plan and we will focus on implementing this plan during 2011 to raise awareness of the Compliance Office, the VCU Helpline and compliance related policies.

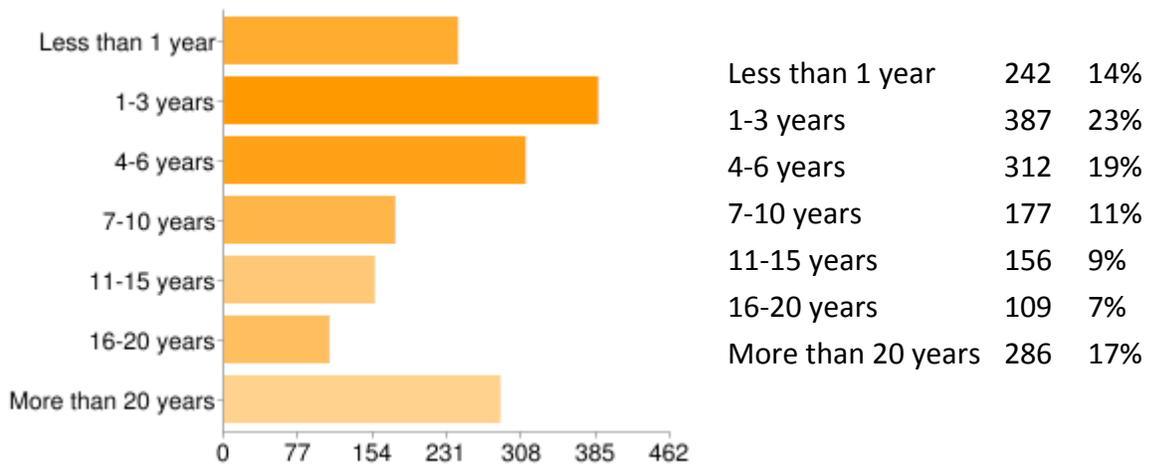
While the majority of employees agreed they felt protected from retaliation when reporting concerns, almost 1 in 4 reported that they did not feel protected if reporting to a supervisor or central office. Additionally, almost 1 in 4 employees reported experiencing or observing bullying by a supervisor. Senior leadership must continue to communicate, through words and actions, that retaliation and bullying will not be tolerated; and take swift, strong and consistent disciplinary actions when retaliation or bullying is identified.

## Summary of Responses

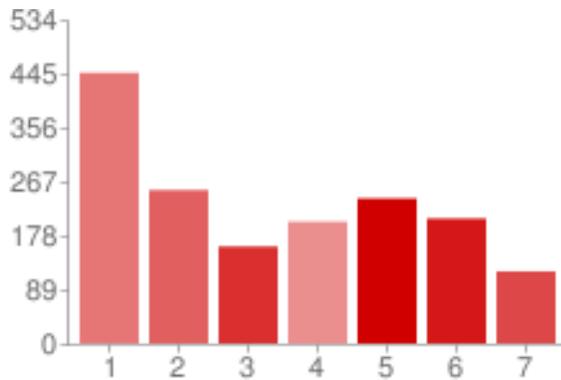
### 1. The following best describes my job title or job duties:



### 2. How long have you been employed by VCU?

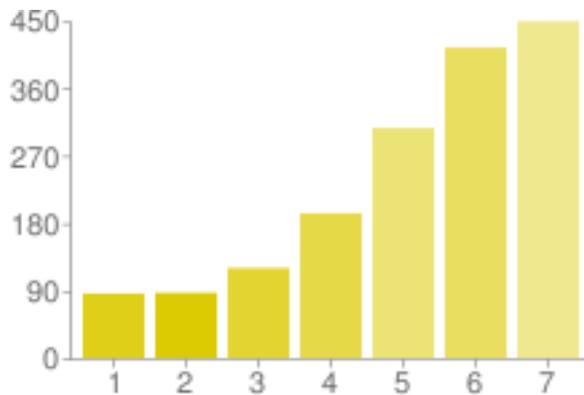


**3. How familiar are you with the Office of University Compliance?**



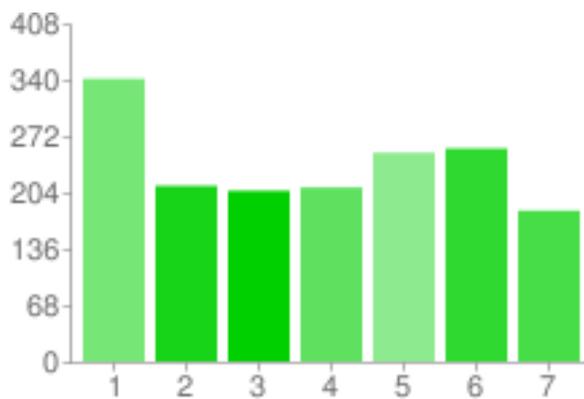
1 - Not at all familiar	446	27%
2	253	16%
3	160	10%
4	201	12%
5	239	15%
6	206	13%
7 - Very familiar	119	7%

**4. How familiar are you with the VCU Code of Ethics?**



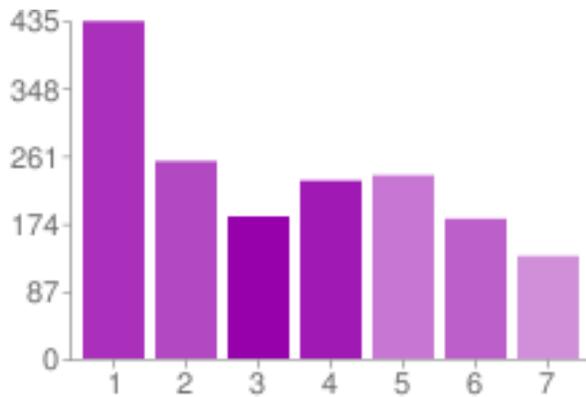
1 - Not at all familiar	86	5%
2	87	5%
3	120	7%
4	193	12%
5	307	19%
6	414	25%
7 - Very familiar	449	27%

**5. How familiar are you with the VCU Code of Conduct for Business Practices?**



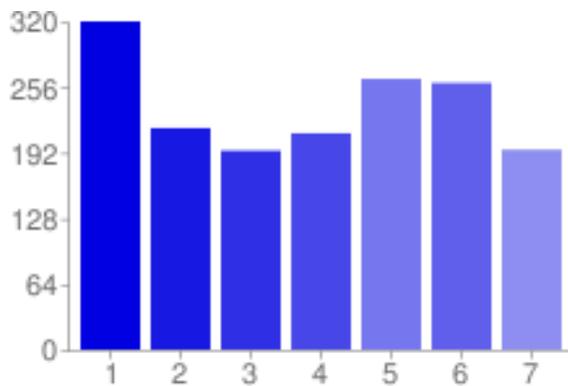
1 - Not at all familiar	341	21%
2	212	13%
3	206	12%
4	210	13%
5	252	15%
6	257	15%
7 - Very familiar	182	11%

**6. How familiar are you with the VCU Creed?**



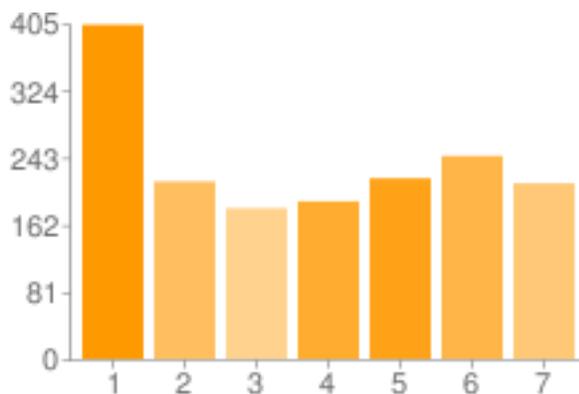
1 - Not at all familiar	434	26%
2	254	15%
3	183	11%
4	229	14%
5	236	14%
6	180	11%
7 - Very familiar	132	8%

**7. How familiar are you with VCU's policy for Reporting Suspected University-related Misconduct/Noncompliance and Protection from Retaliation?**



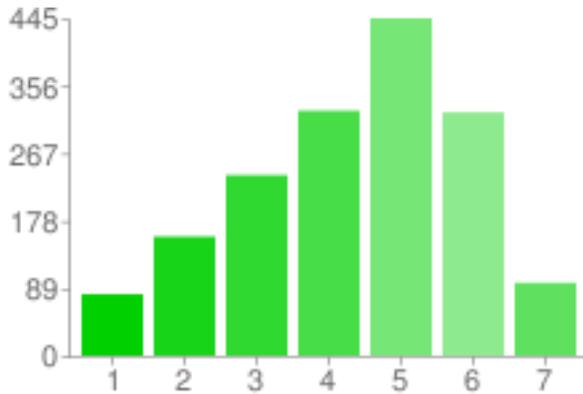
1 - Not at all familiar	320	19%
2	216	13%
3	194	12%
4	211	13%
5	264	16%
6	260	16%
7 - Very familiar	195	12%

**8. How familiar are you with the VCU Helpline for anonymously reporting compliance concerns?**



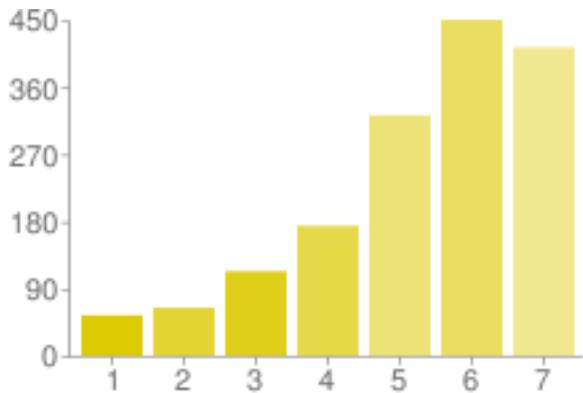
1 - Not at all familiar	403	24%
2	214	13%
3	182	11%
4	190	11%
5	218	13%
6	245	15%
7 - Very familiar	212	13%

**9. I believe that most employees at VCU know the laws, regulations and university policies that they are required to follow.**



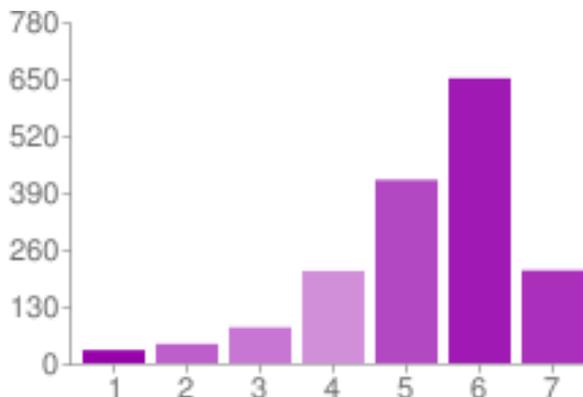
1 - Strongly disagree	81	5%
2	157	9%
3	238	14%
4	323	19%
5	445	27%
6	321	19%
7 - Strongly agree	96	6%

**10. I know where to find information on policies and procedures at VCU.**



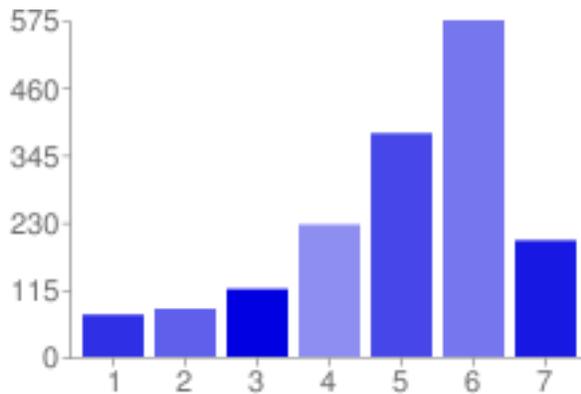
1 - Strongly disagree	54	3%
2	64	4%
3	113	7%
4	174	11%
5	322	20%
6	450	28%
7 - Strongly agree	413	26%

**11. I believe that most employees at VCU demonstrate integrity and ethical behavior.**



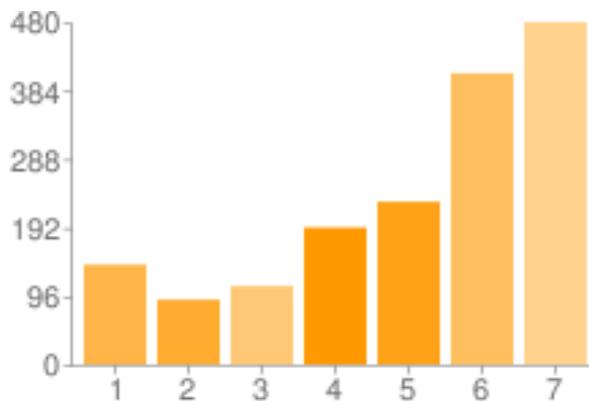
1 - Strongly disagree	30	2%
2	44	3%
3	82	5%
4	211	13%
5	419	25%
6	651	39%
7 - Strongly agree	212	13%

**12. I believe that most employees in leadership positions at VCU demonstrate integrity and ethical behavior.**



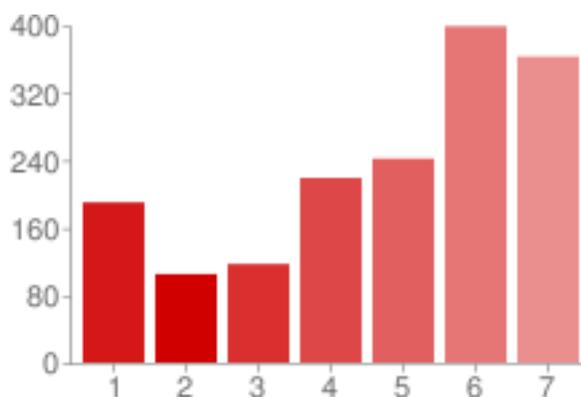
1 - Strongly disagree	72	4%
2	82	5%
3	116	7%
4	226	14%
5	382	23%
6	575	35%
7 - Strongly agree	199	12%

**13. I feel comfortable reporting incidents or concerns of noncompliance to my supervisor.**



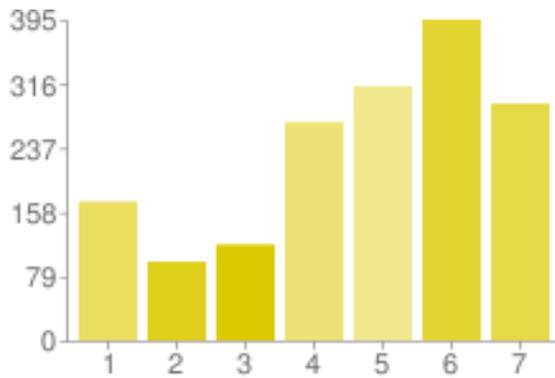
1 - Strongly disagree	140	8%
2	91	6%
3	110	7%
4	192	12%
5	228	14%
6	408	25%
7 - Strongly agree	480	29%

**14. I feel that I would be protected from retaliation if I report a suspected compliance violation to my supervisor.**



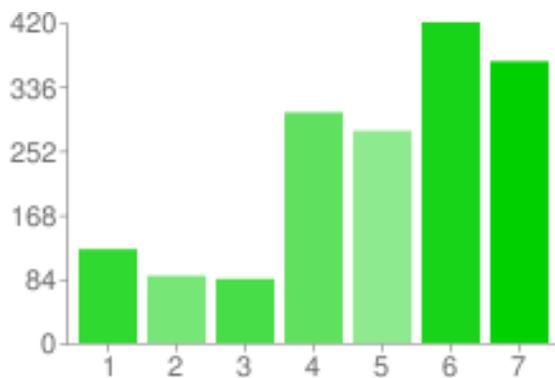
1 - Strongly disagree	190	12%
2	105	6%
3	117	7%
4	219	13%
5	242	15%
6	399	24%
7 - Strongly agree	363	22%

**15. I feel that I would be protected from retaliation if I report a suspected compliance violation to a central office (e.g., Human Resources, EEO, Procurement, etc.).**



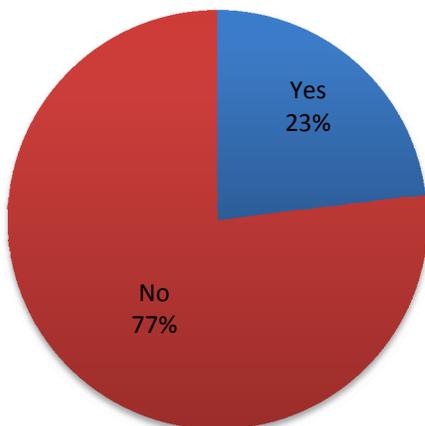
1 - Strongly disagree	171	10%
2	97	6%
3	118	7%
4	269	16%
5	313	19%
6	395	24%
7 - Strongly agree	292	18%

**16. I feel that I would be protected from retaliation if I report a suspected compliance violation through the VCU Helpline.**



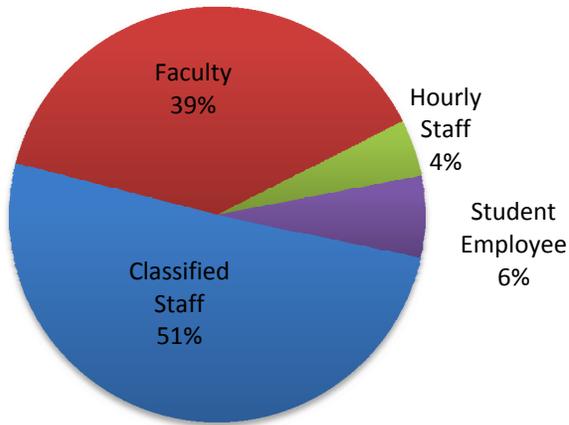
1 - Strongly disagree	123	7%
2	88	5%
3	84	5%
4	302	18%
5	278	17%
6	420	25%
7 - Strongly agree	369	22%

**17. I have experienced or observed bullying in the workplace by a supervisor within the last 12 months.**

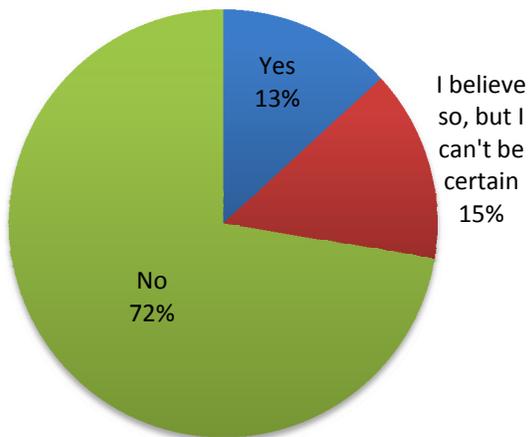


Yes	369	23%
No	1231	77%

Below is a breakdown of “yes” responses by employee type.

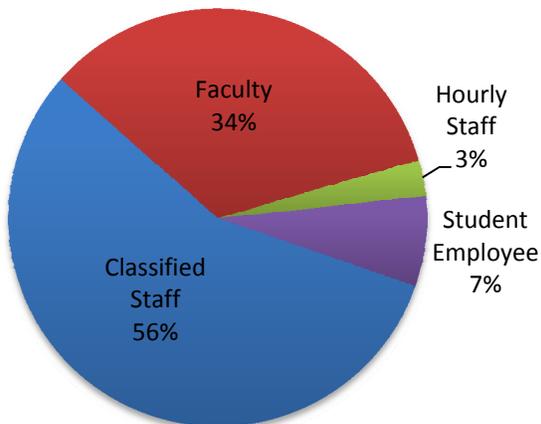


**18. I have experienced or observed a violation of laws, regulations or university policy in my office/department within the last 12 months.**

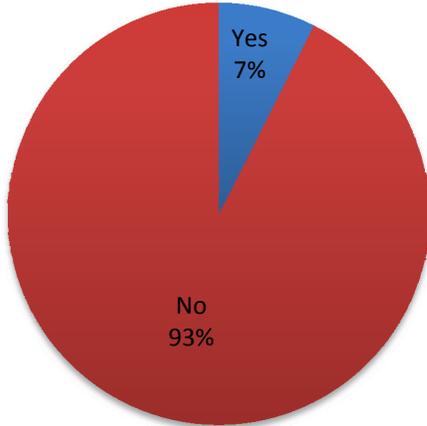


Yes	218	13%
I believe so, but I can't be certain	239	15%
No	1198	72%

Below is a breakdown of “yes” responses by employee type.

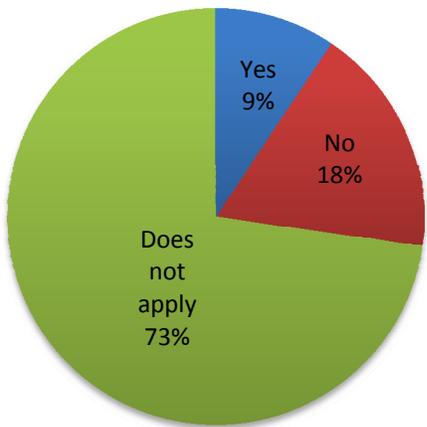


19. I was asked to bend, break or circumvent laws, regulations and/or university policies during the last 12 months by someone in my department.



Yes	124	7%
No	1538	93%

20. If you replied "yes" to any of the above three questions, did you report your concern?



Yes	152	9%
No	288	18%
Does not apply	1175	73%

**Selected written responses for “Do you have any comments or concerns about ethics and compliance at VCU?”**

Kudos	Criticisms
<p>I have faith that Dr. Rao is working in the best interests of this university. Since Dr. Rao became President, there has been more attention to problems of bullying and discrimination than ever before. I believe that he is addressing these problems from the top down, as they need to be.</p>	<p>It is clear that department chairs and administrative staff, including those who are also faculty, must be trained in the rules and regulations, as well as trained how to be a manager of people and how to do that ethically and appropriately. Poor leaders, lead to unhappy staff/faculty, which leads to poor decisions and desperation among all.</p>
<p>I think the Office of Compliance is doing a great job. The matters your office deals with can be extremely difficult and stressful for all concerned.</p>	<p>I strongly believe that there are employees who feel they are above rules and regulations. These are the most difficult to deal with, especially when they're not held accountable for their actions. Generally speaking, I work with some of the greatest people around.</p>
<p>I believe that compared to other places of business where I have worked, VCU makes a commendable effort to address compliance concerns and increase awareness of compliance issues on campus.</p>	<p>Supervisors and managers talk about ethics, but their actions are quite different. Supervisors and managers are not held to the same standards as employees. Supervisors at VCU lack critical supervisory training. Supervisors bully employees and nothing is done. This was reflected in the "bullying" survey that was conducted. Management at VCU is fully aware of the results of that survey.</p>

**Selected written responses for “If you replied ‘yes’ to any of the above three questions, did you report your concern?”**

Retaliation	Bullying
<p>Because I do not trust the leadership and feel that there would be retaliation.</p>	<p>No clear policies or guidance on bullying.</p>
<p>History at my school has shown that there is no interest in fixing the problem, any problem will be handled inappropriately, and retaliation will fall upon those who report problems.</p>	<p>Because the person doing the bullying is a supervisor and past attempts by others to rectify this with that person's supervisor have been futile.</p>
<p>Fear that reporting such incidents would "tarnish" my name and limit future promotional opportunities within VCU. Certain administrative offices (high administrative offices) have been known to hold grudges and I've seen it first-hand. I need job security for my family.</p>	<p>The person doing the bullying was my supervisor. I would have lost my job, and I actually did, once I spoke up for myself.</p>