



The ICO and You

Ethics and Compliance Update for the Faculty Senate



VCU

Integrity and Compliance

Purpose and Agenda

Purpose:

To share information from the ICO that is relevant to YOU

Agenda:

- ✓ Who we are and what we do
- ✓ Promoting a speak-up culture
 - ✓ Our reporting system
 - ✓ Confidential vs. anonymous
- ✓ The ins and outs of gifts
- ✓ Seeking your input: New COIC Policy/Process

Who We Are

Executive Director Karen Helderma reports directly to the Board of Visitors.

Our CECO Suzanne Milton reports to Karen.

- **Independent oversight** roles help to ensure proper controls, conduct and culture through
 - Internal Audit – 3rd line of defense
 - Ethics & Compliance Program – 2nd line of defense
- **Coordinate efforts** university wide, with functional compliance area leads and operational program managers – 1st line of defense

Board of
Visitors

Karen
Helderma



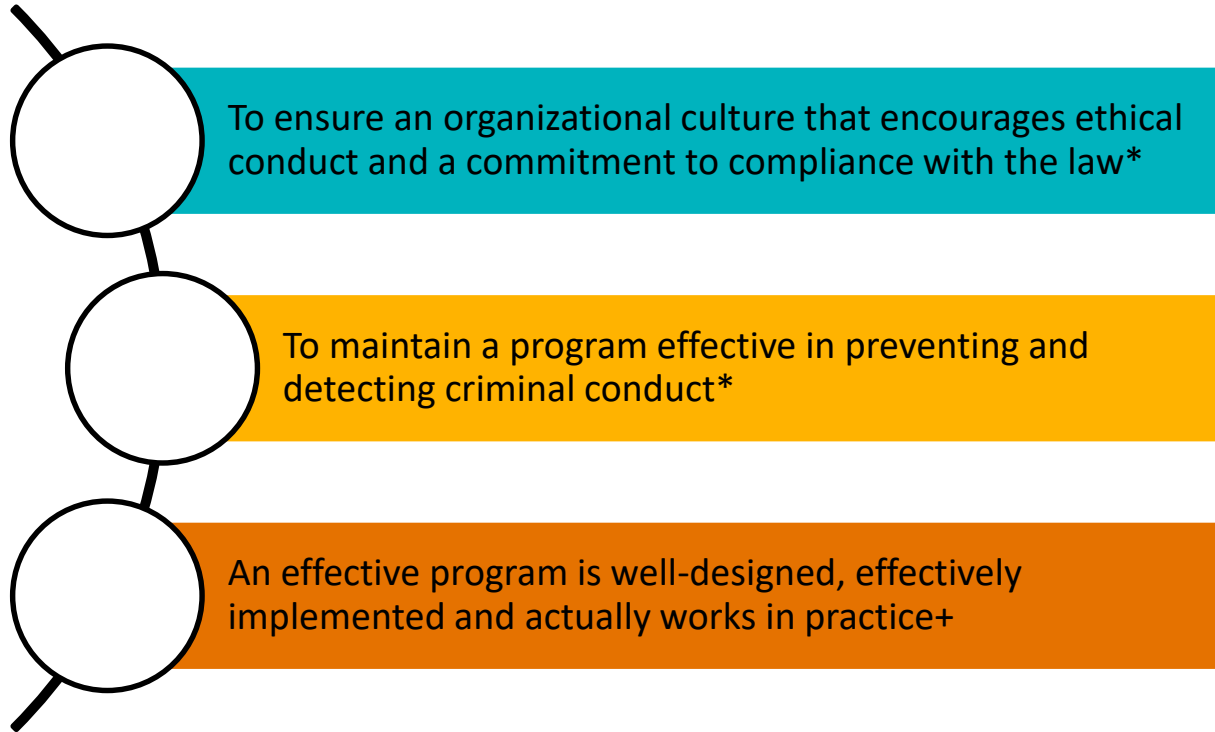
Suzanne
Milton



What We Do



Why Ethics and Compliance?



*U.S. Sentencing Commission Guidelines Manual, Chapter 8, Section 8.B.2.1
+U.S. Department of Justice, Criminal Division (Updated January 8, 2021)

Promoting a Speak-up Culture

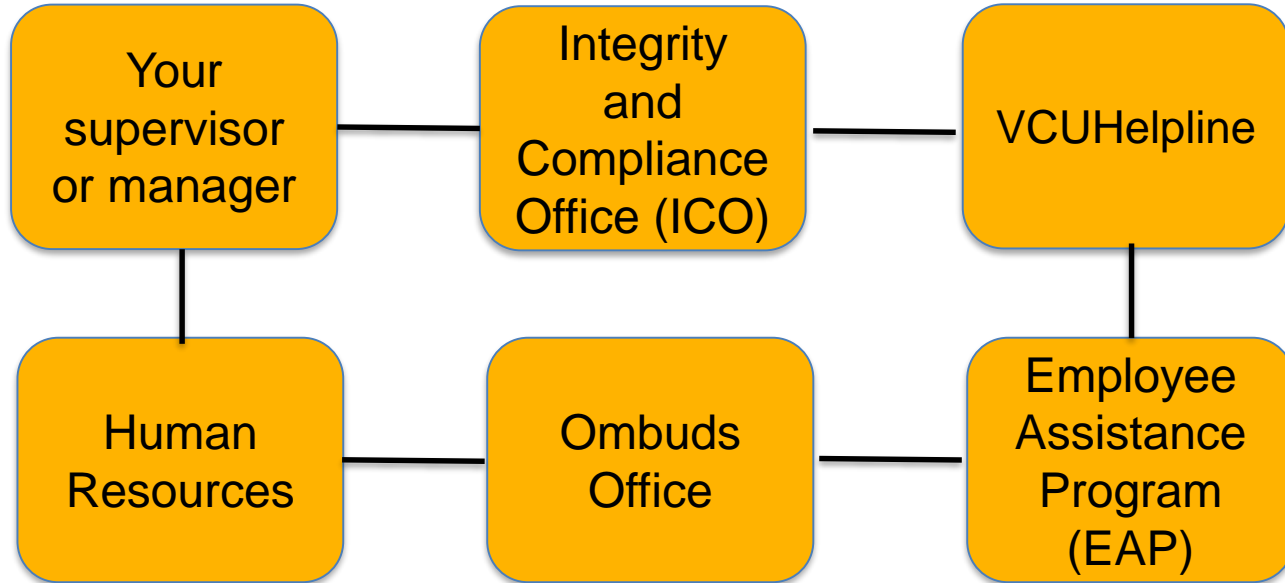
We hold all faculty and staff to the following *Duty to Report* policy:

You are expected and encouraged to make good faith reports of

- ✓ Suspected or actual cases of fraud, waste or abuse
- ✓ Violations of laws and regulations
- ✓ Violations of the Code of Conduct/Ethical Standards
- ✓ Violations of our policies and procedures

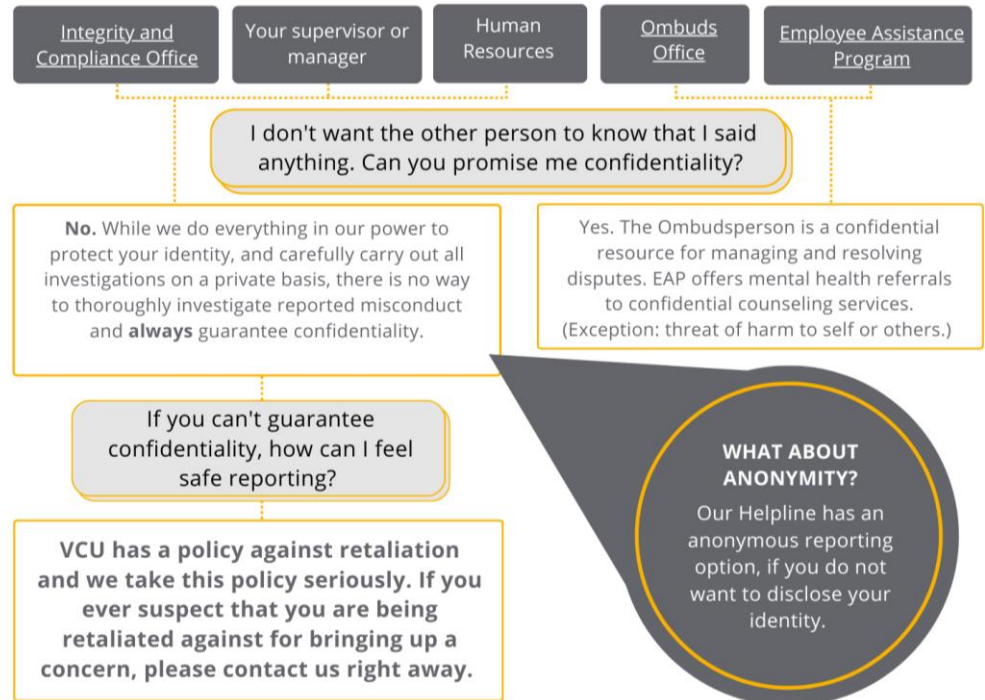
Speaking Up

You have several options for speaking up:



What Happens When I Speak Up?

- Our office oversees an internal investigation, based on your report.
- Depending on the way that you made your report you can remain anonymous, or you can share your identity knowing that we will keep the names and the details from the report confidential.
- Want to know the difference?



Confidential vs. Anonymous vs. Private

- This table illustrates the difference between these three concepts.
- Use it to help you decide which reporting option is right for you.

	Resources for Reporting Concerns or Receiving Support in the Workplace	Ombuds Office	VA Employee Assistance Program	Office or Unit Management	Human Resources	VCU Helpline
IDENTITY PROTECTION	Confidential Your identity is never shared except in cases of immediate threat of harm to self or others.	✓	✓			
	Anonymous You have the option of choosing not to include your identity in your report.					✓
	Private Your identity is carefully guarded, but confidentiality is not guaranteed in the course of investigating the concerns.				✓	✓


Non-Retaliation: You Are Protected

If you raise a concern in good faith with Integrity and Compliance or your manager...



then no one can



Terminate you


Cut your pay


Demote you


Refuse to promote you



Reassign you



Give you a bad review

solely because you spoke up.

And if anyone tries


Contact Integrity & Compliance


So we can investigate


And take appropriate action

We do not tolerate retaliation. Period.

'Tis (Almost) the Season...for Gifts

As a VCU employee, you cannot accept gifts, gratuities, favors or rewards in exchange for performing your professional duties.

As a faculty member, you might be offered gifts from students, families of students, potential students, job candidates or research partners. Examples of gifts you generally cannot accept include:

- ✗ Cash
- ✗ Services
- ✗ Loans
- ✗ Discounts
- ✗ Tickets
- ✗ Travel or transportation
- ✗ Gift certificates or cards

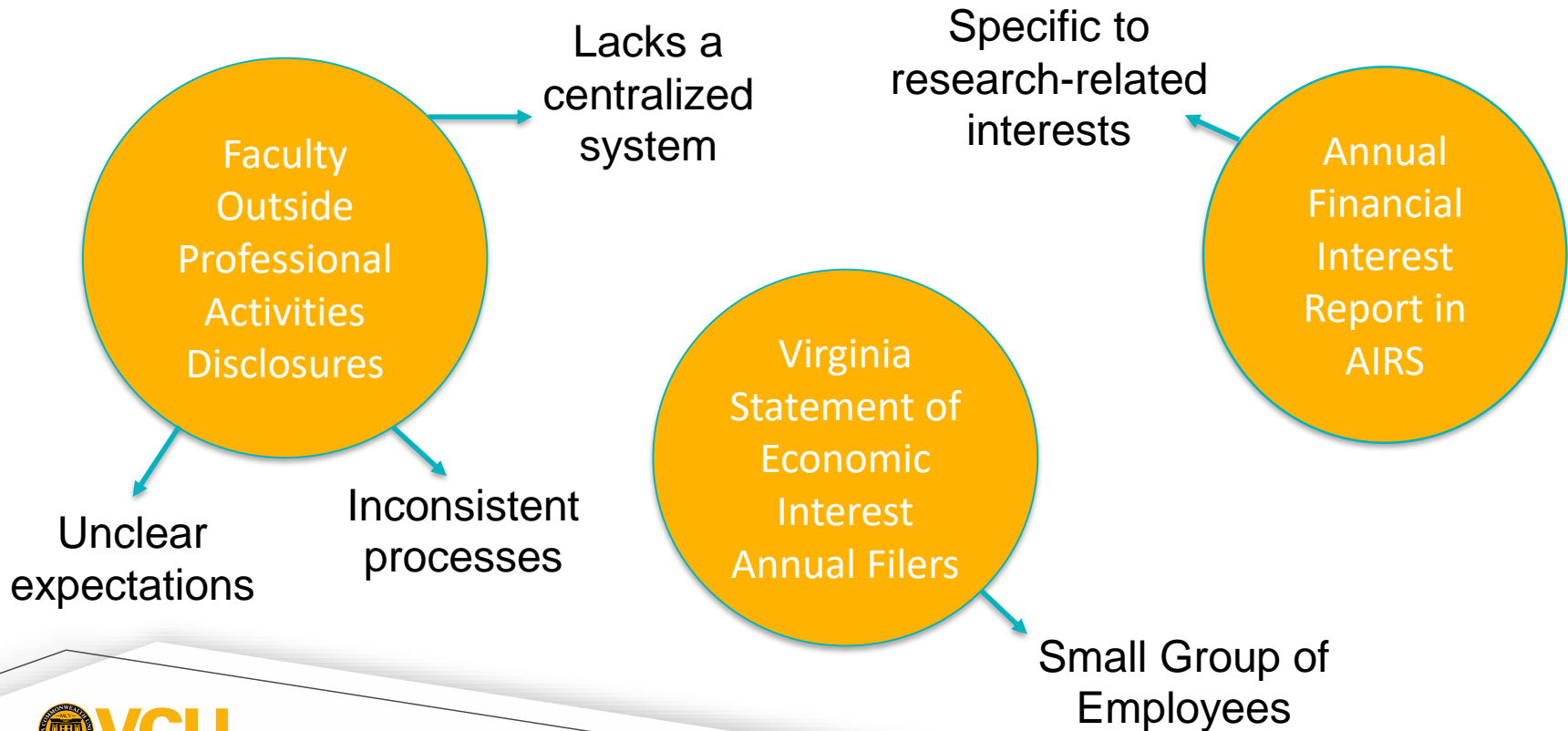
If you have questions about whether you can accept a gift, please give us a call.

Update: New COI&C Policy

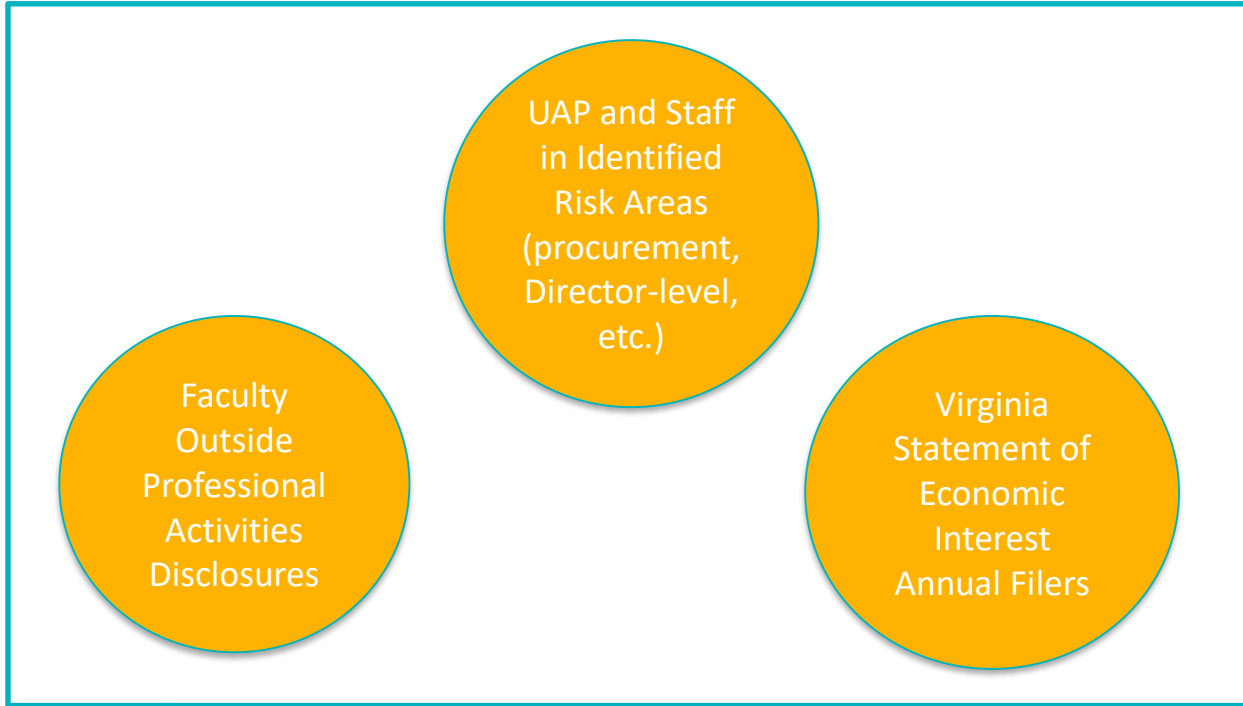
What are conflicts of interest or commitment?

- A Conflict of Interest (COI) occurs when **outside interests or relationships** (financial, personal, or other) **create a risk** that professional judgment or actions regarding university interests will be unduly influenced by a secondary or personal interest.
- A Conflict of Commitment (COC) occurs **when outside activities interfere with** or compromise an individual's ability to meet **university responsibilities or obligations**, consistent with their employment or appointment.

Current COI&C Reporting



New COI&C Policy:



↓
OVPRI will continue to administer annual FIR for research-related disclosures

Centralized COI Reporting System

- Annual disclosure questionnaire
- Convenient link for “just in time” disclosures throughout the year

app.convercent.com/en-US/MyActionItems

My Action Items

TO DO (1) COMPLETED

Conflict of Interest Disclosure Questionnaire

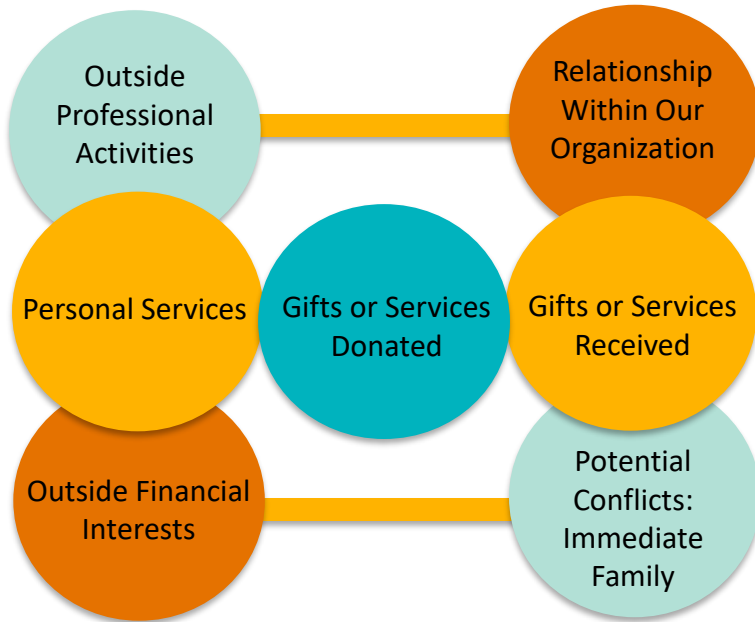
VCU Interest Disclosure Questionnaire
Questionnaire
OVERDUE

Start

Current Practice vs. Convercent

In line w/peer universities		
Compliant w/state and Federal regulations		
Centralized easy-to-use digital system		
Adequately manages COI&C risks		

What Will You Be Asked to Disclose?



You Do Not Need to Disclose:

- Charitable or Religious Donations
- Political Activity or Donations
- Membership in Community Organizations (ex: Little League or Condo Association)

Why Are You Being Asked to Disclose?

To protect
you

To be
compliant

To protect
VCU

- Conflicts are not inherently bad!
- Proactively managing potential conflicts ensures that we mitigate problems before they occur.

Timeline + How to Give Feedback

- Fall 2022: Pilot Program in Several Academic Units + Interim COI&C Policy
- Spring 2023: Permanent COI&C Policy goes through Approval process (including time for public comment)
- Fall 2023: First annual COI&C questionnaire sent out university-wide

Give feedback via Google form:

<https://forms.gle/Ten1ZvMWJxZSEHGo7>



Follow the link or scan the QR code with your smart phone's camera to make comments!