



WILLIAM & MARY

CHARTERED 1693

COMPLIANCE & ETHICS PROGRAM EFFECTIVENESS

FY2017 Metrics

Audit & Compliance Committee, November 2017

C&E PROGRAM

W&M must “evaluate periodically the effectiveness of the organization’s compliance and ethics program....”

Board must “exercise reasonable oversight” of the program and its effectiveness.

PROGRAM ELEMENTS

1. Policies
2. Organizational structure & CECO
3. Due diligence in hiring
4. Education/awareness
5. Monitoring & evaluating
6. Incentives & remediation
7. Risk analysis

POLICIES AND PROCEDURES

- Adopted 10 new institutional policies
- Amended 5 others

EDUCATION & INCENTIVES

- Significant activities:
 - 2017 Haven Training
 - COI training
 - Clery Act education
- Improved accountability

PROGRAM ELEMENTS

- 1. Policies**
2. Organizational structure & CECO
3. Due diligence in hiring
- 4. Education/awareness**
- 5. Monitoring & evaluating**
- 6. Incentives & remediation**
7. Risk analysis

MONITORING & EVALUATION: 2017 ARMICS Assessment

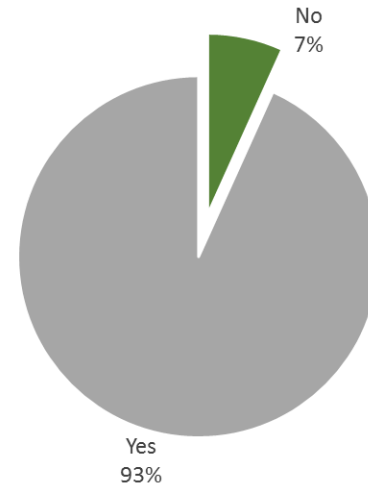
- Survey on management of public resources; internal controls.
- 2,744 W&M and VIMS faculty and staff surveyed; 563 returned survey fully completed (approximately 20.5%).

ARMICS SURVEY: Awareness of Policies

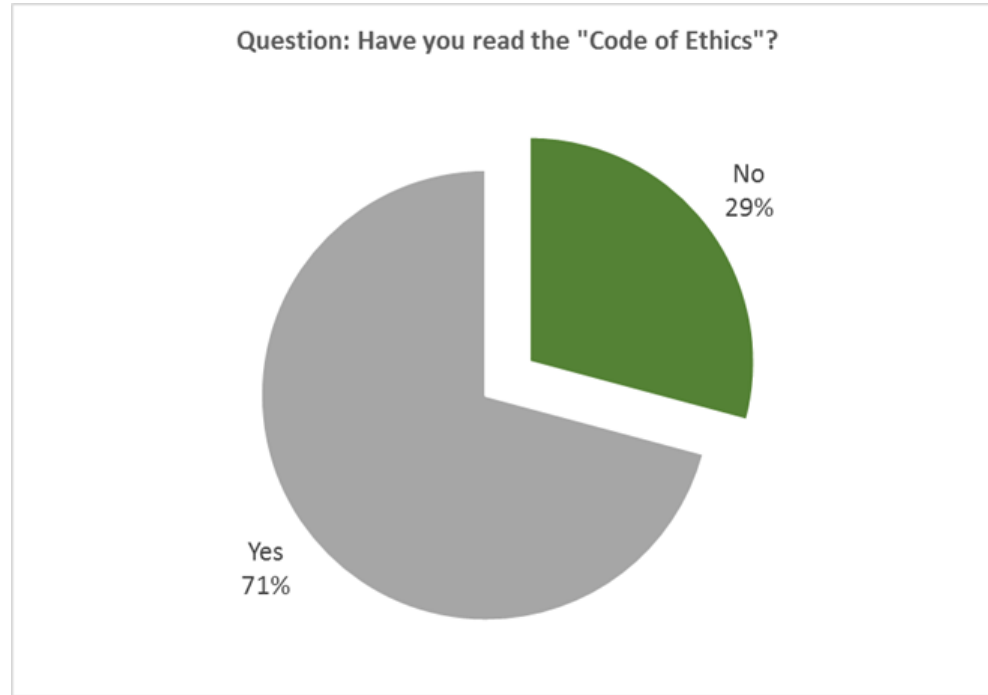
Question: Did you know the University has a published "Code of Ethics"?



Question: Did you know the University has published policies on its Web site?

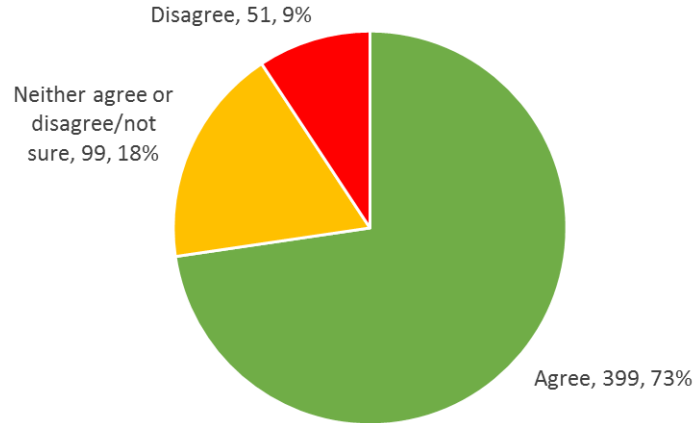


ARMICS SURVEY: Code of Ethics

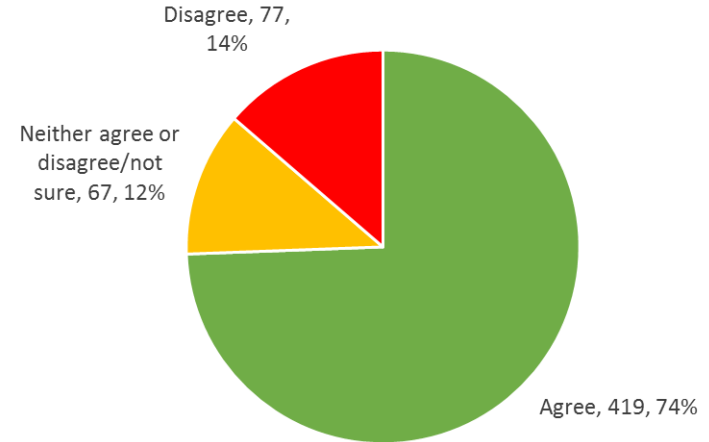


ARMICS SURVEY: Ethical Culture

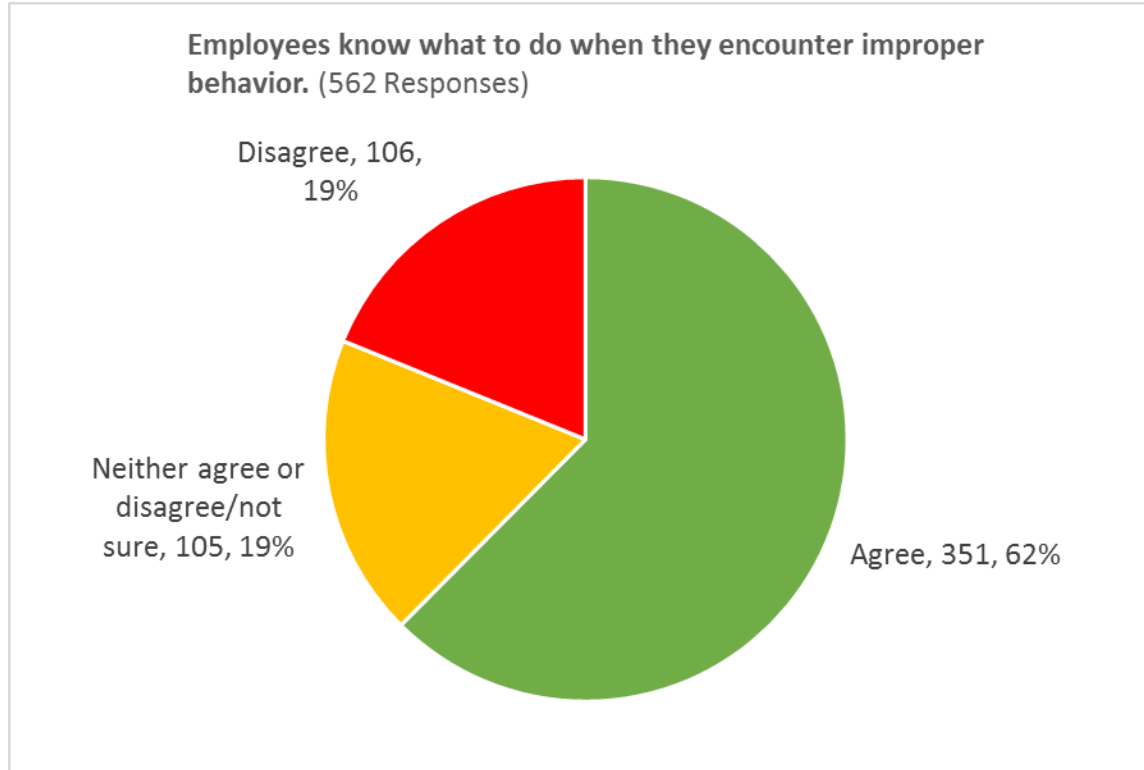
Management frequently and clearly communicates the importance of integrity and ethical behavior. (549 Responses)



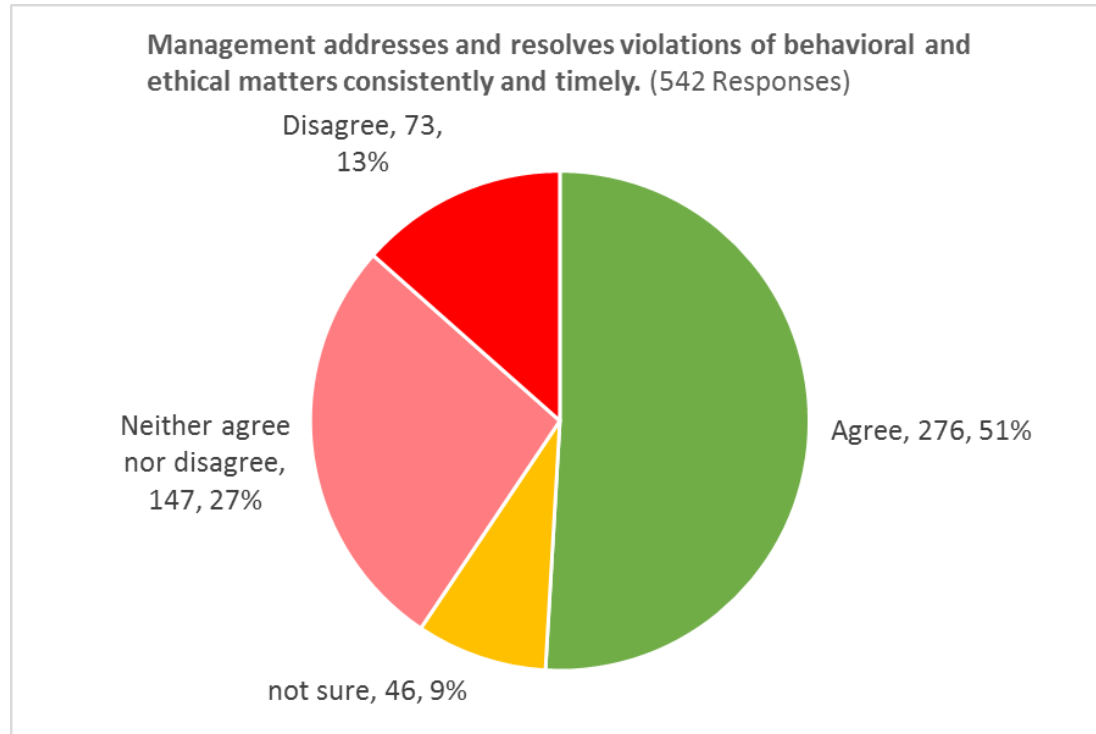
Employees fully and clearly understand what behavior is acceptable and unacceptable. (563 Responses)



ARMICS SURVEY: Ethical Culture



ARMICS SURVEY: Ethical Culture



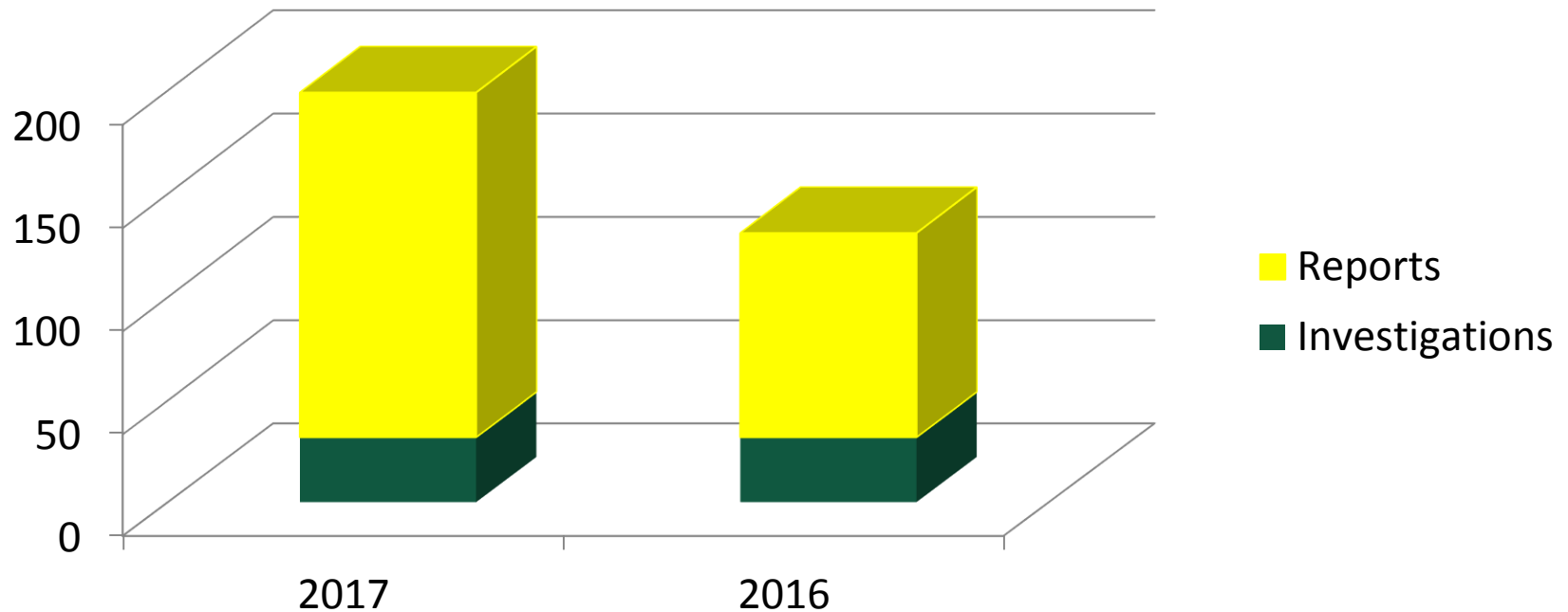
MONITORING: Reports & Investigations

- Reviewing report data shows:
 - Employee awareness of reporting mechanisms
 - Employee confidence in investigation systems
 - Whether misconduct is occurring
 - Compliance staff activities

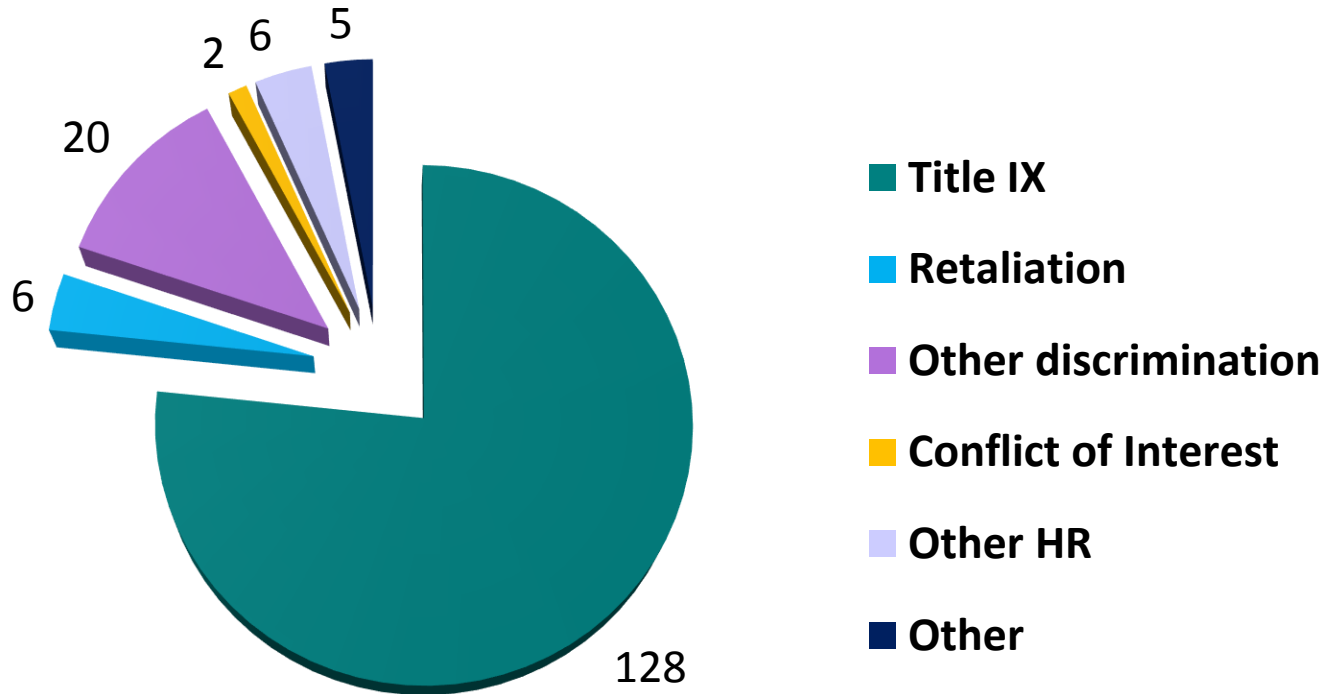
MONITORING & EVALUATION: FY 2017 Reports & Investigations

- Total 167 reports received
- Total 32 investigations conducted

ANNUAL COMPARISON



TYPES OF ISSUES REPORTED



EMPLOYEE REPORTS

- 52 reports in FY 2017
- Report volume per 100 employees
 - W&M = 2.08
 - Median = 1.4 reports* (range = .03 – 10.0*)

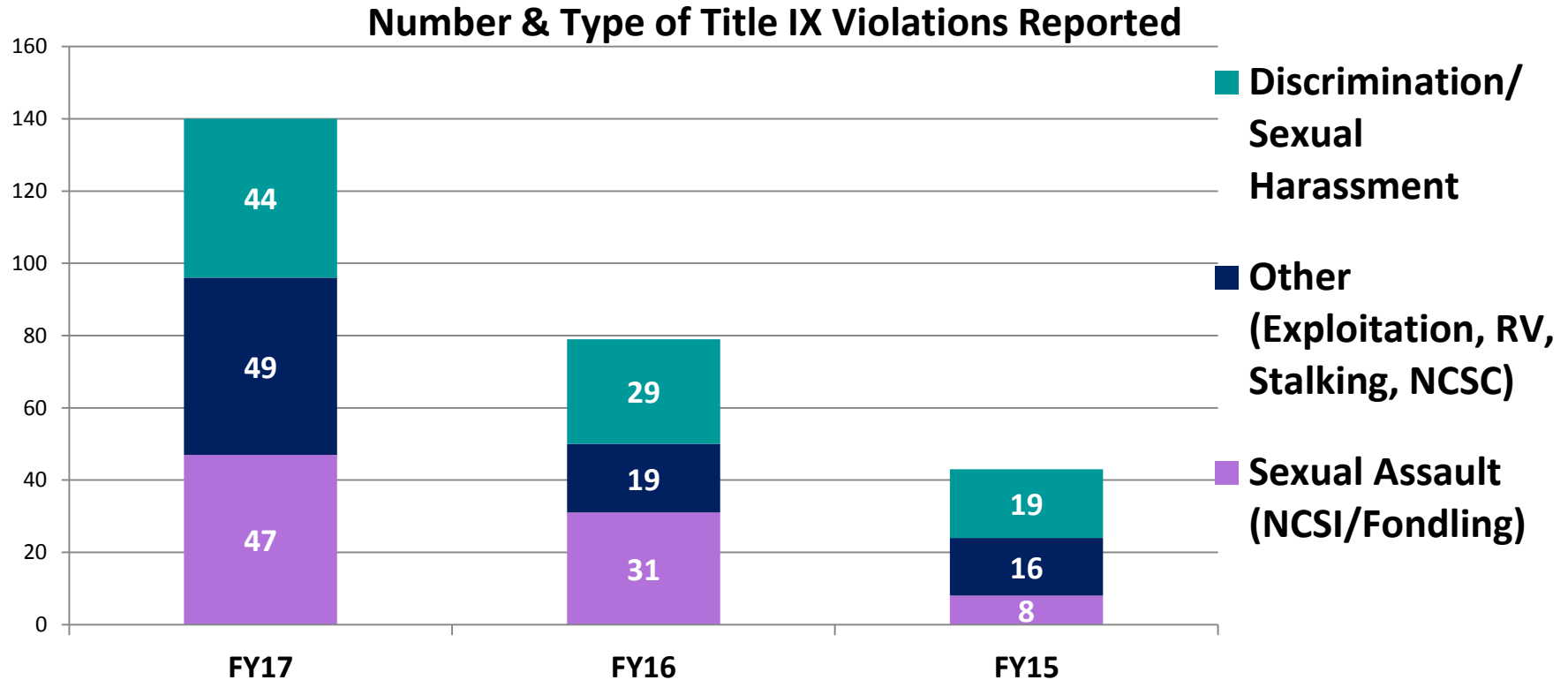
* Navex Global 2016 survey data of 2,382 hotline and incident management clients

SUBSTANTIATION RATE

The percentage of investigations of employee matters that resulted in a finding of a violation:

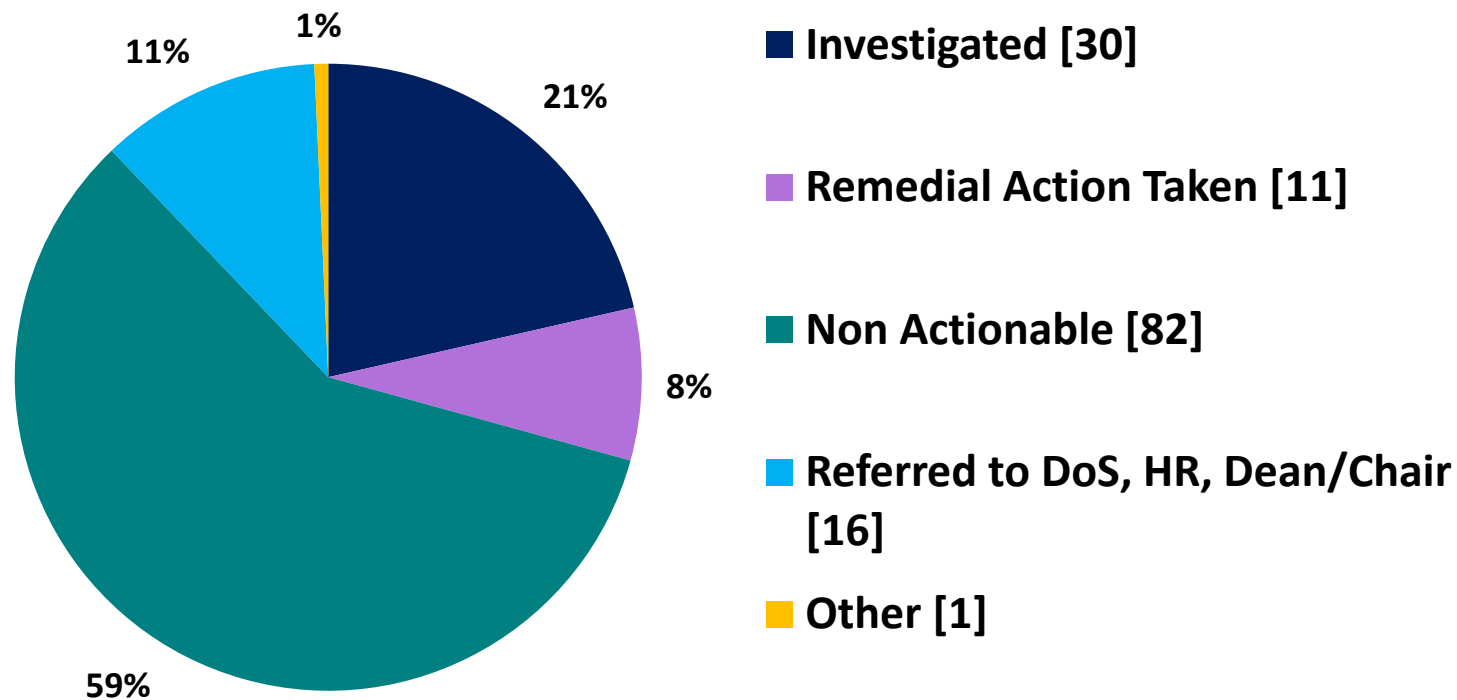
- 2017: 64%
- 2016: 47%

ANNUAL TITLE IX /VAWA DATA



ANNUAL TITLE IX /VAWA DATA

FY17 Sexual Harassment & Assault Response to Allegations Reported



ANNUAL TITLE IX/VAWA DATA

21 sexual misconduct investigations

- 10 had a finding of at least one policy violation
 - 1 Permanent Resignation prior to conclusion
- 1 investigation ongoing

TITLE IX/VAWA & LAW ENFORCEMENT

- 19 Title IX Review Team reports to Commonwealth Attorney*
- 8 investigations by WMPD
 - 5 arrests

* these reports describe the type of offense reported, the date of the offense (or approximate date); details of the report; whether or not there is a campus or criminal investigation (or describes no investigation due to lack of information or wishes of the reporting party)



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Q1 TITLE IX/VAWA DATA

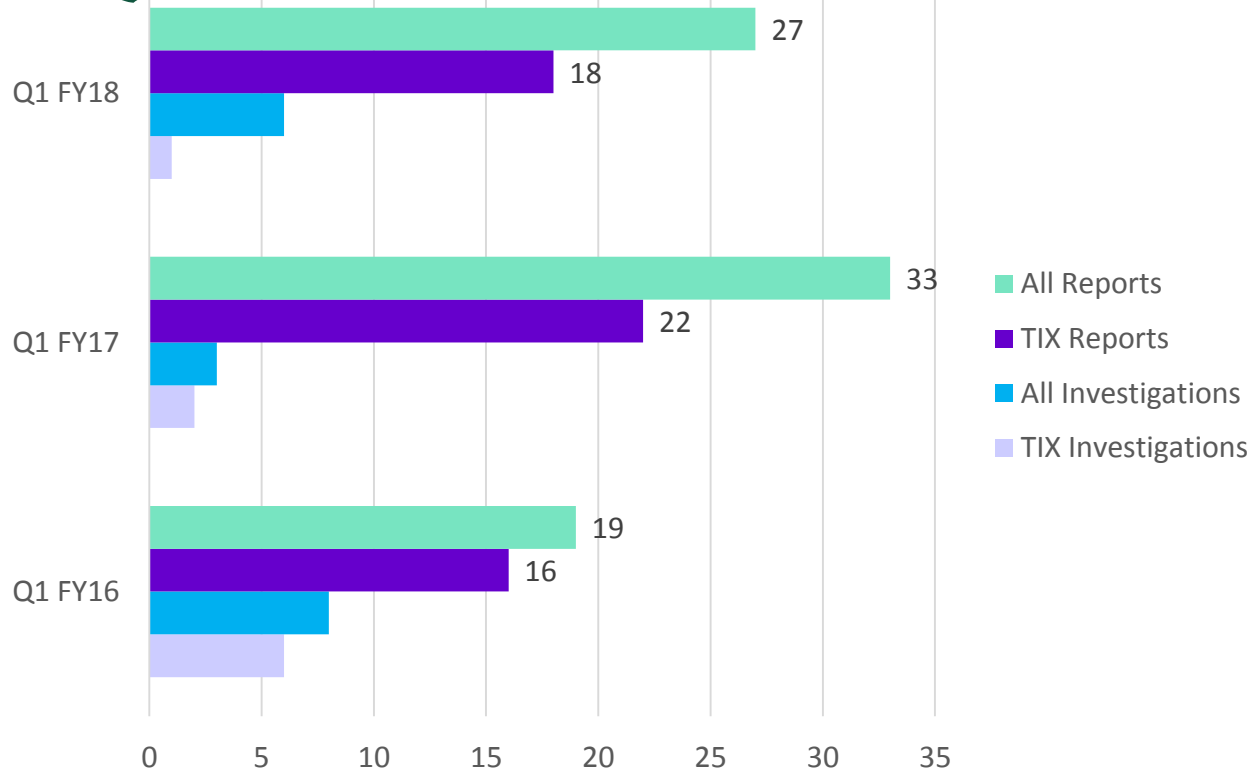
Audit & Compliance, November 2017

Kiersten Boyce, Chief Compliance Officer/Title IX Coordinator

Q1 FY18 REPORTS

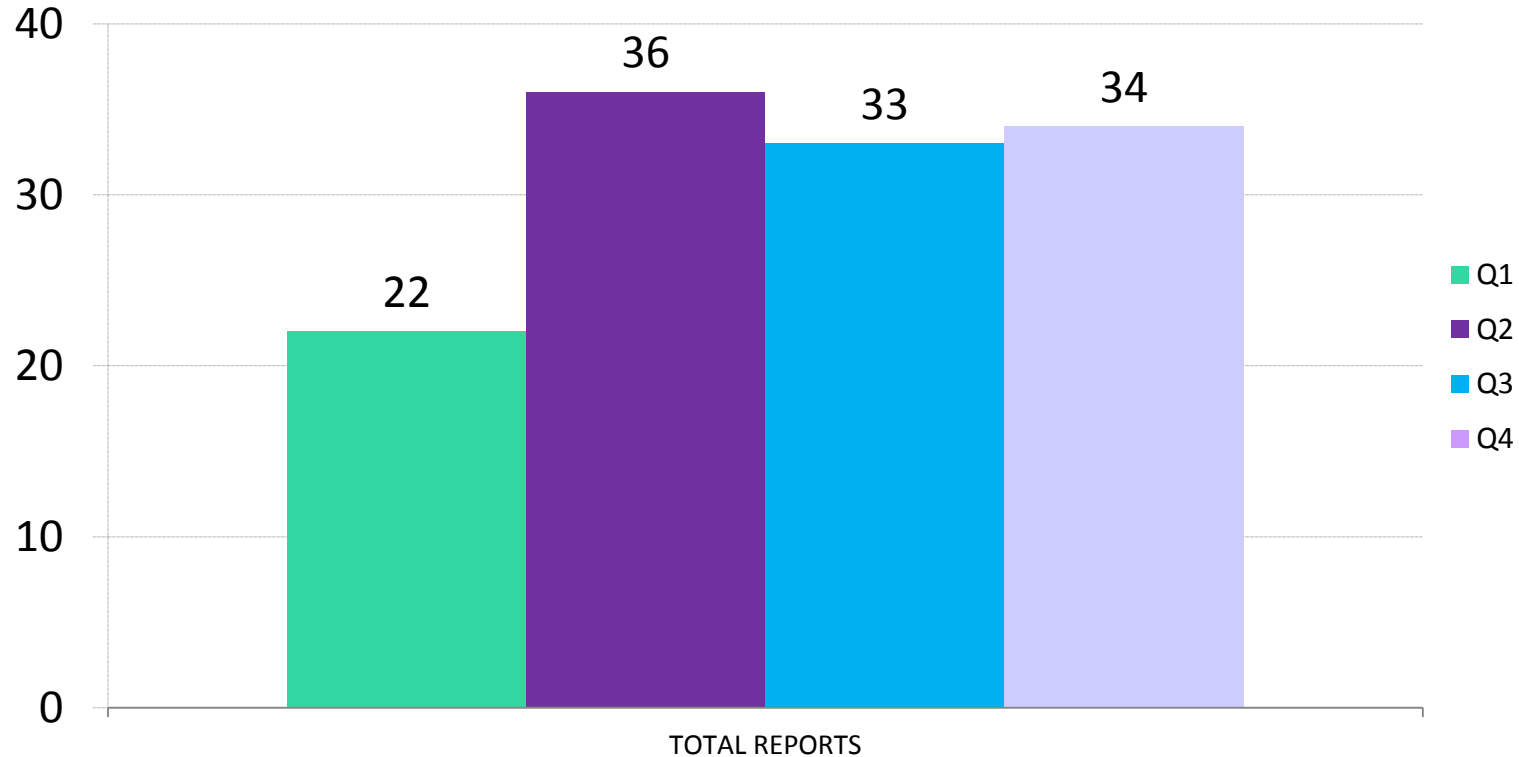
- 27 Reports Received
 - 18 Title IX
 - 6 Other discrimination/harassment (ADA, Race, Unknown)
 - 1 Workplace Violence
 - 1 FLSA/Wrongful employment termination
 - 1 Code of Ethics
 - 2 Retaliation (in conjunction with report of harassment)

FIRST QUARTER DATA COMPARISON



TITLE IX /VAWA DATA FY17

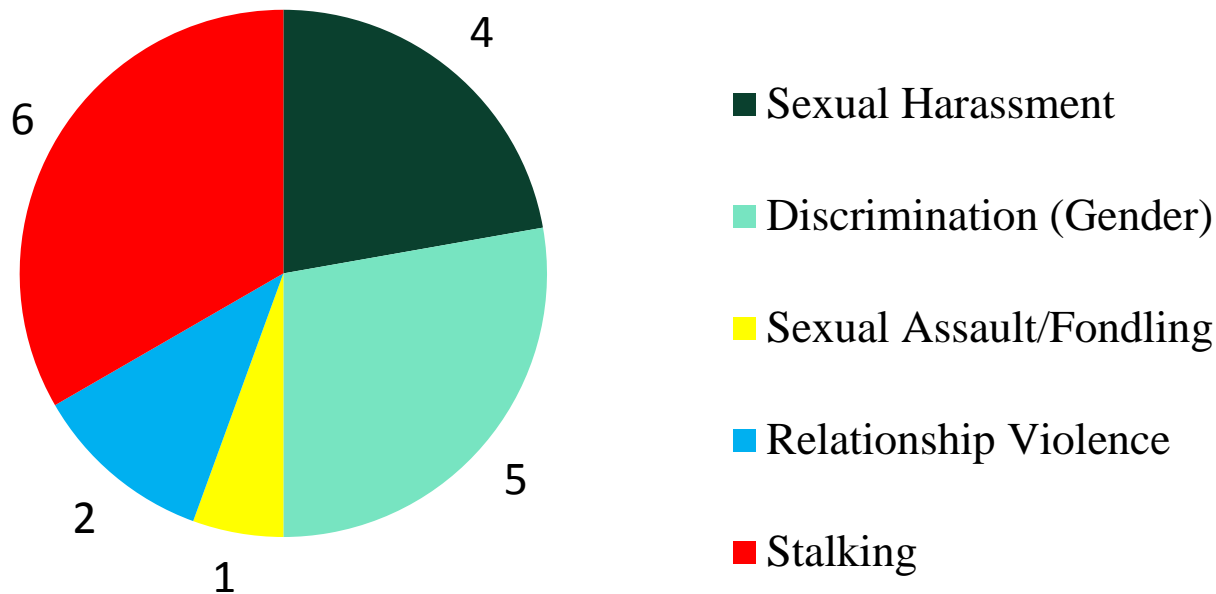
QUARTER BY QUARTER COMPARISON



TITLE IX /VAWA DATA

FIRST QUARTER FY18

Allegations Reported by students, faculty, staff



TITLE IX /VAWA DATA

FIRST QUARTER FY18 (JULY-SEPTEMBER)

Disposition of reports (18 total):

- 2 investigated (OCR and policy/procedure investigation)
- 10 Non-Actionable (no jurisdiction, no investigation wanted by reporting party)
- 1 Referred to Law Enforcement (WPD)
- 5 Remedial Actions (no contact order, safety plan, further inquiry, facility improvements)