
INTEGRITY & COMPLIANCE CULTURE SURVEY

The Integrity and Compliance Office conducted a culture survey focused on integrity and compliance in March 2015. The purpose was to assess the university community's awareness of certain resources and programs and overall attitude toward integrity, compliance, and raising concerns in the workplace. The survey serves as one mechanism to identify opportunities to strengthen our ethics and compliance culture and provides a measure of the compliance program's effectiveness and progress. This survey is conducted biennially as one measure that permits continual assessment of the culture of integrity and compliance.

Initially, this survey was conducted in 2010, again in late 2012, and most recently in early 2015. This report offers a summary of the 2015 survey results and benchmarking with the 2010 and 2012 survey results.

The survey data reveals a 20% participation increase this year with a total of 2,522 employees responding. This is most likely attributable to a workforce supportive of a compliant culture recognizing the benefit for a survey of this type and reiterated by a sense of urgency conveyed with shorter response timeframe. Additionally, an incentive for a chance to be one of five individuals to win a prize was offered.

Overview

Overall, there is an increased awareness of the Integrity and Compliance Office, VCU policies and procedures, and reporting mechanisms. Approximately 84% of respondents felt most employees at VCU demonstrate integrity and ethical behavior in performance of their job duties, which is consistent with the 2010 and 2012 survey data. Seventy-nine percent reported that leadership at VCU demonstrated integrity and ethical behavior, a decrease of 1% from 2012 and an increase of 3% from the 2010 survey.

The percentage of respondents who experienced or observed a policy violation decreased slightly, by 2% (a 5% decrease from 2010), accompanied by a 10% increase in reporting those experiences and observations (an increase of 18% from 2010). The belief that the issue would not be addressed or taken seriously was cited as the top reason employees chose not to report their concerns (29% of respondents who experienced or observed a policy violation). Other reasons include fear of retaliation by a supervisor/management (21%) or management was already aware of the concern (11%).

At the conclusion of the survey, respondents had the option of submitting general comments about the overall culture of compliance at VCU. Twenty-two percent of feedback was exclusively positive. Twenty-five percent expressed concern that higher level employees do not adhere to policy and our ethical standards, and are not held accountable for their actions. Sixteen percent suggested implementing additional training and outreach concerning integrity and compliance topics—generally for those in a supervisory role and to include civility.

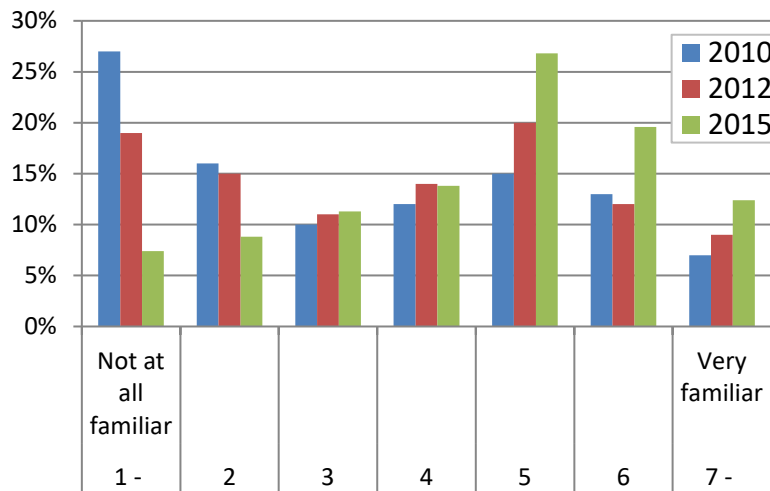
The following pages contain detailed information and conclusions in the following subcategories:

- Familiarity with Integrity and Compliance related resources
- Familiarity with VCU’s policies
- Perceptions of integrity and compliance in the workplace
- Comfort with reporting concerns or incidents of non-compliance
- Observation of misconduct¹
- Reporting misconduct

Familiarity with Integrity and Compliance Resources

The Integrity and Compliance Office (ICO) serves as a resource to the university community, providing guidance and tools such as the VCU Code of Conduct, Policy Library and VCU Helpline. The following questions were posed to measure familiarity with these resources and help determine where to focus ICO awareness and education efforts.

How familiar are you with the Integrity and Compliance Office? ²

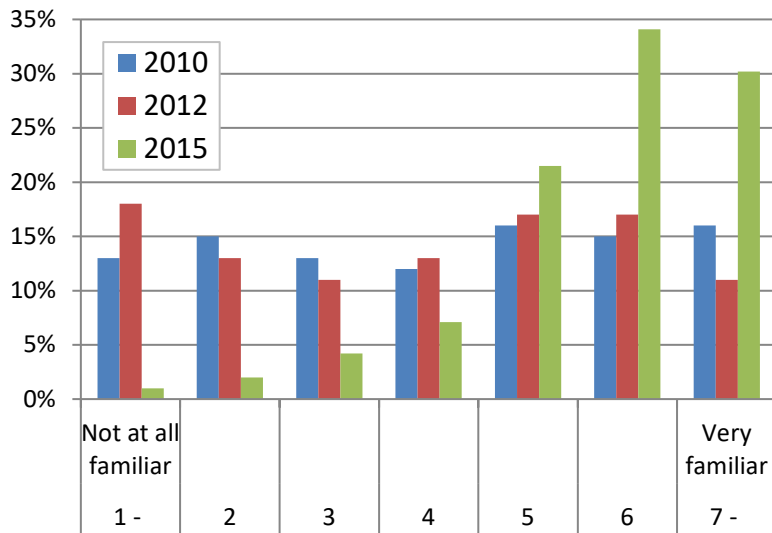


	2010	2012	2015	Δ
1 - Not at all familiar	27%	19%	7%	12%
2	16%	15%	9%	6%
3	10%	11%	11%	0%
4	12%	14%	14%	0%
5	15%	20%	27%	7%
6	13%	12%	20%	8%
7 - Very familiar	7%	9%	12%	3%

¹ Misconduct is defined as failure to meet expectations. Expectations are set by laws, regulations and VCU’s policies.

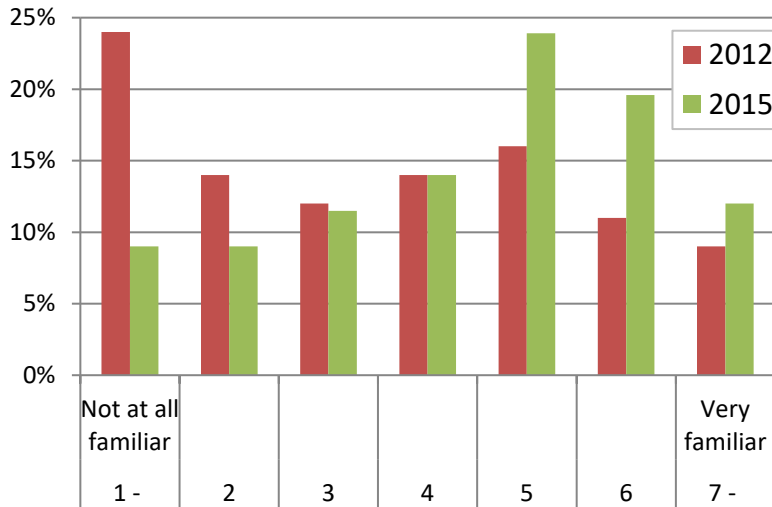
² A percentage value appearing in red text in the change column indicates a decrease in change from the 2012 survey.

How familiar are you with the VCU Code of Conduct (which contains our Ethical Standards)?³



	2010	2012	2015	Δ
1 - Not at all familiar	13%	18%	1%	17%
2	15%	13%	2%	11%
3	13%	11%	4%	7%
4	12%	13%	7%	6%
5	16%	17%	22%	5%
6	15%	17%	34%	17%
7 - Very familiar	16%	11%	30%	19%

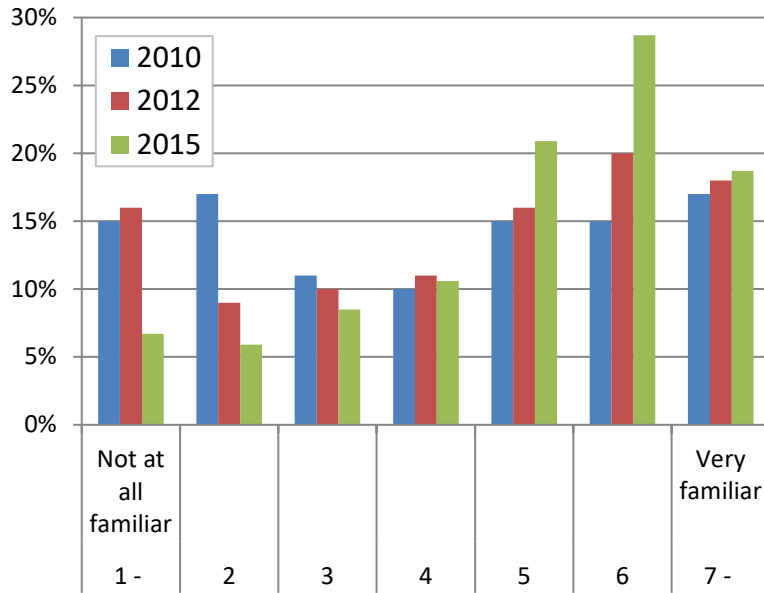
How familiar are you with the VCU Policy Library?



	2012	2015	Δ
1 - Not at all familiar	24%	9%	15%
2	14%	9%	5%
3	12%	12%	0%
4	14%	14%	0%
5	16%	24%	8%
6	11%	20%	9%
7 - Very familiar	9%	12%	3%

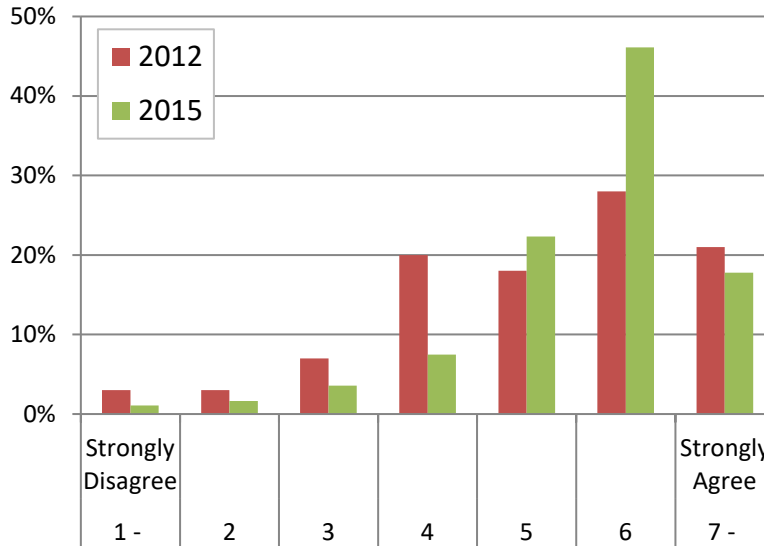
³ The 2010 and 2012 survey question referred to the “Code of Conduct for Business Practices” as the VCU Code of Conduct was not in use during the survey period.

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



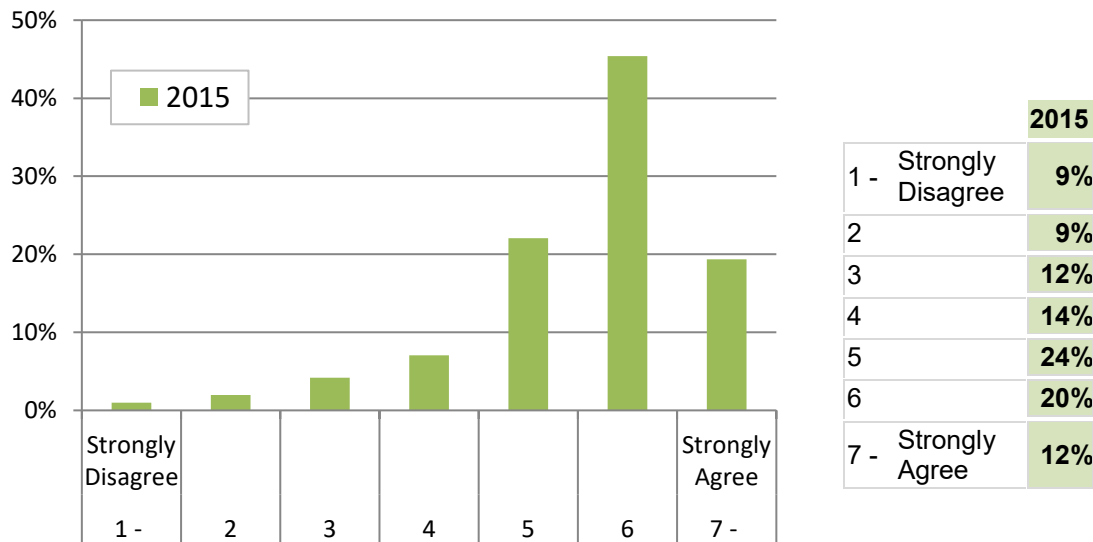
	2010	2012	2015	Δ
1 - Not at all familiar	15%	16%	7%	9%
2	17%	9%	6%	3%
3	11%	10%	9%	2%
4	10%	11%	11%	0%
5	15%	16%	21%	5%
6	15%	20%	29%	9%
7 - Very familiar	17%	18%	19%	1%

As a supervisor, or other leadership role, I know where I can find resources to assist me in developing appropriate ethical and compliant behavior in my employees.



	2012	2015	Δ
1 - Strongly Disagree	3%	9%	15%
2	3%	9%	5%
3	7%	12%	0%
4	20%	14%	0%
5	18%	24%	8%
6	28%	20%	9%
7 - Strongly Agree	21%	12%	3%

As a supervisor, I know where I can find resources to assist me in appropriately responding to and addressing reported compliance and ethical concerns.



Conclusion

Overall, there is an 18% increase in familiarity with the ICO, a 20% increase in familiarity with the Policy Library, and a 15% increase in familiarity with the VCU Helpline. Familiarity with the *VCU Code of Conduct* increased 41%; however, it is worth noting that in prior years, this question referred to the *VCU Code of Conduct for Business Practices*, which was retired in 2013 after being replaced with the current code.

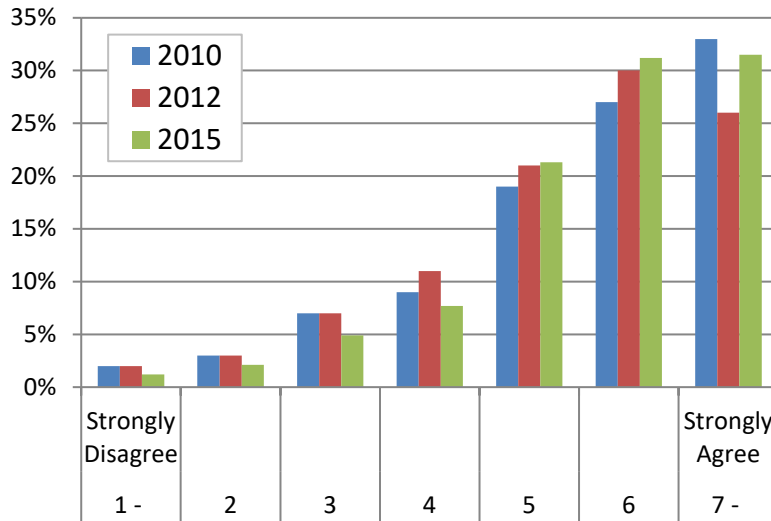
The overall increase in familiarity is most likely attributable to increased education as a part of the ICO’s awareness initiatives, which included poster mailers and postcards to all employees, training presentations, compliance week activities, informational tables at VCU sponsored events, and joining several collaborative committees and workgroups.⁴

Familiarity with Policies

Respondents were asked if they know where to find policies and procedures and what their familiarity is with policies promoting a civil and professional working environment. The purpose of this inquiry is to evaluate the accessibility of information employees need in order to perform their work in compliance with VCU expectations.

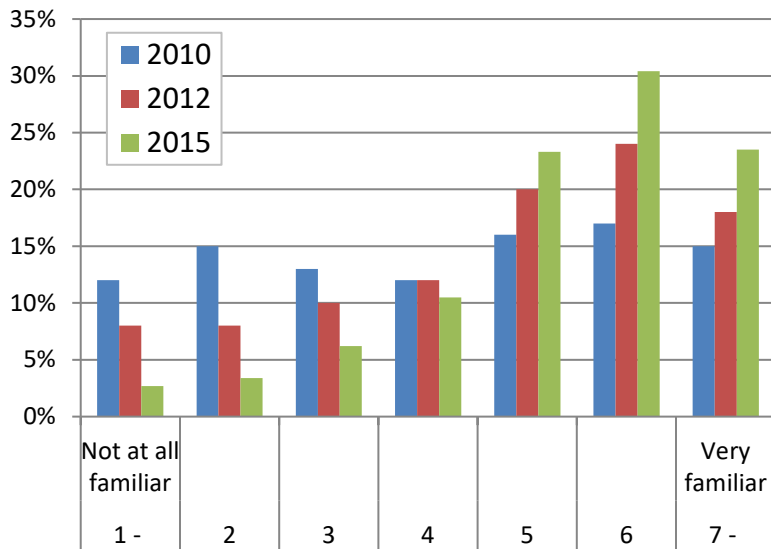
⁴ This list is not exhaustive.

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



	2010	2012	2015	Δ
1 - Strongly Disagree	2%	2%	1%	1%
2	3%	3%	2%	1%
3	7%	7%	5%	2%
4	9%	11%	8%	3%
5	19%	21%	21%	0%
6	27%	30%	31%	1%
7 - Strongly Agree	33%	26%	32%	6%

How familiar are you with VCU's policies promoting an ethical culture, a civil and professional working environment, and anti-retaliation for reporting concerns?



	2010	2012	2015	Δ
1 - Not at all familiar	12%	8%	3%	5%
2	15%	8%	3%	5%
3	13%	10%	6%	4%
4	12%	12%	11%	2%
5	16%	20%	23%	3%
6	17%	24%	30%	6%
7 - Very familiar	15%	18%	24%	6%

Conclusion

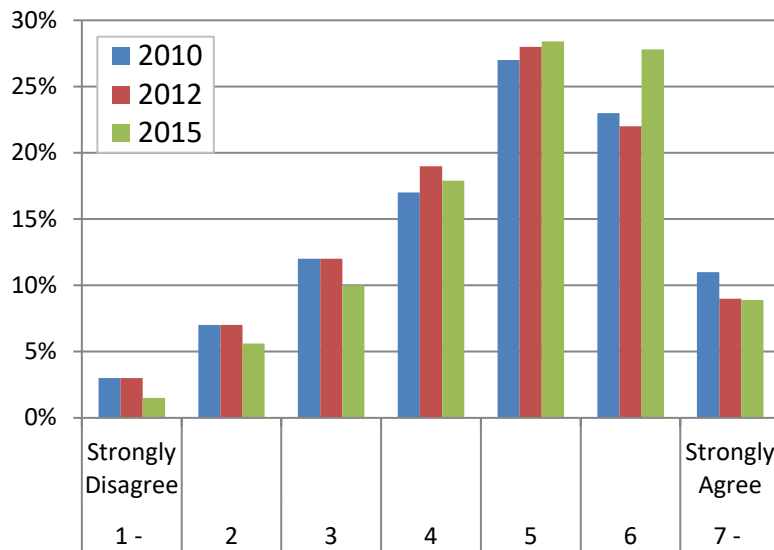
Sixteen percent of employees reported having challenges with where to find policies in contrast to 23% in 2012. Reflecting this trend, familiarity with the Policy Library grew from 36% in 2012 to 56% this year. The expectation is that this metric will continue to increase over the next several years as the Policy Program is further developed, promoted, and utilized.

Complimentary to this finding, there was also a 15% increase from the 2012 survey (and a 29% increase from 2010) in familiarity with policies promoting a civil and professional working environment. This may be attributable to the President and Provost’s consistent messaging related to this topic serving as reiteration of VCU’s expectations.

Perceptions of Integrity and Compliance in the Workplace

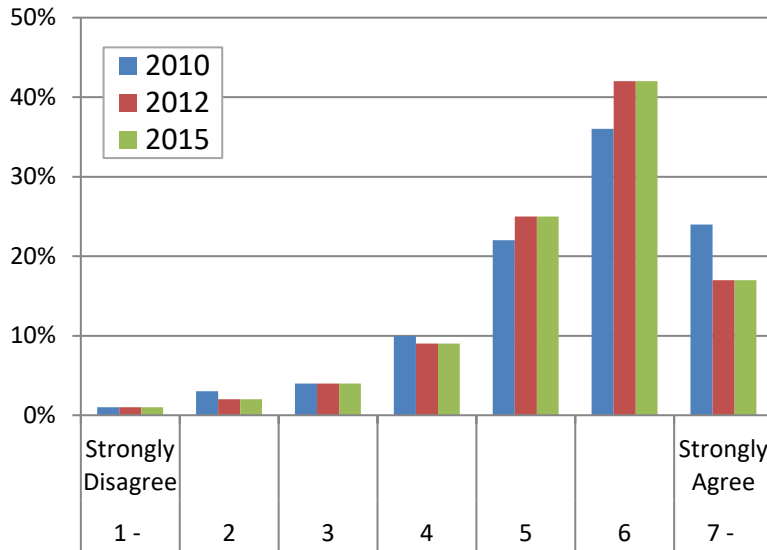
The following questions were included in the survey to measure ethical perceptions of both peers and those in leadership roles.

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



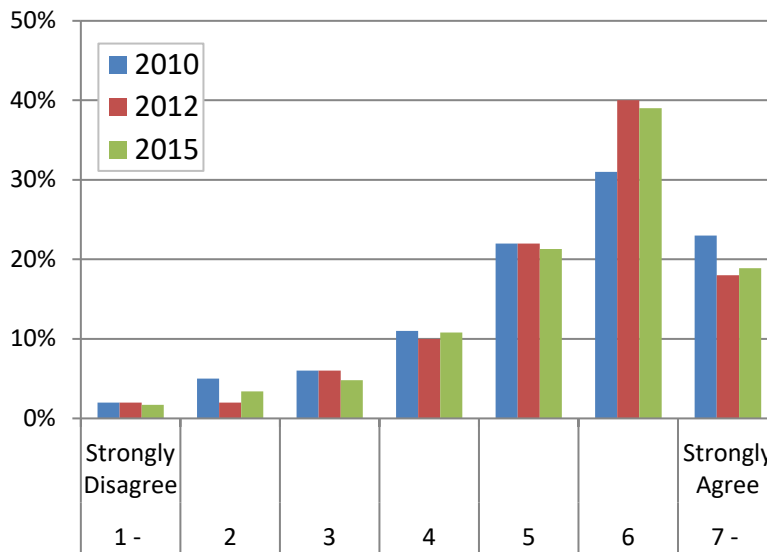
	2010	2012	2015	Δ
1 - Strongly Disagree	3%	3%	2%	2%
2	7%	7%	6%	1%
3	12%	12%	10%	2%
4	17%	19%	18%	1%
5	27%	28%	28%	0%
6	23%	22%	28%	6%
7 - Strongly Agree	11%	9%	9%	0%

I believe that most employees at VCU demonstrate integrity and ethical behavior in performance of their job duties.



	2010	2012	2015	Δ
1 - Strongly Disagree	1%	1%	1%	1%
2	3%	2%	2%	1%
3	4%	4%	4%	2%
4	10%	9%	9%	3%
5	22%	25%	25%	0%
6	36%	42%	42%	1%
7 - Strongly Agree	24%	17%	17%	6%

I believe that most employees in leadership positions at VCU demonstrate integrity and ethical behavior in performance of their job duties.



	2010	2012	2015	Δ
1 - Strongly Disagree	2%	2%	2%	0%
2	5%	2%	3%	1%
3	6%	6%	5%	1%
4	11%	10%	11%	1%
5	22%	22%	21%	1%
6	31%	40%	39%	1%
7 - Strongly Agree	23%	18%	19%	1%

Conclusion

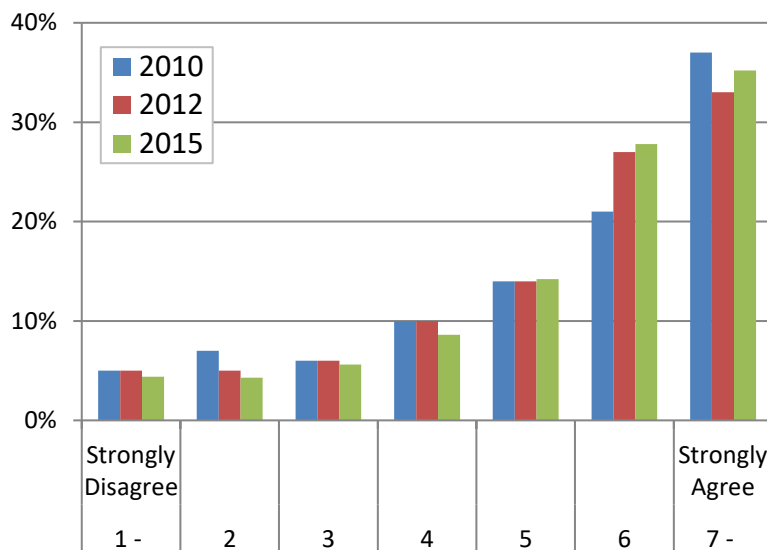
With an increase of 6% from the 2012 survey, the 2015 data demonstrates respondents are in agreement that most employees know the laws, regulations, and policies they are required to follow. This is bolstered by a 7% increase in agreement that most employees demonstrate integrity and ethical behavior in the workplace. Interestingly, that while only 65% of respondents agreed that most employees know the policies that they are required to follow, 84% of respondents agreed that they know where to find the policies that apply to their position. This suggests that employees may express over-confidence of their policy knowledge and under-confidence in others.

Belief that leadership demonstrates integrity and ethical behavior remained relatively static at 79% from 2012 with a slight overall increase of 3% from 2010. For comparison, 56% strongly agree or agree (i.e., subtracting those who “somewhat agree”). These metric mirrors the Ethics Resource Center’s *National Business Ethics Survey*, which revealed 57% of employees strongly agree or agree that senior leadership sets a good example of ethical behavior.⁵

Comfort Level with Reporting Incidents or Concerns of Noncompliance

Employees were asked to rate their comfort level with reporting issues to their supervisor and their perceptions on whether they felt they would be protected from retaliation when reporting through various mechanisms. This data was collected to evaluate whether respondents felt they could raise concerns without fear of retaliation.

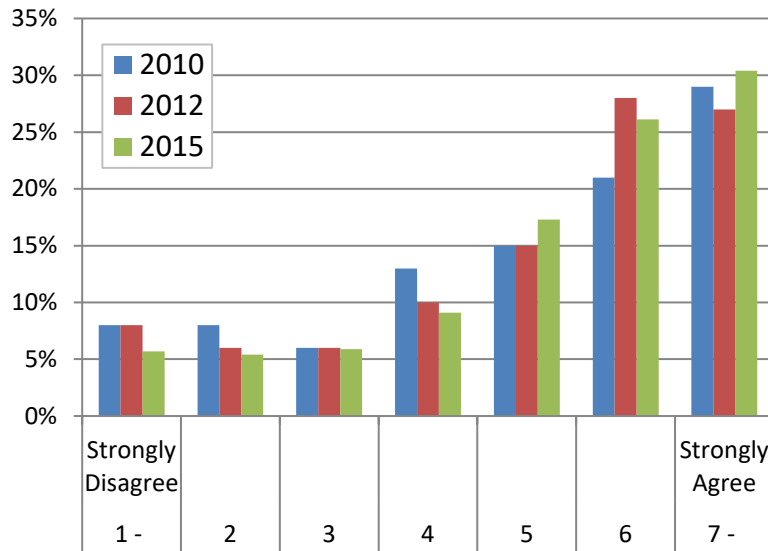
I feel comfortable reporting incidents or concerns of noncompliance to my supervisor.



	2010	2012	2015	Δ
1 - Strongly Disagree	5%	5%	4%	1%
2	7%	5%	4%	1%
3	6%	6%	6%	0%
4	10%	10%	9%	1%
5	14%	14%	14%	0%
6	21%	27%	28%	1%
7 - Strongly Agree	37%	33%	35%	2%

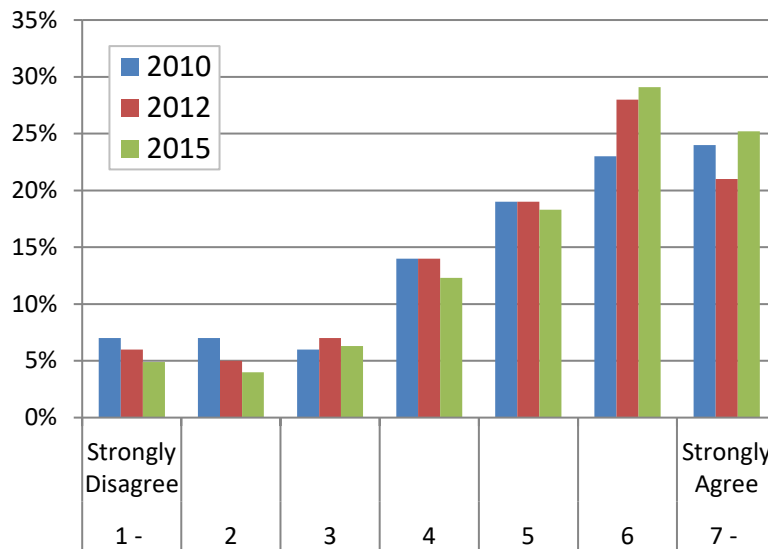
⁵ The Ethical Resource Center administers the National Business Survey biennially to a nationally representative survey of employees at all levels, to understand how they view ethics and compliance at work. The survey opened September 30, 2013 and closed November 15, 2013.

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



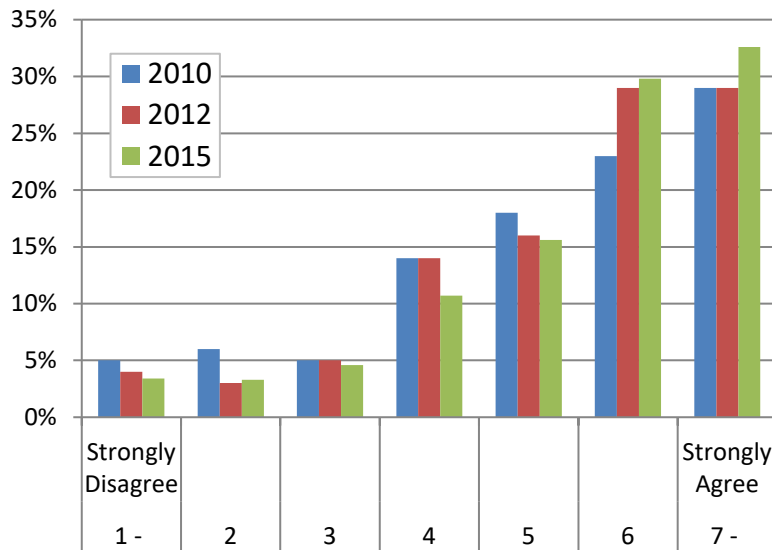
	2010	2012	2015	Δ
1 - Strongly Disagree	8%	8%	6%	2%
2	8%	6%	5%	1%
3	6%	6%	6%	0%
4	13%	10%	9%	1%
5	15%	15%	17%	2%
6	21%	28%	26%	2%
7 - Strongly Agree	29%	27%	30%	3%

I feel that I would be protected from retaliation if I report a suspected compliance violation to a central office (e.g., Human Resources, Athletics, Grants and Contracts, and Effort Reporting, etc.).



	2010	2012	2015	Δ
1 - Strongly Disagree	7%	6%	5%	1%
2	7%	5%	4%	1%
3	6%	7%	6%	1%
4	14%	14%	12%	2%
5	19%	19%	18%	1%
6	23%	28%	29%	1%
7 - Strongly Agree	24%	21%	25%	4%

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



	2010	2012	2015	Δ
1 - Strongly Disagree	5%	4%	3%	1%
2	6%	3%	3%	0%
3	5%	5%	5%	0%
4	14%	14%	11%	3%
5	18%	16%	16%	0%
6	23%	29%	30%	1%
7 - Strongly Agree	29%	29%	33%	4%

Conclusion

Overall, once of the most commonly cited deterrent to reporting a concern is a fear of retaliation. This is reflected in the 2010, 2012 and 2015 surveys. However, the university receives very few reports of actual retaliation or threat of retaliation, and in the last 18 months, only two of these reports were substantiated.⁶

Respondents indicated their comfort level in reporting directly to a supervisor increased by 3% from the 2012 survey and 5% from 2010, as did the belief that the reporter would be protected from retaliation if reporting to a supervisor, central office, or the VCU Helpline (increasing by 3%, 4% and 5% respectively). Additionally, respondents felt most confident that they would be protected from retaliation by reporting through the VCU Helpline at 79%, followed by reporting direct to a supervisor, and reporting to a central office at 73% and 72% respectively.

Accordingly, the *National Business Ethics Survey* found that 30% of surveyed employees across the United States chose not to report misconduct for fear of retaliation by a supervisor. At VCU, 21% cited fear of retaliation by a supervisor as the reason for not reporting observed misconduct.⁷

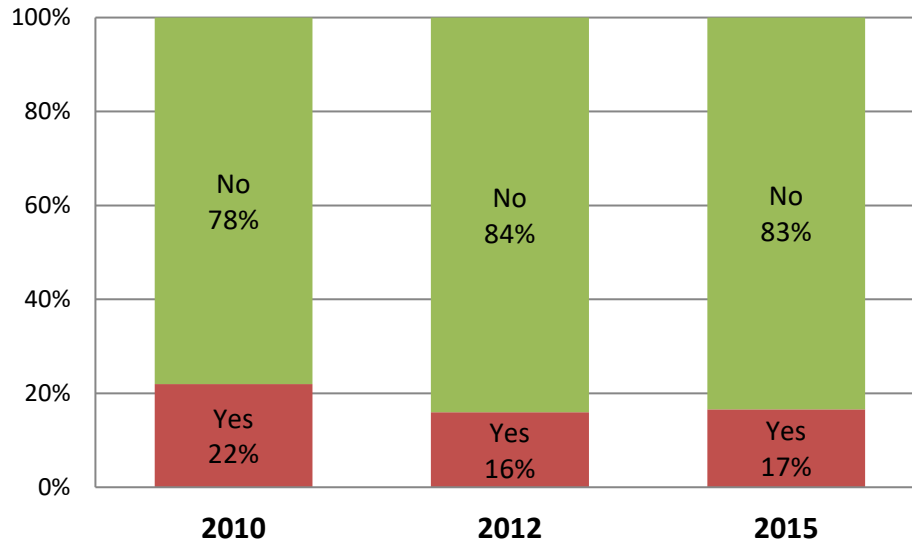
⁶ This data is reported annually to the BOV in the ICO's *Annual Report* and has limitations outlined therein.

⁷ See page 14

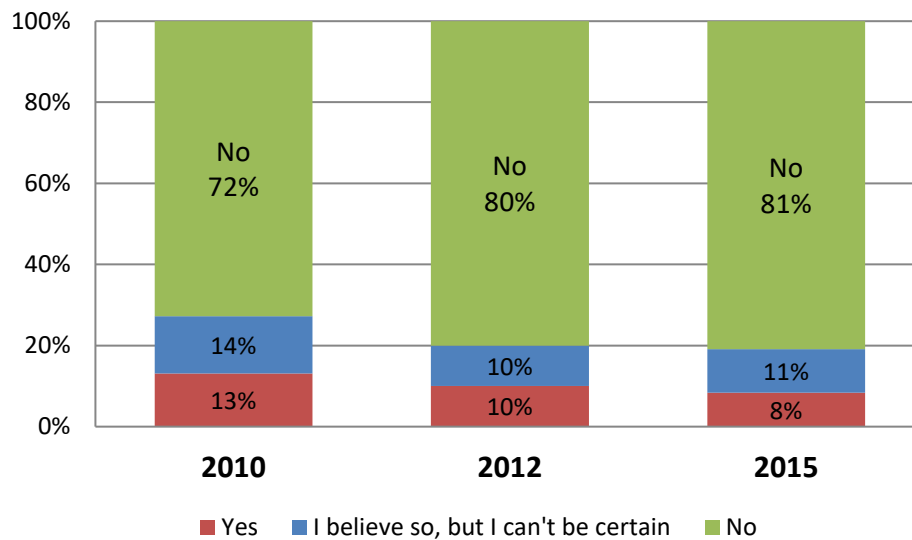
Observation of Misconduct

The following questions were raised to assess perceptions of misconduct in relation to actual experienced or observed misconduct.

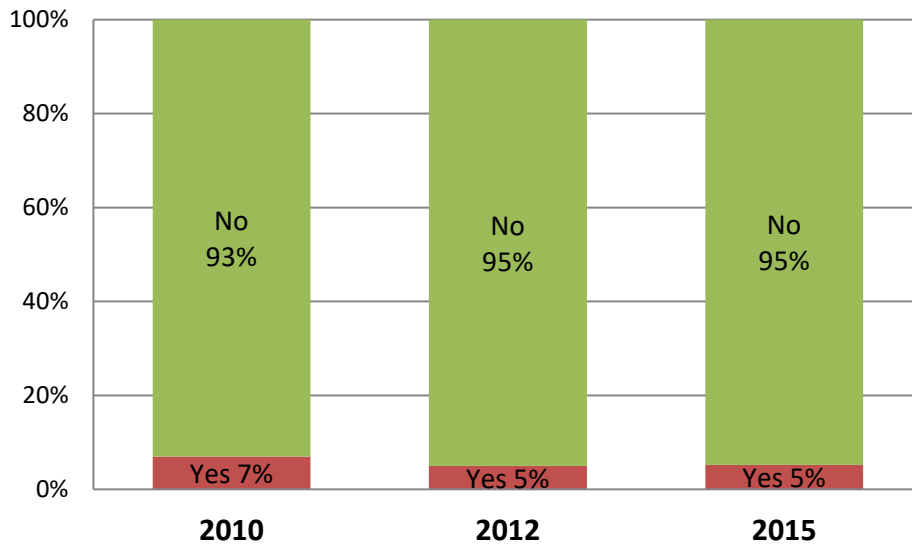
I have experienced or observed repeated, extremely disrespectful, or unprofessional behavior in the workplace by a supervisor within the last 12 months.



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



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



Conclusion

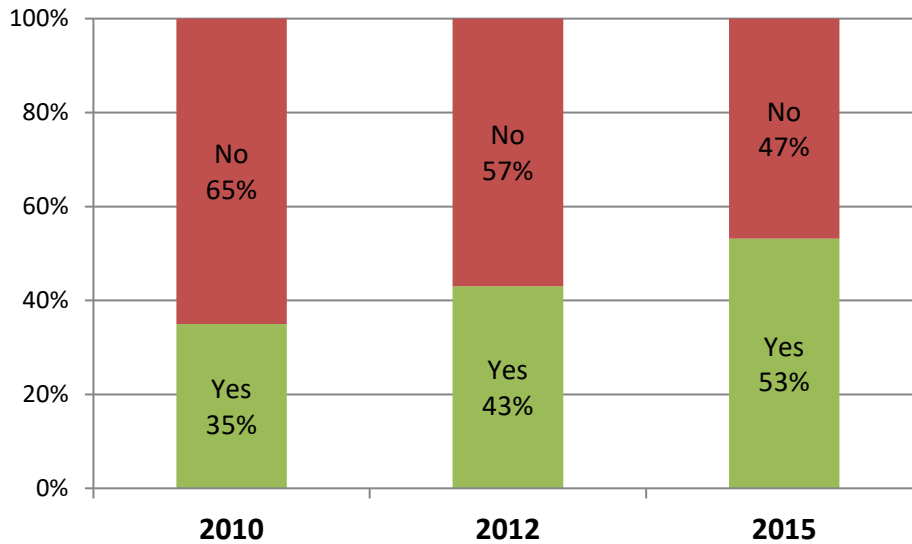
Overall, “experienced or observed repeated, extremely disrespectful, or unprofessional behavior in the workplace by a supervisor” remained relatively constant at around 83%. Employees who observed misconduct held around 19%. However, there is a discrepancy between the reported rate of experiencing and/or observing misconduct (19%) and those reporting being directly asked to bend, break or circumvent laws, regulations or policy (5%). This implies that perceptions of misconduct may be greater than actual occurrences or that observing misconduct is more often the case than directly experiencing it. A similar conclusion was also reflected in the ICO’s *Annual Report*, which analyzed compliance reporting statistics.

In contrast, the *National Business Ethics Survey* reported that 41% of employees nationwide observed misconduct in the workplace. VCU’s rate of 19% is a positive indicator of the *Ethics and Compliance Program’s* effectiveness.

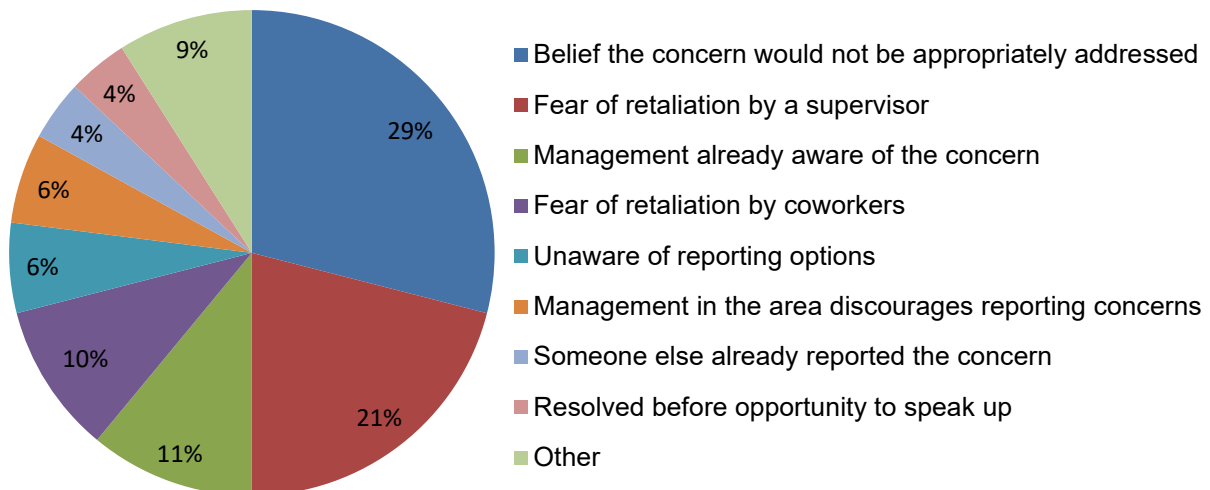
Reporting of Misconduct

Reporting misconduct internally is always an organization's ultimate goal in order to be as agile in responding as possible. The following charts illustrate additional follow up detail from 19% of employees who reported experiencing or observing misconduct.

If you replied "yes" to any of the above three questions, did you report your concern? ⁸

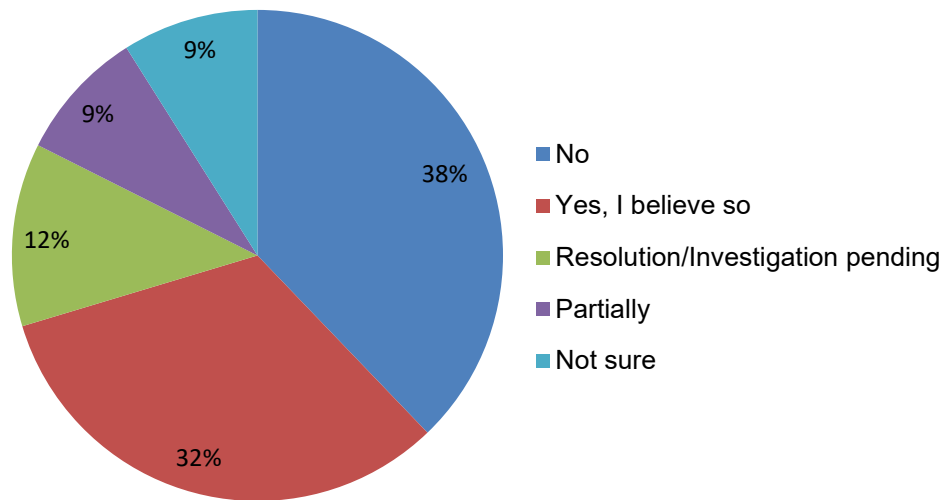


Why didn't you report your concern?



⁸ Three questions were: I have experienced or observed repeated, extremely disrespectful or unprofessional behavior in the workplace by a supervisor within the last 12 months; I have experienced or observed a violation of laws, regulations or university policy in my office/department within the last 12 months; and I was asked to bend, break or circumvent laws, regulations and/or university policies during the last 12 months by someone in my department.

Was the matter properly resolved?



Conclusion

Fifty-three percent of employees responded that they chose to report the misconduct that they experienced or observed in the last 12 months. This is an improvement of 10% from the 2012 survey and 18% from the 2010 survey.

Belief that a reported concern would not be appropriately addressed (29%) was cited as the top reason employees chose not to report their concerns. In past years, fear of retaliation was cited as the top reason, with 34% in 2012 and 43% in 2010. Fear of retaliation by a supervisor was cited as the second top reason for not reporting at 21% for 2015.

The reporting rate of those who observed misconduct for VCU (53%) is notably lower than the 63% published in the *National Business Ethics Survey*, indicating that managers and supervisors would likely benefit from increased training on handling reported concerns to reduce the perception that concerns are not appropriately addressed. Additionally, reporting options and anti-retaliation may need to be better communicated.

Of those who reported misconduct, 41% felt the matter was fully or partially resolved, 9% were unsure, and 38% were unsatisfied with the resolution. It is suspected that the unsatisfactory and unsure rate is likely attributed to the fact that communication of the resolution is limited when related to personnel action. Comments collected in this year's survey support this conclusion. Additionally, employees noted the perception that those in higher level roles are not held accountable and reported concerns continue or repeat.

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

Kudos	Criticisms
<p>I believe that the vast majority of people in VCU Leadership and those who are staff employees operate ethically and with a high degree of integrity.</p>	<p>Leadership is not setting the appropriate "Tone at the Top" in its dealing and leadership of VCU. It is hard to drive home an ethical culture when the direct reports to the President don't embody the culture.</p>
<p>I believe the working environment and employees with which I'm familiar demonstrate a high level of integrity. I have never witnessed a violation of ethics.</p>	<p>There's a lot of emphasis on compliance - not enough, in my opinion, on being proactive and responsible for creating a civil environment with a shared commitment to core values. The code of conduct is a step in this direction, but more needs to be done to educate people on what this means and on appropriate ways of holding each other accountable.</p>
<p>I believe that the continuing education program on ethics compliance at VCU is effective in sustaining the culture of strong ethical behavior and refreshing the personal knowledge that might recede if we didn't frequently review the policies and reporting procedures.</p>	<p>I have some concerns that there is a culture of non-compliance or laxity among some higher level community members who have been here for a significant amount of time, and that when concerns are voiced by others, there is a tendency to downplay the concerns and handle the issues with minimal and/or ineffective responses.</p>
<p>I have no concerns about integrity and compliance at VCU. I find it to be a professional and courteous workplace environment wherever I happen to be on campus (while I work on the VCUHS side of the campus I am not a stranger to the Monroe Campus). I appreciate this survey and have saved the links that are in the first page as resources for my files. I did not know about the anonymous calling service and find it interesting. I hope that others are as happy to work for, and at VCU as I am.</p>	<p>A lot of managers and supervisors do not come into their positions with any experience on how to manage their employees. This sometimes makes it hard to address issues and can cause more/major problems. Some managers are not approachable and you don't always feel that you can trust them. There is a fear of retaliation or a fear that nothing will be done.</p> <p>It would be nice if there was some kind of training that managers/supervisors could attend regularly to help.</p>
<p>The online "Compliance Education" module was very well done. It was obvious that a lot of time and effort went into development and presentation of the material. It was a positive, informative addition to required training. It was engaging, informative, and contained valuable info... not "just another module" to mark off the list. Thank you for your efforts to provide effective methods for compliance and ethics education to all employees across the university.</p>	<p>The staff are very serious about compliance but upper management do not emulate that same concern. Upper management are not familiar with policy training and rules that staff must complete mandatory training on when dealing with fiscal responsibility. There's a disconnect between lower staff who are asked to enforce policy and Chairs and Deans who don't know and don't care about policies in place. I've been told, "You don't work for the compliance office you work for me."</p>

General Themes of Comments

