

Creating a Culture for Ethical Conduct and Compliance

May 14, 2013

Colleagues and Students,

In my nearly two years with you, I have been amazed time and again by the work you do and by the breadth of this institution, whose importance is felt so profoundly across the Commonwealth and our world.

I have also been continually gratified by the manner in which you do that work. There is an unceasing, deep commitment at the University of Kentucky to not only accomplishment, but as importantly, to doing things the right way.

After all, thousands of students each day are entrusted to us. Patients from across the state, often facing the gravest of circumstances, depend on us for both quality and privacy in the care we provide. Our colleagues, working in research labs across campus, perform incredibly complex work, under often intense pressure, to achieve results that transform communities and change lives.

With such an expanse of effort, substantial scrutiny of our work is inevitable. It is important that our stakeholders – our students, our patients, our alumni and friends, and the people of Kentucky and their policy-makers – hold us accountable for the way we do our work. More importantly, we must hold ourselves to an uncompromising standard of ethical behavior and cultivate a culture of compliance and integrity across our campus.

Today, the University of Kentucky Board of Trustees made clear their continuing interest in and strong commitment to a culture of mutual respect and compliance. They gave a First Reading to changes in our University's Governing Regulations that strengthen and clarify the institution's commitment to ethical behavior. You can find their action in [President's Recommendation 4](#) of today's meeting. This action grows out of recommendations from a workgroup of faculty and staff I formed shortly after my arrival to examine our policies and processes related to ethical principles and codes of conduct.

How do we work together to continue to facilitate a culture of mutual respect and compliance?

First, we must all be vigilant in our resolve to speak up when we see activity that raises questions. That process, as with so much else, starts with education. We must all be committed to understanding the regulations in place at the university that help guide and govern ethical codes of conduct and compliance. A good start is with the university's [administrative regulations](#) governing ethical conduct.

Second, we should be open to change when we see gaps or areas where we can do better. The Provost's office and Faculty Senate Council have been reviewing for some time where revisions or changes may be necessary to strengthen these rules of the road for ethical conduct.

The goal should always be to make our regulations as clear, as simple and as straightforward as possible. As that process continues, under the guidance of a new Provost and in consultation with

faculty leaders, I will keep you fully informed.

Further, a committee I formed several months ago -- composed of administrators, staff and faculty from every corner of the institution -- has been charged with, among other things, evaluating our compliance standards and reporting procedures.

They are considering fundamental questions with respect to compliance and risk: Are we making it as easy as possible for our colleagues to recognize potential ethical problems and report them when they occur? Are there gaps in our processes, designed to cover areas of compliance and ethical conduct? Do we provide the range of services and resources -- from counseling and safety to internal auditing and risk management -- to assist in our compliance efforts? And are those services readily accessible and understood?

Third, we must remove barriers -- where they exist -- to raising questions or speaking up. Concerns should always be raised first with your direct supervisor and proceed through additional steps. Our units function best when there is open dialogue.

But at times, there is an understandable reticence about speaking up, particularly when those questions may be pointed toward those in management or positions of authority. We have created compliance phone lines -- and in some cases web-based reporting services -- that allow people to report questionable activity. In virtually every imaginable circumstance, such questions can be raised anonymously.

You can learn more about the options for reporting potential ethical violations at <http://www.uky.edu/compliance/>.

The bottom line is that a critical component of a culture of compliance is one where people throughout the institution can report problems when they see them without fear of retaliation. That's a tone I must set and an expectation I must communicate constantly throughout the institution.

And it's a tone that must be established and modeled every day by every manager. Through our Human Resources Division, we require training for every manager, a component of which is more fully understanding and appreciating the dimensions of ethical behavior and the importance of an environment where our colleagues feel free to report problems when they occur.

At the same time, our Office of Institutional Equity and Equal Opportunity provides training for departments throughout the university, particularly with respect to the expectations established by Title IX. That federal law prohibits any manner of sex discrimination at an educational institution.

Our Institutional Equity officers have conducted training on all harassment and discrimination issues, including Title IX, for dozens of departments across UK in the past 12 months. They can be reached online at www.uky.edu/evpfa/eo, where you can find more detail about all of our institutional equal opportunity policies as well. I urge managers and departments to avail themselves of this important educational option. We will all be better for it.

Finally, even with those avenues to report potential problems -- and with the increasing options for training at our disposal -- we must be open to more that we can do as colleagues, and collectively as

an institution, in creating the culture we all want for UK.

Day in and day out, the vast majority of our colleagues and our students work incredibly hard, doing outstanding and important work. And they do that work with a deep sense of pride and integrity.

They are inalterably committed to achieving the right results in the right way.

When that doesn't happen -- or when questions about behavior that could tarnish the institution are raised -- we must be vigilant in pursuing the right course, no matter where it takes us.

It's a commitment we must all share as we seek to model the values that guide our institution.

Thank you for all you do to make those values real every day.

Eli Capilouto
President