INTEGRITY & COMPLIANCE CULTURE SURVEY

The Integrity and Compliance Office conducted an integrity and compliance focused culture survey in December 2012. 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. The future plan is to conduct this survey annually or biennially, to continually assess the culture of integrity and compliance.

Initially, this survey was conducted in 2010 and, after a change in leadership within the Office and a university-wide awareness campaign focused on VCU's Compliance and Ethics Program, the survey was conducted a second time at the end of calendar year 2012. This report offers a summary of the 2012 survey results and benchmarking with the initial 2010 survey results.

The survey data reveals a 27% participation increase this year with a total of 2,100 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 two individuals to win a Kindle e-Reader 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 survey data. Eighty percent reported that leadership at VCU demonstrated integrity and ethical behavior, an increase of 4% from the 2010 survey.

The percentage of respondents who experienced or observed integrity or compliance violations decreased slightly, by 3%, accompanied by an 8% increase in reporting those experiences and observations. Fear of retaliation was cited as the top reason employees chose not to report their concerns, at 34% of respondents. Other reasons include the belief that the issue would not be addressed or taken seriously (21%) or the issue was believed to be minor and did not merit reporting (8%).

At the conclusion of the survey, respondents had the option of submitting general comments about the overall culture of compliance at VCU. Forty percent of feedback was exclusively positive, 56% suggested implementing additional training and outreach concerning compliance and integrity topics, and 22% expressed concern that classified staff are held to a higher level of expectations than faculty.
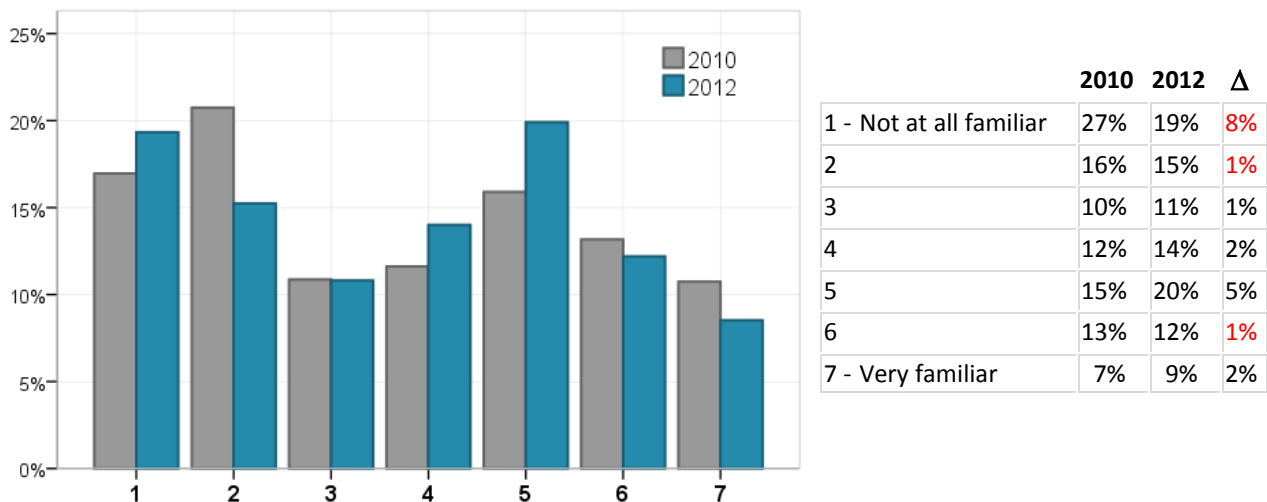
The following pages contain detailed information and conclusions in the following subcategories:

- 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 misconduct[1]
- 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 Policy Library and VCU Helpline. Additional guidance is available in foundational governing documents such as the Code of Ethics, Code of Conduct for Business Practices, and VCU Creed. The following questions were posed to measure familiarity with these resources and help determine where to focus ICO awareness and education efforts. Three new questions were included in this year's survey to gauge awareness of the VCU Creed, the Policy Library, and available resources for supervisors wanting to re-iterate or to encourage and develop ethical and compliant behavior with their employees.

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

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

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[1] Misconduct is defined as failure to meet expectations. Expectations are set by laws, regulations and VCU's policies.
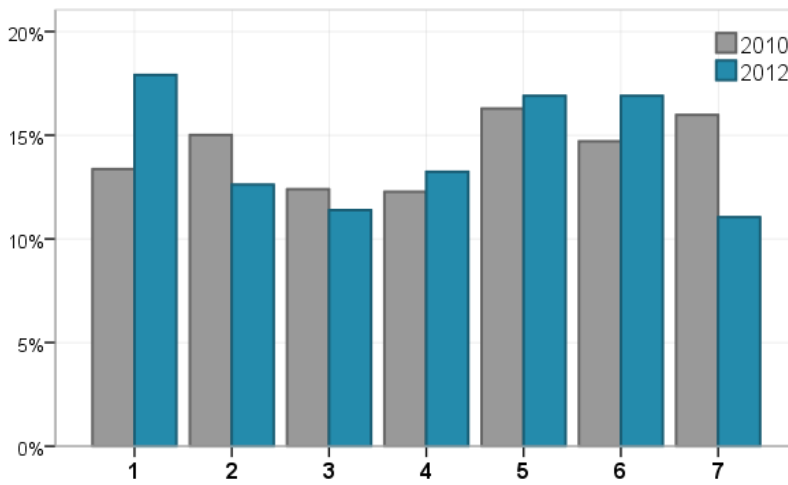[2] A percentage value appearing in red text in the change column indicates a decrease in change from the 2010 survey.
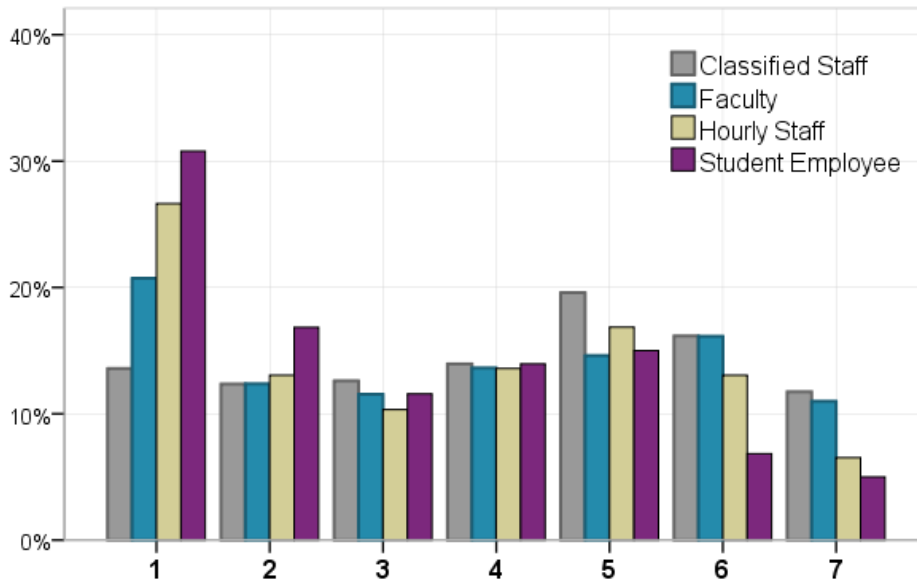
How familiar are you with the Code of Ethics?
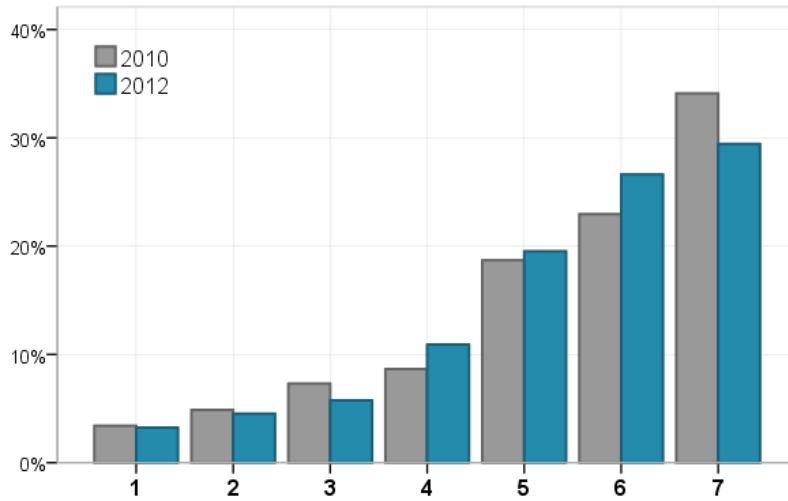
	2010	2012	Δ
1 - Not at all familiar	3%	3%	-
2	5%	4%	1%
3	7%	6%	1%
4	9%	11%	2%
5	19%	20%	1%
6	23%	27%	4%
7 - Very familiar	34%	29%	5%

How familiar are you with the Code of Conduct for Business Practices?

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

How familiar are you with the VCU Creed?

	2012
1 - Not at all familiar	20%
2	13%
3	12%
4	14%
5	17%
6	14%
7 - Very familiar	10%

How familiar are you with the VCU Policy Library?
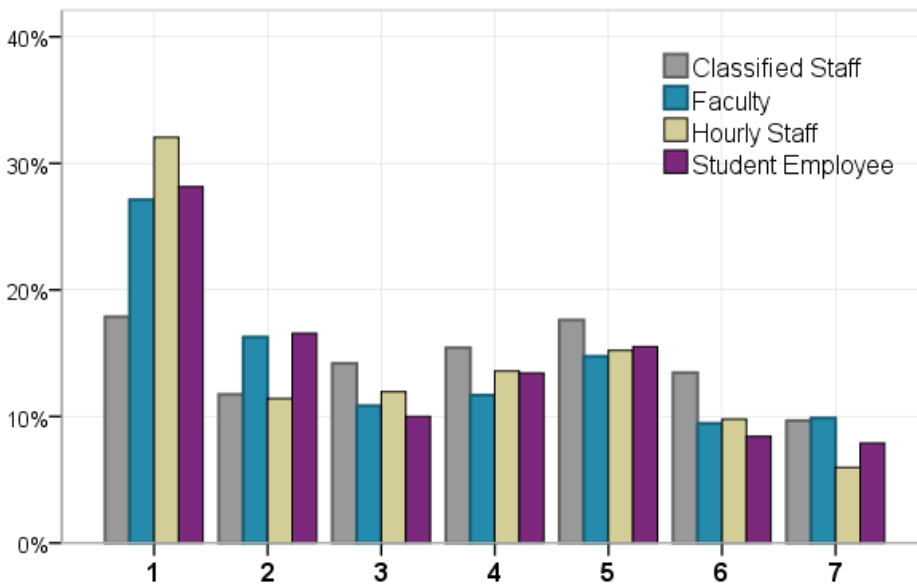
	2012
1 - Not at all familiar	24%
2	14%
3	12%
4	14%
5	16%
6	11%
7 - Very familiar	9%

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

	2010	2012	Δ
1 - Not at all familiar	15%	16%	1%
2	17%	9%	8%
3	11%	10%	1%
4	10%	11%	1%
5	15%	16%	1%
6	15%	20%	5%
7 - Very familiar	17%	18%	1%
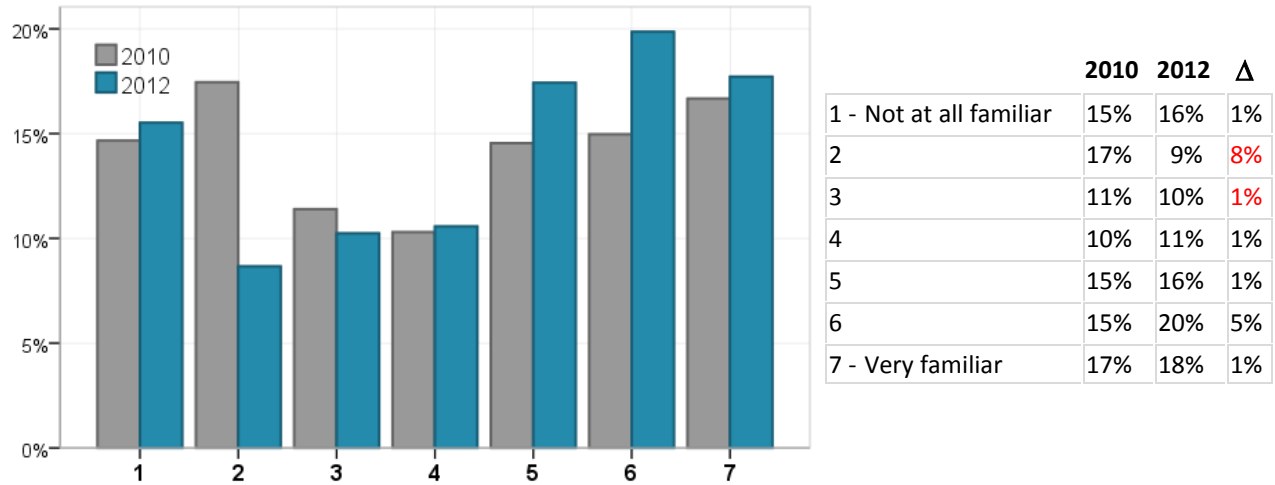
As a supervisor, or other leadership role, I know where I can find resources to assist me in developing appropriate ethical and compliant behavior in my employees.

	2012
1 - Strongly Disagree	3%
2	3%
3	7%
4	20%
5	18%
6	28%
7 - Strongly Agree	21%
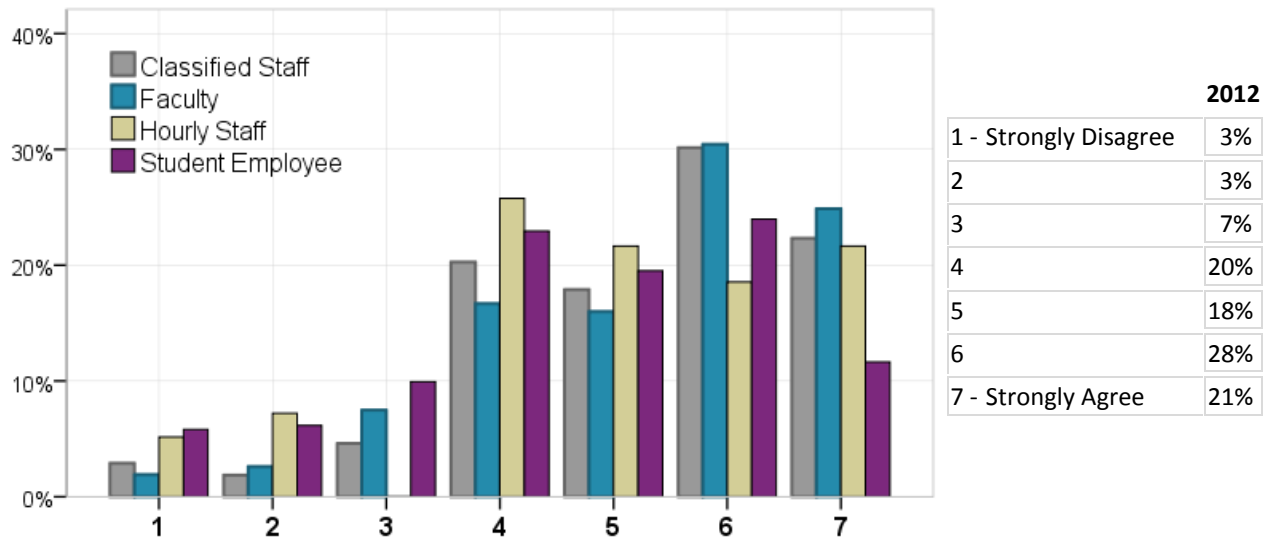
Conclusion

Overall, there is a 6% increase in familiarity with the ICO and 7% increase in familiarity with the VCU Helpline. Familiarity with governing documents was similar to results of the 2010 survey.

Classified staff reported higher rates of familiarity for all questions with the exception of knowing where to find resources to assist with developing ethical/compliant behavior in employees. This
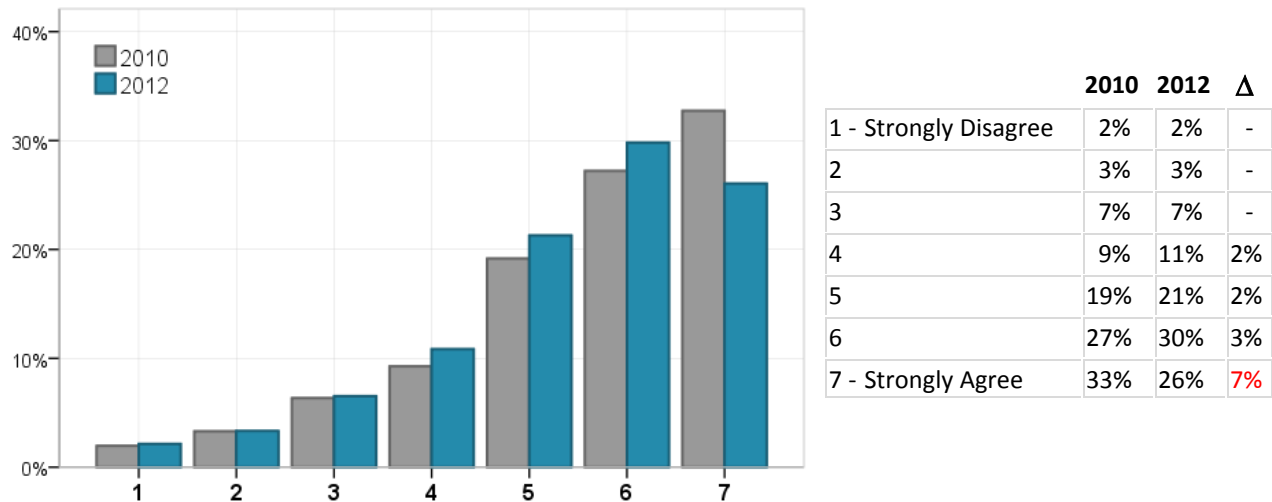
question, in addition to familiarity with the Policy Library and VCU Creed, will be used for benchmarking future survey results.

The overall increase in familiarity is most likely attributable to increased education as a part of the ICO's Awareness Campaign, which included mailers to all employees' home address, training presentations, presence of informational tables at VCU sponsored events, and joining several collaborative committees and workgroups.[3]
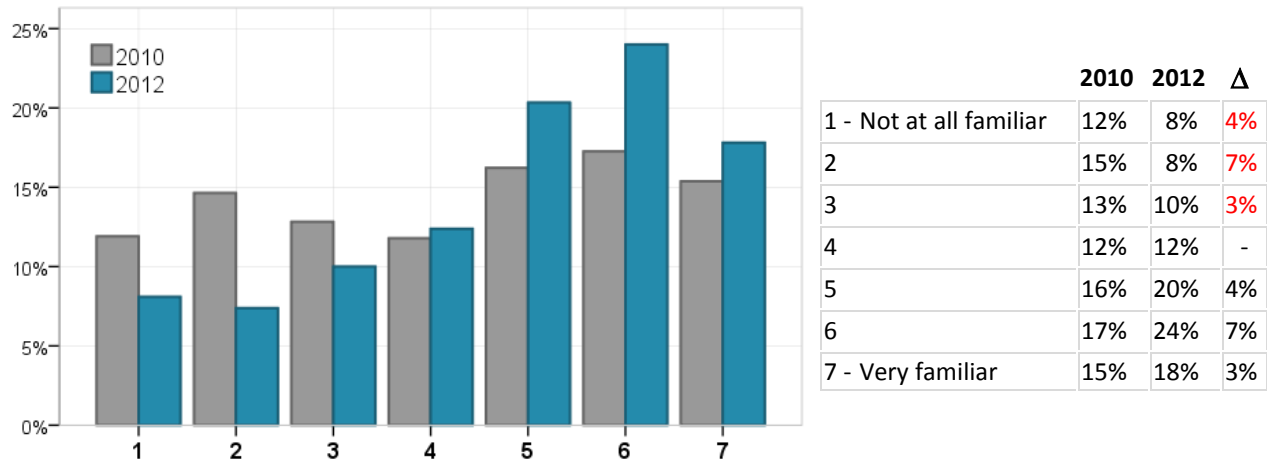
Familiarity with Policies

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.

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

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

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[3] This list is not exhaustive.

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

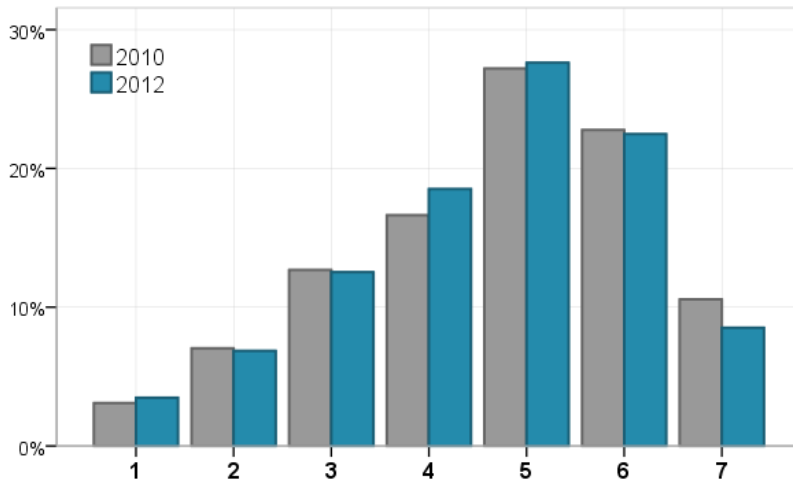|	2010	2012	Δ
1 - Not at all familiar	12%	8%	4%
2	15%	8%	7%
3	13%	10%	3%
4	12%	12%	-
5	16%	20%	4%
6	17%	24%	7%
7 - Very familiar	15%	18%	3%

Conclusion

Employees reported having challenges with where to find policies and procedures at 23%. Nine percent of classified staff, 15% of hourly staff, 12% of faculty and 23% student employees reported having these challenges. Familiarity with the Policy Library, at 36% of respondents being familiar, also reflects this concern. The expectation is that this metric will increase significantly over the next year as the Policy Program is further developed, promoted, and utilized.

Contrary to this finding, there was a significant increase from the 2010 survey (+14%) 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	Δ
1 - Strongly Disagree	3%	3%	-
2	7%	7%	-
3	12%	12%	-
4	17%	19%	2%
5	27%	28%	1%
6	23%	22%	1%
7 - Strongly Agree	11%	9%	2%

I believe that most employees at VCU demonstrate integrity and ethical behavior in performance of their job duties.
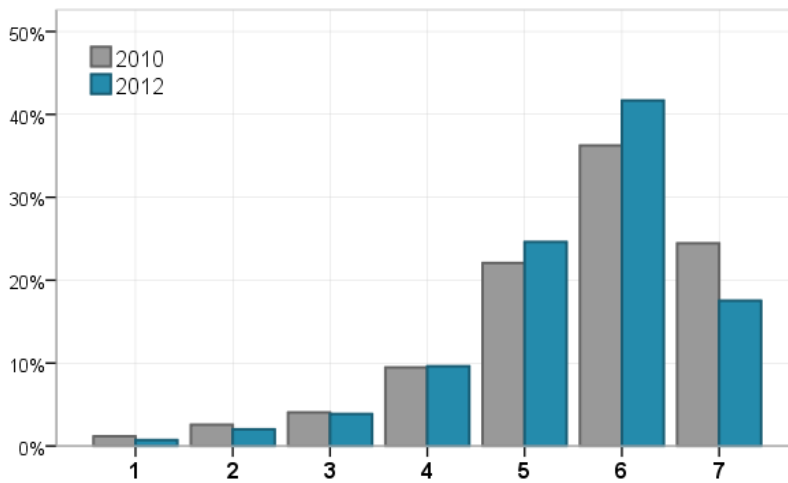
	2010	2012	Δ
1 - Strongly Disagree	1%	1%	-
2	3%	2%	1%
3	4%	4%	-
4	10%	9%	1%
5	22%	25%	3%
6	36%	42%	6%
7 - Strongly Agree	24%	17%	7%

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

	2010	2012	Δ
1 - Strongly Disagree	2%	2%	-
2	5%	2%	3%
3	6%	6%	-
4	11%	10%	1%
5	22%	22%	-
6	31%	40%	9%
7 - Strongly Agree	23%	18%	5%
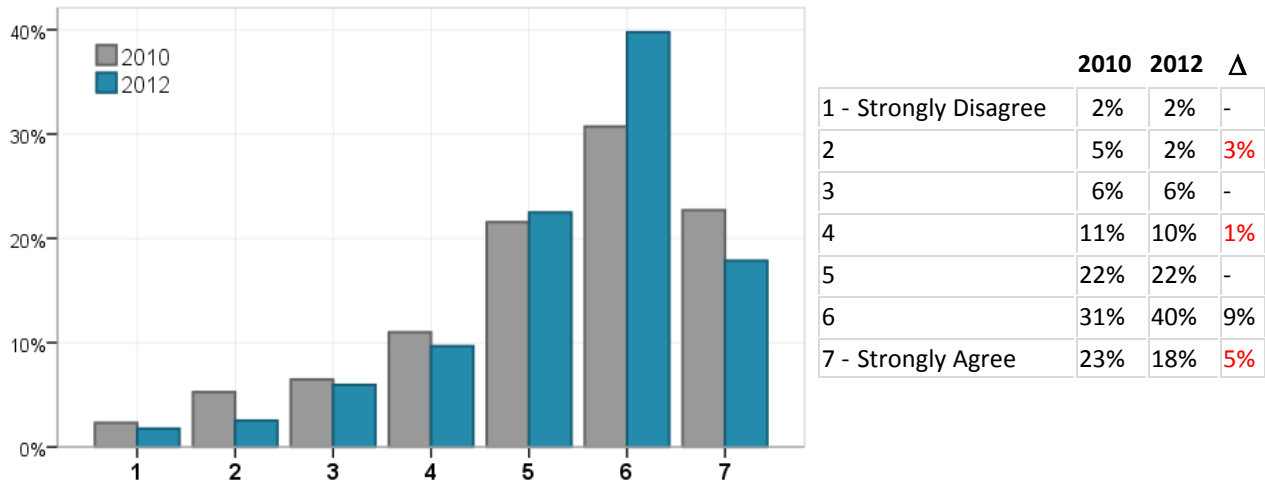
Conclusion

With a slight decrease, at 2% from the 2010 survey, the 2012 data demonstrates respondents are in agreement that most employees know the laws, regulations, and policies they are required to follow. This is balanced by a 2% increase in agreement that most employees demonstrate integrity and ethical behavior in the workplace. Interestingly, that while only 59% of respondents agreed that most employees know the policies that they are required to follow, 77% 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 increased 4% from 2010. This metric is significantly positive when compared to the Ethics Resource Center's *National Business Ethics Survey*, which revealed a 10% decline, nationwide, in employee confidence in their leadership displaying ethical behavior.[4]

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

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[4] 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 15, 2011 and closed September 29, 2011.

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.
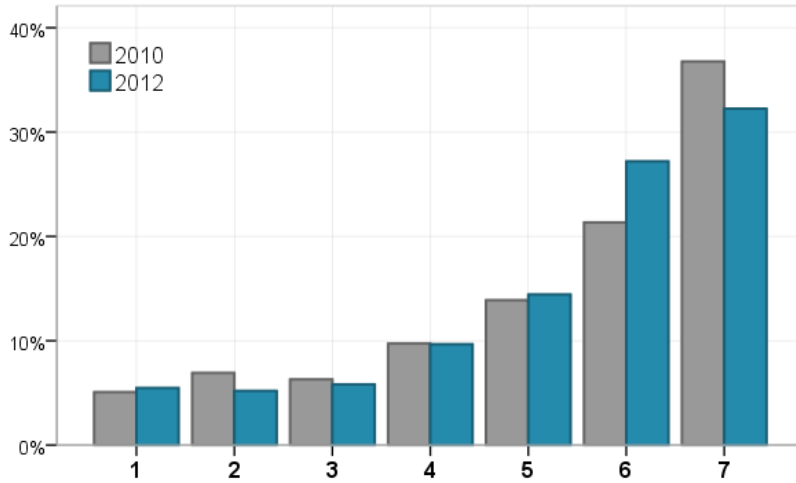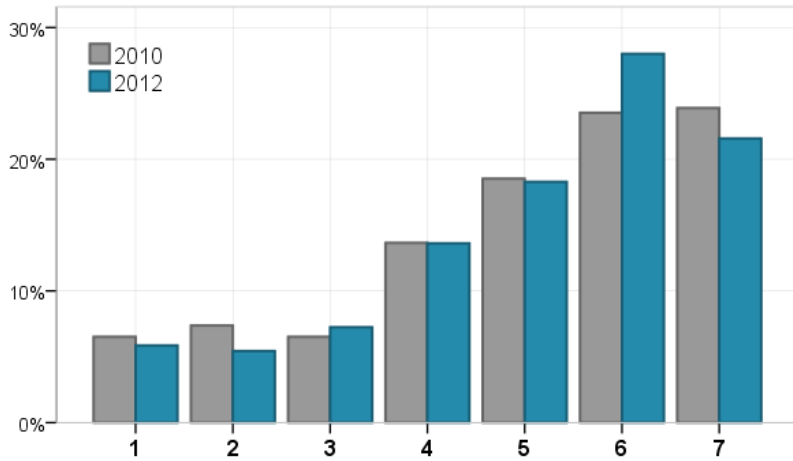

	2010	2012	Δ
1 - Strongly Disagree	5%	5%	-
2	7%	5%	2%
3	6%	6%	-
4	10%	10%	-
5	14%	14%	-
6	21%	27%	6%
7 - Strongly Agree	37%	33%	4%

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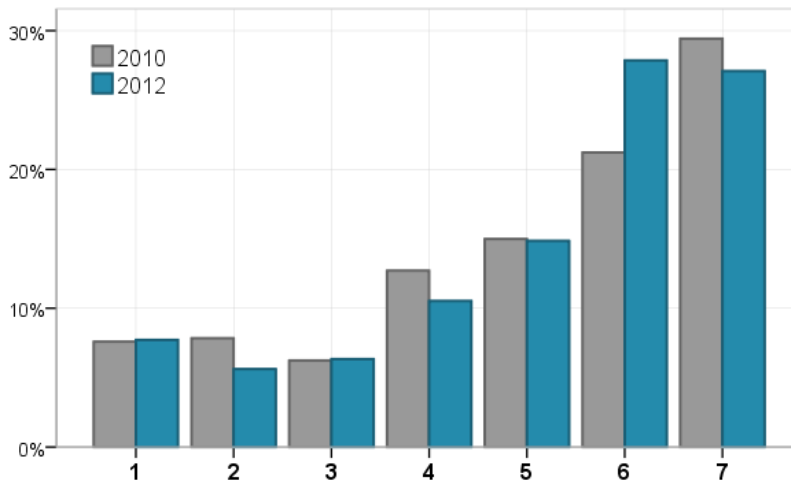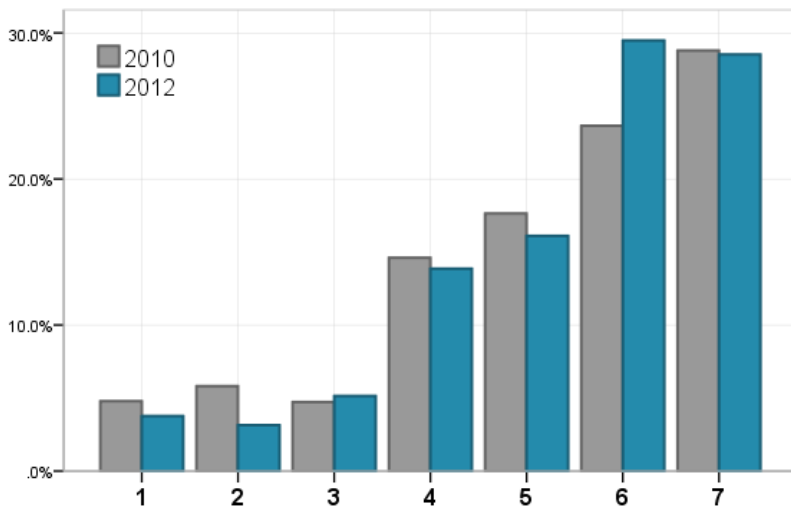

	2010	2012	Δ
1 - Strongly Disagree	8%	8%	-
2	8%	6%	2%
3	6%	6%	-
4	13%	10%	3%
5	15%	15%	-
6	21%	28%	7%
7 - Strongly Agree	29%	27%	2%

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	Δ
1 - Strongly Disagree	7%	6%	1%
2	7%	5%	2%
3	6%	7%	1%
4	14%	14%	-
5	19%	19%	-
6	23%	28%	5%
7 - Strongly Agree	24%	21%	3%

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

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

Conclusion

Overall, the most commonly cited deterrent to reporting a concern is a fear of retaliation. This is reflected in both the 2010 and 2012 surveys. Ironically, the university receives very few reports of retaliation and in the last 18 months no report of retaliation was substantiated.[5]

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[5] This data is reported annually to the BOV in the Annual Issues and Events Report and has limitations outlined therein.

Respondents indicated their comfort level in reporting directly to a supervisor increased by 2% from the 2010 survey, 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 5%, 2% and 4% respectively). Additionally, respondents felt most confident that they would be protected from retaliation by reporting through the VCU Helpline, at 74%, followed by reporting direct to a supervisor, and reporting to a central office at 70% and 68% respectively.

In contrast, the *National Business Ethics Survey* found that only 19% of surveyed employees across the United States felt that they could question management without fear of retaliation.
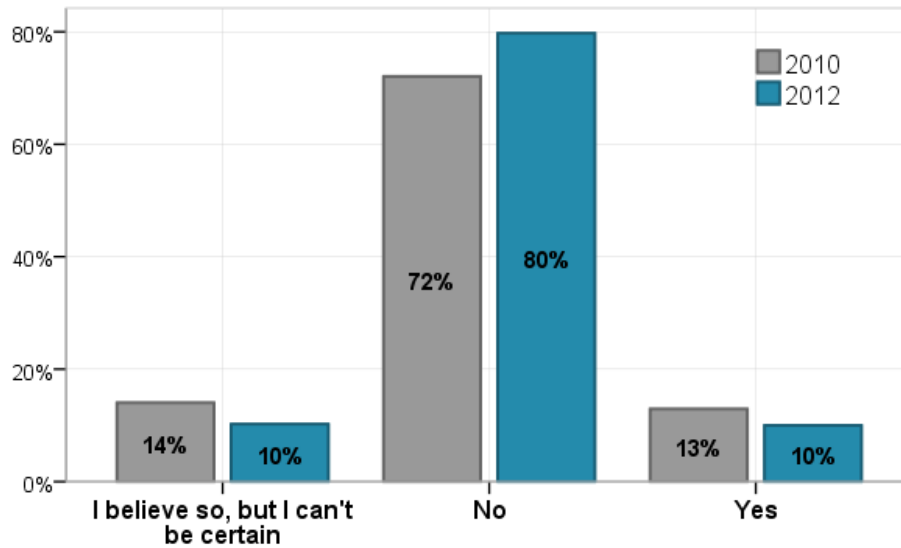
Observation of Misconduct

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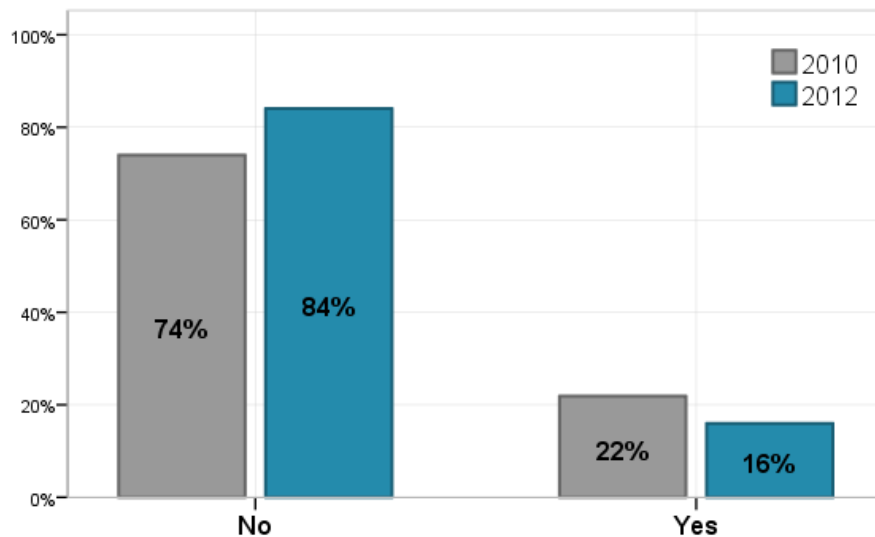
I have experienced or observed a violation of laws, regulations, or university policy in my office/department within the last 12 months.

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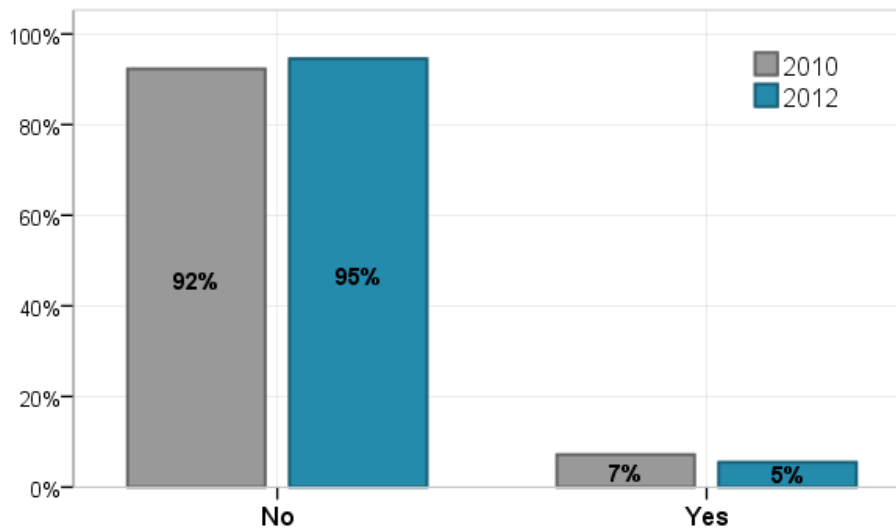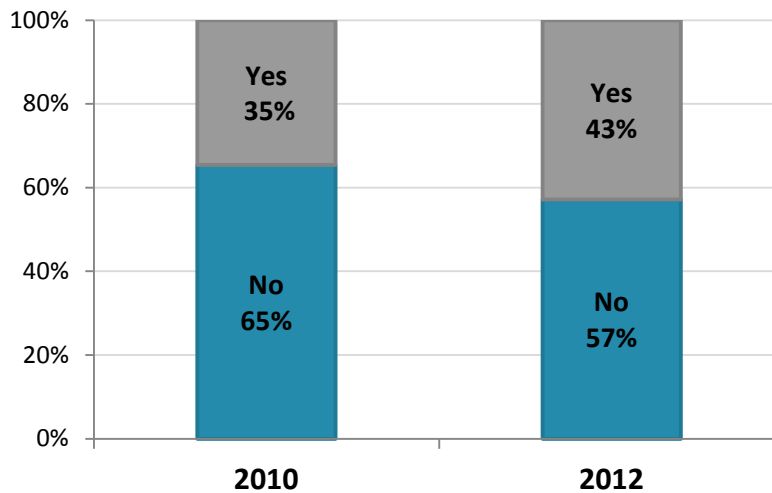

Conclusion

Overall, there was a reduction in actual experienced or observed misconduct between 2010 and 2012, by 17%. Furthermore, there is a difference revealed between reported rates of experiencing and/or observing misconduct, at 80% stating "No," and the reported rate, of 5%, in being directly

asked to bend, break or circumvent laws, regulations or policy. 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 Issues and Events Report 2012*, which analyzed compliance reporting statistics.
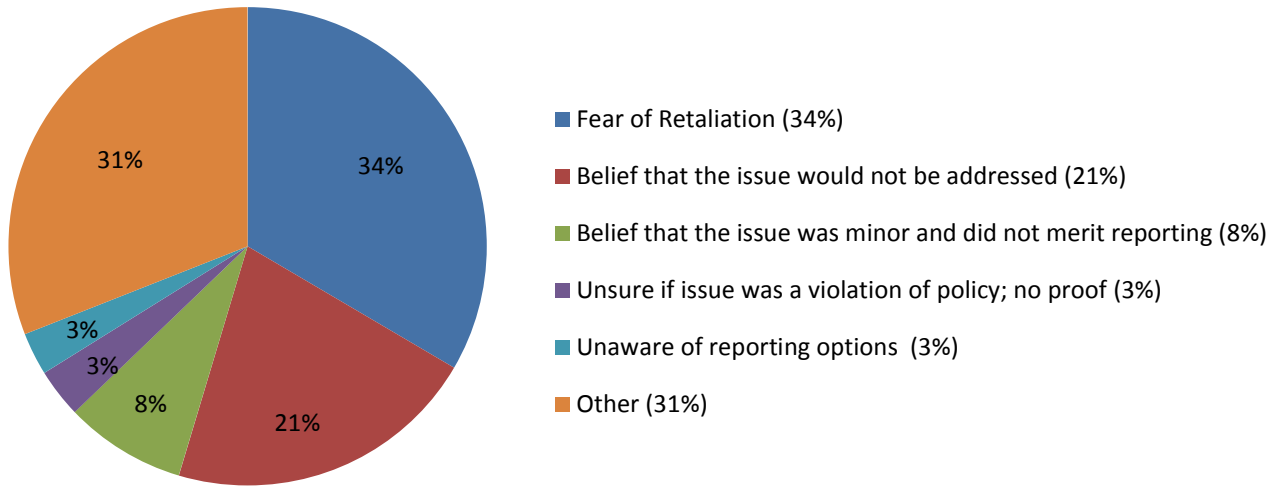
Reporting of Misconduct

Employees were asked why they chose not to report misconduct and whether they felt reported concerns were properly resolved.

If you replied "yes" to any of the above three questions, did you report your concern? [6]

[Bar chart showing:
2010: No 65% (teal), Yes 35% (gray)
2012: No 57% (teal), Yes 43% (gray)
Y-axis from 0% to 100%]

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[6] 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.

Why didn't you report your concern?

- Fear of Retaliation (34%)
- Belief that the issue would not be addressed (21%)
- Belief that the issue was minor and did not merit reporting (8%)
- Unsure if issue was a violation of policy; no proof (3%)
- Unaware of reporting options (3%)
- Other (31%)

Was the matter properly resolved?

- Yes, I believe so (40%)
- No (35%)
- Resolution/investigation pending (9%)
- Partially (8%)
- Not sure (8%)
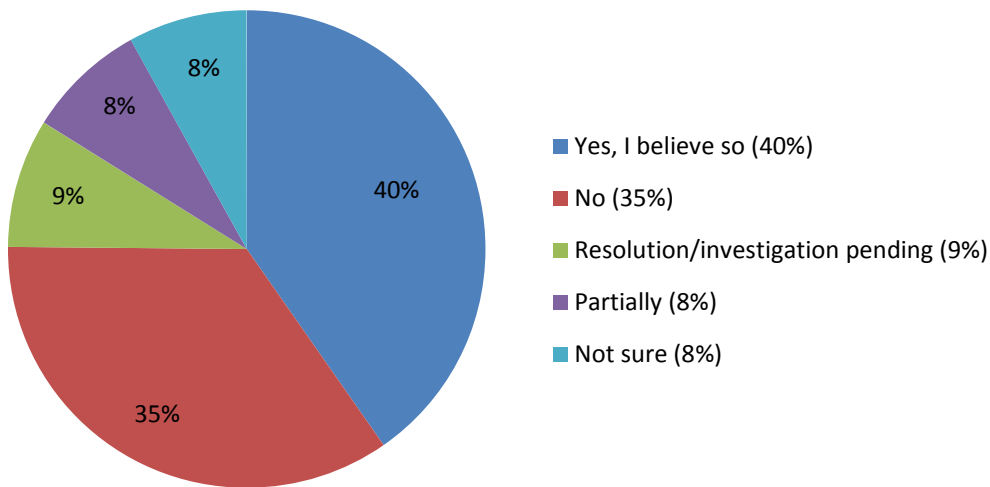
Conclusion

Forty-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 8% from the 2010 survey. Fear of retaliation was cited by 34% of respondents as the top reason they chose to not report their concerns, which was also the top reason in the 2010 survey at 43%.

Of those who reported misconduct, 48% felt the matter was fully or partially resolved, 8% were unsure, and 35% were unsatisfied with the resolution. It is suspected that the 35% unsatisfactory rate is likely attributed to the fact that often communication of results is limited due to being

personnel action related. Mostly, parties external to corrective action plans do not realize all corrective measures in place; however, it is noted that substantiated reported issues should always result in some degree of noticeable overall improvement in the area.

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

Kudos	Criticisms
I am very proud to be working at an institution where not only the organization itself, but individual employees are seen to be regularly concerned with promoting ethical behavior-especially in research.	The support systems are in place but if you do have a supervisor who retaliates, it is difficult to use them. I think more work needs to be done with work place bullying.
I have found my coworkers and supervisors at VCU to be an honest bunch. Everyone pays attention to university policies to avoid breaking any laws or acting in an inappropriate manner.	People need to be held more accountable and I believe that starts with management first. Management is not being held responsible for their duties and it then creates a "trickle down" effect.
I think VCU has done a fine job in the past few years to promote integrity and compliance. There are some new things that we didn't have years ago.	There is great disparity between how faculty and staff are treated. Staff are required to follow all rules to the letter while faculty and administration get a slap on the hand if they do something wrong. There are no consequences and therefore no one feels the need to improve their integrity and compliance.
VCU has made good progress in these areas in recent years.	I am concerned that there are policies in place but a lack of enforcement on the department level. Without enforcement, people push limits and try to break rules. Things that have been previously reported have been swept under the rug.

Overall positive comments	71
General suggestions regarding policies and compliance	59
Suggestions related to integrity and compliance topical training	33
Negative comments related to lower compliance expectations for leadership/faculty	24
Negative comments related to retaliation	17
Comments concerning recent high profile faculty non-renewal	13