

Organizational Ethics Education and Training: A Study in the Use of Best Practices

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With ever-increasing global competition there is added pressure for employees to achieve more ambitious performance goals while also addressing more complex ethical issues. As organizational members move to face these concerns they must also understand and follow both existing and new regulations. This means that those responsible for organizational ethics education and training must ensure that employees adhere to ethical practices as a part of their everyday work routines.

To learn what are regarded as the most effective practices for in-house training, a study was undertaken to answer these questions: *What are the commonly reported best practices in organizational ethics education and training? Are these practices being utilized by organizations? When comparing best practices with current efforts, what trends emerge that can inform and guide program improvements?*

A best practice is a technique, process, or methodology that, through experience and research, reliably leads to a desired outcome. The reason for identifying best practices and applying them is to reduce error and dysfunction and to provide an effective means toward improvement. A criticism is that they are inherently historical. In other words, they contribute to the achievement of some *past* objective. Therefore, current conditions do not ensure repeated

success, especially in changing environments. It can also be argued that because a best practice has stood the test of time, it is steadfast and durable. While the adoption rate is not as high as might be expected (Ungan, 2004), an examination of best practices can add value by instilling awareness and promoting idea generation that can contribute to organizational development.

The intention of this work is not to determine program effectiveness, nor to validate the effectiveness of any particular practice. Rather, the goal was to help those responsible for training garner insight for potential program improvement. As an action research investigation, the study was designed to be a catalyst for dialogue—to serve as a platform for ethics program networking toward collective development among the participants.

The first phase of the study identified sixty-five best practices in organizational ethics education and training as reported in academic and practitioner journals. The second phase was an inquiry with nine companies in the Western United States. Leaders within these companies expressed an interest in ethics program improvement. Interviews were conducted with an ethics official representing each organization with a goal to: a) understand the nature of their in-house program, b) determine what best practices are being used and their value and, given the findings, c) consider the adoption of practices to improve their program.

General findings from this investigation suggest that programs typically:

- Provide ethics training at the time of hire.
- Provide training in an online delivery format that reaches most employees bi-annually.
- Cover salient ethical issues, known problem areas with topics that address rules, policies, regulations, compliance requirements and corporate values.
- Offer supplemental information that is easily accessible via their corporate website.
- Communicate information about reporting mechanisms.

However, programs typically lack:

- Face-to-face training where reflection and dialogue can be used to practice ethical thinking and response actions with others.
- Integration between the in-house education and training department and those departments responsible for ethics (e.g., General Counsel or Ethics Department and Human Resources, or other training divisions).
- The use of risk assessment tools and ethical performance measures to manage ethical risk and inform ethics training.
- A focus on ethical competency development (e.g., emotional awareness and self-regulation).

A review of the study is presented in this paper, outlining the methods, analyses, findings and suggestions for future directions. Practitioners will want to focus on Table 3 (see Appendix p.

16). The findings are presented by best practice to describe:

- 1) Presence: How commonly are these best practices used?
- 2) Value: Do the participants believe that these practices add value to ethics training?
- 3) Combined contribution: The “presence” multiplied by “value.”
- 4) Desired adoption: Of those companies who do not use the best practice, their level of interest toward adoption.

Methods and Analyses

Phase One of the study examined the literature using ProQuest, ABI/Inform, ERIC, and the Business and Company Resource Center databases. Academic, educational, and practitioner journals were included, but the inquiry was restricted to articles published within the last five years. A variety of search strings and their derivations were used to identify the practices (e.g., “ethics training and organizations,” “organizational ethics,” “business ethics and training,” “management education,” and “ethics education best practices”). The author and five research assistants worked independently to procure articles and cull best practices in organizational ethics education and training, focusing on key areas including business management, education, human resources, organizational behavior, psychology, and training and development. A technique, process or method was considered a potential “best practice” if it was referenced in an

academic, practitioner, or training journal as an effective ethics training practice or a useful process to support ethics training in an organizational setting.

Once the preliminary list of practices was identified (over four-hundred), the author (lead researcher) combined similar items and then clustered related recommendations, naming them by their key themes (e.g., core issues, delivery form, and ongoing communications), which parsed into two main categories: content and context. *Content* describes the type of material and delivery form utilized, and *Context* describes the application of content and to communicate, assess, and measure ethics in the organization. For example, under *Content* is the theme of *Situations and Scenarios*, which consisted of several best practice items such as: a) uses ethical challenges or cases actually faced in the organization as the focus of training and b) solicits employees to submit areas of concern, key issues, stories, or ideas to use in training. Under *Context* is the theme of *Ethical Risk Assessment*, which consisted of several best practice items such as a) conducts formal risk assessments to identify areas of ethical risk and b) line managers have specific responsibility for managing areas of ethical risk.

Phase Two began with the preparation of an interview script with open-ended questions to learn more about the participants' organizations (e.g., type, structure, size) and their current ethics education and training programs. As an action research project, where participants take an active role in the development of the inquiry and its findings, the preliminary script and best practice list were examined by several participants, along with two ethics scholars and an organizational practitioner. The script and best practice list were pretested with two members of the sample population and three students. This effort helped to simplify and add clarity to the questions, themes, and items, resulting in a final list containing forty Content and twenty-five Context best practice items. While the thematic grouping of "Actions of the Board" did not

include best practices gleaned from the literature search, it was deemed worthwhile based upon participant request. These additional four items were provided by a participant and their inclusion was supported by others engaged in the study.

Ten corporations were recruited for this study based on their membership in a regional ethics organization in the Western United States. Members of these organizations responsible for ethics education and training expressed an interest in learning more about current best practices with an eye toward program improvement. A total of nine companies participated, as one was not available during the interview period. Participants' roles varied, including VP of Human Resources, CEO, Director of Ethics, General Counsel, and other ethics officials. The companies ranged in size from 900 to 150,000 employees, engaged in international markets,¹ and their industries included service, healthcare, and manufacturing.

The author (also lead researcher) conducted all of the interviews. The participants were guided through the script and then discussed the 69 specific practices identified in Phase One of the study. Participants were asked to indicate the presence of each item (yes, no, or limited, coded as 1, 0, and .25, respectively) and, if the practice was employed, its degree of value, or perceived importance to the organization (using a 1–7 Likert scale, 1=not at all to 7=extremely). If the practice was not used, participants indicated if they would like to adopt it (1=yes, 0=no). The tape-recorded interviews lasted 60–90 minutes and were transcribed verbatim.

Quantitative and qualitative analyses were performed to prepare descriptive statistics and interview summaries. The intention was to identify the best practices being utilized within each organization, providing a kind of ethical “check-up” for each of the participating organizations, and then to identify patterns in the overall dataset. Because no values were assigned to the best practice items by the researcher, no judgments were made as to the effectiveness of any program.

¹ One exception: the healthcare organization is a domestic operation.

Rather, the list served as an inventory of items to facilitate a comparison between recognized best practices and the organizational programs. The analyses examined cumulative scores for each item, which were then grouped by themes within the categories to highlight areas of strength and challenges for potential future development. The transcripts were summarized independently by two research assistants (blind to any identifiers) using open coding from ground theory technique (Strauss & Corbin, 1990). This information provided explanatory details about the nature of each organization and its training program.

Findings

The mean scores by best practice item were calculated and aggregated, providing cumulative scores for presence and value by theme within the two categories (see Table 1). The Combined Contribution score is the product of presence and value (1=low presence/low value and 7=high presence/high value). As might be expected, if a theme is highly valued it is likely to be included in the organization's program. Those cases where inconsistencies emerged between presence and value provide fodder for additional examination. It should also be noted that the cumulative means for any given theme may differ from the individual means for the individual best practice items within that grouping. Thus, to fully understand the data, both the themes and their representative best practice items needed to be examined. For a complete detailed account refer to Table 3 in the Appendix. The final column in Table 1 reflects the mean for the number of companies that indicated a desire to adopt some or all of the best practices within a theme if presently not in use.

Looking first to the Content category, the theme of *Core Issues* shows strong presence at .81 with high value (6.37); thus, its Combined Contribution is also high (5.15). In order of presence,

Specific and Explicit Behaviors follows with nearly 70% presence. The reduction is explained by the lack of presence for several items within this theme, including “*Employees learn how to openly discuss the implications of their actions, practicing transparency and openness as part of workplace routines*” (.25). *Situations and Scenarios* and attention to *Learning Styles* have moderate presence at .53 and .52 (respectively) with moderate value at 5.42 and 5.73. *Target Audience* and *Delivery Form* dip below 50% in presence, yet they are highly valued (6.28 and 6.32, respectively). This manifests in a lower Combined Contribution score (2.95 and 2.60), suggesting an area for potential development.

Table 1. Best Practices by Category: Presence and Value in Organizations (N=9)*

Best Practice Themes	Best Practice Presence (Mean 0-1)	Best Practice Value (Mean 1-7)	Combined Contribution (Mean 1-7)	Companies that Desire Adoption (Mean 1-9)
CONTENT				
1. Core Issues (3)	0.81	6.37	5.15	0.83
2. Specific and Explicit Behaviors (5)	0.69	6.10	4.23	1.20
3. Situations and Scenarios (5)	0.53	5.42	2.85	1.67
4. Learning Styles (6)	0.52	5.73	2.98	2.25
5. Target Audience (11)	0.47	6.28	2.95	1.64
6. Delivery Form (6)	0.41	6.32	2.60	1.50
7. Ongoing Reflection, Practice, and Dialogue (4)	0.32	4.68	1.48	4.00
CONTEXT				
1. Raising Questions and Promoting Awareness (9)	0.62	6.30	3.90	0.89
2. Commitment to the Code (3)	0.50	5.77	2.90	0.33
**Actions of the Board (4)	0.52	6.08	3.16	0.75
3. Links to Performance (3)	0.28	5.66	1.58	3.33
4. Ethical Risk Assessment (2)	0.25	6.00	1.50	3.50
5. Program Effectiveness (4)	0.20	4.65	0.93	4.00
6. Ongoing Communications (4)	0.09	6.25	0.58	4.25

*Presence is based upon 0=no, 1=yes, or .25=limited; Value (importance) is based upon a 1–7 Likert scale (1=not at all to 7=extremely); Combined Contribution is the product of Presence (mean) × Value (mean), product scores are based on computations using the full dataset; Desired Adoption represents companies (mean) who do not have one or more of the best practices within a given theme, but would like to adopt one or more of them.

***Actions of the Board* was not a best practice theme identified via the literature review in Phase One, but was added by participant request.

The best practice details (Appendix, Table 3) reflect that ethics training targeted to meet the needs of supervisors, managers, executives and the Board of Directors is quite limited. In addition, we can see that while the online form of delivery for compliance information is highly utilized (.78) and highly valued (6.86), the face-to-face form is used substantially less (.36), yet is valued (5.86). For *Ongoing Reflection, Practice, and Dialogue* we see decrease in presence (.32) and value (4.68), forming a very low Combined Contribution (1.48).

Taking this information together, there is perhaps irony in that the face-to-face form of delivery is considered a critical element in promoting reflection and dialogue, recommended for the practice of moral agency (Piper et al., 1993; Sekerka, 2008). The data reflect that almost half of the sample (four companies) would like to adopt best practices to cultivate *Ongoing Reflection, Practice, and Dialogue*. To understand why best practices may not be employed, or why a best practice is not valued, the qualitative data provided explanatory information. In this case the participants generally agreed that tailored face-to-face training to develop the practice of reflection and dialogue is useful and desired, but it is prohibitive given the expense. It is typically reserved for leadership, specialized groups such as Sales, or for when ethical problems emerge and corrective action must be taken.

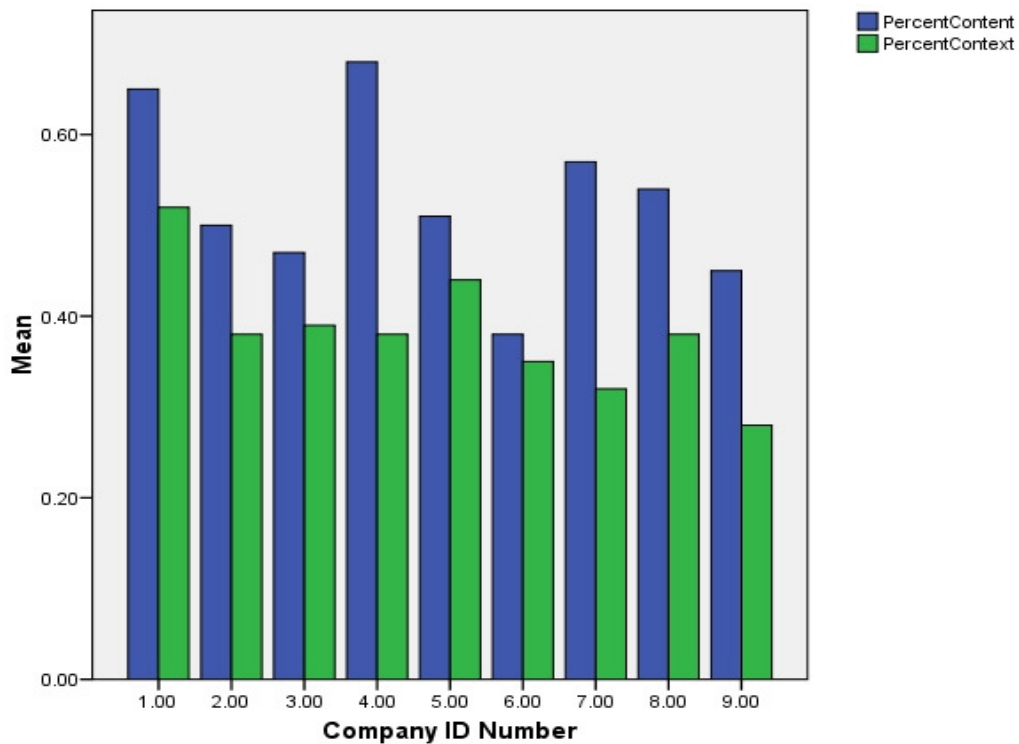
Overall, the Content category shows moderate presence for at least four of the seven themes. The overarching picture suggests that those responsible for ethics training try to ensure that issues related to salient ethical problems are identified and that scenarios to depict them are utilized in training. Participants described how their online tutorial sessions link specific behaviors to ethical action. Here, employees are typically asked to navigate through a series of questions where they are directed to choose an appropriate response by applying corporate rules to correctly address a series of issues.

Looking to next to the Context category, *Raising Questions and Promoting Awareness* has relatively strong presence (.62) and value (6.30). Roughly half of the organizations studied use the best practices clustered under the theme of *Commitment to the Code* (.50), with a mean value of 5.77. However the remaining themes under Context show a marked reduction in presence, as compared to those in Content, yet their value remained comparable. This is explained, in part, by three to four companies simply having no representation for four of the Context themes and desiring their adoption. Again, the qualitative data added insight, underscoring the difficulties that companies face in linking ethics with performance, tracking, measurement, and assessment. Participants consistently described challenges in linking ethics with performance. While special awards are often given for exemplary ethical behaviors, employers seem to be at a standstill when it comes to connecting performance objectives with ethical practices. Moreover, a number of participants expressed frustration about how to sustain ongoing ethics communications within their organizations. They seemed to be troubled by how to keep ethics on the agenda, making it fresh and interesting, and ensuring that leadership continually incorporates and/or integrates an ethics message into their communiqué. Until there is a specific problem, it is difficult to “make a case” for education and development beyond existing compliance requirements.

Because the organizational context for ethics education and training must support the application of the ethical content provided, the lack of presence for many of the Context best practices suggests that development is needed in this area. A disturbing trend is that several of the themes related to assessment and measurement reflect low means for presence and high means for value. To further illustrate this point, Figure 1 depicts the presence of Context and Content by company. Each organization is represented with two bars; the left one represents all of the themes under Content and the one on the right, those for Context. With the higher bars all

appearing on the left, the graph highlights a consistent focus on Content but a shortfall for best practices under Context. If employees are expected to comply with regulations and exercise corporate values in their daily task actions, processes that promote dialogue, identify ethical risks, and link ethics with performance are needed.

Figure 1. Percent of Best Practices by Content and Context (N=9)



* Based upon the best practice themes for Content (40) and Context (25); *Actions of the Board* is not included.

Finally, it should be mentioned that while *Actions of the Board* was not a best practice theme identified in the literature review (its inclusion was requested by participants), its contribution is noteworthy. The details here reveal that only two of the four items representing this theme were typically present, yet it remained a substantial theme (.52 presence) relative to those within the Context category. Consistent with other findings, the item that explicitly links

ethics and performance for the Board of Directors lacked presence (.14) but was high in value (6.00).

Table 2. Strengths and Challenges in Organizational Ethics Content and Context

CONTENT	CONTEXT
STRENGTHS	
<ul style="list-style-type: none"> • Use relevant issues that target problem areas. • Focus on prevention of unethical behavior and promotion of values. • Describe and define ethics as applicable to daily tasks. • Address key compliance requirements, such as reporting channels and whistleblower protection. • Use of online delivery reaches all employees, typically upon hire and then biannually. 	<ul style="list-style-type: none"> • Reporting mechanisms are in place. • Code of Conduct ethics policy is easily accessible, typically through a website that also provides supplemental question/answer section. • Code of Conduct is available in multiple languages and typically signed by all employees.
CHALLENGES	
<ul style="list-style-type: none"> • Online delivery promotes awareness but does not encourage reflection, practice, and dialogue. While outcomes associated with face-to-face delivery are desired, time, interest, and resources restrict applications to special groups or when problems arise. • Training efforts can become siloed in larger firms, detracting from ethics integration and a competency development approach. • Organizations assume employees will exercise values in resolving ethical challenges: “We only hire ethical people.” • No ethics training for vendors, suppliers, and partners. • Employees are not petitioned for their personal stories or for insights on cases or issues to be used in training. 	<ul style="list-style-type: none"> • Lack a sustained ethics message in corporate communications (e.g., publications, events, announcements, and leadership messages). • Employees are not included in the process of ethics program efforts, training, and Code of Conduct development. • Ethical risk assessment tools are rarely applied. • Managers do not explicitly assume responsibility for handling areas of ethical risk (a reaction orientation dominates: focused attention on problems after they emerge). • Ethical issues are not regularly addressed at staff meetings. • The link between ethics and performance goals is vague—if present. • Focus is on training rather than education; the goal is to disseminate information rather than to foster personal and organizational development.

The findings suggest that there are specific strengths and challenges observed in both content and context for training deliverables (see Table 2). While current approaches are intended to heighten awareness and understanding of company rules, policies, and values, practice of their application is limited. In cases where face-to-face training is employed, there is little emphasis on the development of ethical competencies. Moreover, the link from ethics to

performance is vague—at best.

Given these findings, perhaps a shift in how we view ethics training is needed. Rather than being contained as a one-way activity, how can it become more interactive—a process whereby employees can openly discuss their ethical issues with others? In addition, while participants were generally quite adamant about the inclusion of core values in their programs, there seems to be predominant perception that the ethical history of the organization influences its current identity. This is a potentially dangerous assumption, believing that employees can transfer values and content knowledge without the development of workplace routines and social norms that cultivate an active identity through daily actions. Again, this points to the importance of establishing an ongoing dialogue, one that instills individual and collective attention to achieve ethical performance in daily task actions.

Limitations and Conclusion

The intent of this research was not to validate the best practices but to generate a better understanding of how ethics education and training is currently being conducted in several organizations. Readers should be reminded that presence and value were not precise measurements, but based upon input from in-house ethics program experts. Thus, if a participant said that a particular best practice was in use, or present in a limited way, the numerical scoring provides insight rather than precision. A complete review and analyses of the organizations' processes, practices, and procedures was beyond the scope of this study. Important information can be gleaned from such a process, which should certainly be undertaken in future research.

In addition, the small sample of self-selected companies was drawn from one particular region of the United States, thus limiting the generalizability of the findings. Empirical work is clearly needed to test the validity of the best practices in different types of organizations with a

consideration of demographics, size, industry type, and culture. These limitations notwithstanding, results show how the training programs studied compared to reported best practices. The findings were shared with the participants, which contributed to collective dialogue regarding further development of their programs and planned initiatives.

The implications of this work suggest that a focus on ethical content is essential. But the treatment of content alone is an incomplete approach. The assumption that providing information ensures ethical behavior is risky—at best. Such assumptions presume that describing what people should do enables them to proceed accordingly. Needed are additional training activities that cultivate organizational norms to develop ethical thinking and support moral action. A greater focus on context implies that managers need to bring forward ethical issues in staff meetings, become aware of and responsible for areas of ethical risk, and link ethical practice to organizational goals. An emphasis on ethical competency development will help employees exercise ethics as an active “practice” rather than seeing ethics as a form of forced compliance.

Some of the participants, those managing ethics programs and the accompanying training efforts, expressed that employees should already know how to be ethical. And, if people do not know how to be ethical it is not the company’s responsibility to teach them how to behave appropriately. Some expanded upon this point, explaining their belief that you cannot teach ethics or morals to adults; people either learn ethical thinking as children—or they do not. These same participants were quite emphatic that their company only hires ethical people. Given these beliefs and attitudes it seems all the more important to be reminded that organizational contexts can inadvertently create and support social norms that unwittingly encourage unethical decision-making and wrongdoing.

Phil Zimbardo (2008) describes uncharacteristic amoral behavioral shifts as a psychological

transformation of human character that enables ordinary people to engage in unethical decisions and acts. Because we're all vulnerable to the conscious or unconscious demands of our social milieu, this work elevates the urgency for people to learn how to pay attention to the ethical considerations of their daily decisions. Such habits can impact the long term success—or failure—of people and their organizations. As such, perhaps in-house ethics officials and educators can begin to think about ways to help employees integrate ethics into their workplace routines by encouraging the practice of reflection and dialogue in their everyday activities. The best practices outlined in this work provide ideas for how to commence this type of approach.

Finally, the message of ethics as a habit of choice, a capability that needs to be exercised to be sustained, must be constant. Communication from leadership and evaluation mechanisms must reinforce the critical nature of ethical performance. With a focus on both content and context, organizational ethics education and training can help employees at every level experience “ethics” as a core element of personal and organizational success.

Appendix

Table 3. Best Practices: Descriptive Statistics by Items (N=9)*

Best Practices by Category, Theme, and Item	Best Practice Presence (Mean 0-1)	Best Practice Value (Mean 1-7)	Combined Contribution (Mean 1-7)	Companies that Desire Adoption (1- 9)
<u>CONTENT (n=40)</u>				
<u>1. SITUATIONS AND SCENARIOS (3)</u>				
Uses ethical challenges or cases actually faced in the organization as the focus of the training.	0.89	6.00	5.34	1.00
Solicits employees to submit areas of concern, key issues, stories, or ideas to use in training.	0.44	5.25	2.31	2.00
Company solicits employees before or during the training to offer personal cases.	0.25	5.00	1.25	2.00
Theme Cumulative	0.53	5.42	2.85	1.67
<u>2. SPECIFIC AND EXPLICIT BEHAVIORS (5)</u>				
Designed to prevent unethical and illegal behavior.	0.89	6.63	5.90	0.00
Designed to promote values and positive ethical behavior.	1.00	6.56	6.56	0.00
Defines what it means to be ethical and how to apply ethics into everyday activities.	0.89	5.88	5.23	1.00
Describes exact level of accountability ascribed to each employee, explicitly identifying expected behaviors.	0.44	5.43	2.39	1.00
Employees learn how to openly discuss the implications of their actions, practicing transparency and openness as part of workplace routines.	0.25	6.00	1.50	4.00
Theme Cumulative	0.69	6.10	4.23	1.20
<u>3. ONGOING REFLECTION, PRACTICE, AND DIALOGUE (5)</u>				
Includes periods of reflection and sharing ideas during session.	0.28	5.20	5.20	3.00

<u>3. ONGOING REFLECTION, PRACTICE, AND DIALOGUE (Continued)</u>				
Helps employees to use critical thinking or an ethical decision-making process to determine moral action.	0.69	5.43	5.43	2.00
Has employees practice ethical decision-making, posing questions to help them resolve their ethical challenges.	0.22	4.75	4.75	5.00
Has employees practice with ethical scenarios that involve choosing between two right paths.	0.36	5.00	5.00	5.00
Uses role-playing or other techniques to encourage emotional awareness.	0.03	3.00	3.00	5.00
Theme Cumulative	0.32	4.68	1.48	4.00
<u>4. CORE ISSUES (6)</u>				
Addresses compliance issues such as rules, regulations, and laws that apply to employees and their jobs.	0.92	6.56	6.56	0.00
Addresses values and ethics topics that go beyond compliance.	0.92	6.67	6.67	0.00
Addresses how to achieve performance goals ethically.	0.17	5.33	5.33	5.00
Covers key areas, selected because ethical problems often occur in these areas.	0.92	6.22	6.22	0.00
Covers confidential reporting channels (e.g., anonymous telephone line).	0.92	6.67	6.67	0.00
Explains that whistleblowers are protected from retaliation.	1.00	6.78	6.78	0.00
Theme Cumulative	0.81	6.37	5.15	0.83
<u>5. TARGET AUDIENCE (11)</u>				
All employees receive core program that explains the company's ethics philosophy and underscores how rules are consistent/equal at all levels.	0.92	6.89	6.89	0.00
Varies by level, function, and role: Special focus for new employees.	0.89	6.50	6.50	1.00
Provides ethics training during the first month of new employee orientation.	0.81	6.25	6.25	1.00
Varies by level, function, and role: Special focus for first-level supervisors.	0.31	6.20	6.20	1.00

5. TARGET AUDIENCE (Continued)				
Varies by level, function, and role: Special focus for mid-level managers.	0.19	6.00	6.00	2.00
Varies by level, function, and role: Special focus for senior executives.	0.17	6.67	6.67	5.00
Varies by level, function, and role: Special focus for Board of Directors.	0.03	7.00	7.00	4.00
Every employee participates in ethics education and training annually.	0.44	6.50	6.50	2.00
Certain employees, in areas of ethical risk, receive more frequent ethics education and training.	0.78	6.57	6.57	0.00
Mixes hourly and management personnel in sessions.	0.44	5.29	5.29	2.00
Has an ethics education and training for vendors, suppliers, and business partners.	0.19	5.25	0.00	0.00
Theme Cumulative	0.47	6.28	2.95	1.64
6. DELIVERY FORM (6)				
Uses online training for compliance topics.	0.78	6.86	6.86	1.00
Uses online training for values and ethics topics beyond compliance.	0.69	6.86	6.86	0.00
Uses face-to-face training for compliance topics.	0.36	5.86	5.86	1.00
Uses face-to-face training for values and ethics topics beyond compliance.	0.36	5.86	5.86	1.00
Conducted in-house by line management.	0.14	6.00	6.00	3.00
Conducted by the supervisor of each work group for his or her employees.	0.14	6.50	6.50	3.00
Theme Cumulative	0.41	6.32	2.60	1.50
7. LEARNING STYLES (4)				
Uses a variety of tools to address various learning styles.	0.47	5.80	5.80	3.00
Demonstrates how to use the resources (helpline, websites) to report allegations.	0.89	5.44	5.44	1.00
Uses games or other techniques designed to encourage employees to have fun.	0.33	5.67	5.67	5.00

7. <u>LEARNING STYLES (Continued)</u>				
Makes use of videos or acted out situations which demonstrate appropriate ethical behavior.	0.39	6.00	6.00	0.00
Theme Cumulative	0.52	5.73	2.98	2.25
<u>CONTEXT (n=25)</u>				
8. <u>RAISING QUESTIONS AND PROMOTING AWARENESS (9)</u>				
Provides an anonymous telephone hotline where employees can ask questions, get advice, and report concerns.	0.78	6.71	6.71	0.00
Provides an ethics email service where employees can ask questions, get advice, and report concerns.	0.67	6.67	6.67	1.00
Tracks information provided by reporting mechanisms.	0.89	6.00	6.00	0.00
Appoints ethics officers within business units or in each location.	0.42	6.17	6.17	0.00
Ethics information is posted where employees will encounter it daily.	0.22	6.50	6.50	2.00
Ethics information, including the code of conduct, and is provided in written form to all employees.	0.81	6.63	6.63	0.00
Ethics information is available in multiple languages.	0.78	6.29	6.29	1.00
Maintains online website with frequently asked ethics Q&A.	0.78	5.71	5.71	2.00
Employees are solicited for suggested changes in the organization's code of ethics and other ethics information.	0.22	6.00	6.00	2.00
Theme Cumulative	0.62	6.30	3.90	0.89
9. <u>COMMITMENT TO THE CODE (3)</u>				
Code is signed by all employees.	0.81	6.13	6.13	0.00
Employees are asked to re-sign the code each year.	0.28	5.50	5.50	0.00
Distributes ethics codes to vendors, suppliers, and business partners.	0.42	5.67	5.67	1.00
Theme Cumulative	0.50	5.77	2.90	0.33
10. <u>ONGOING COMMUNICATIONS (4)</u>				
Sends special ethics communications to all employees at least once a month.	0.14	6.00	6.00	4.00

10. ONGOING COMMUNICATIONS (Continued)				
Includes ethics content in internal publications to all employees at least once a month.	0.11	6.00	6.00	6.00
Requires line managers to include ethical topics in staff meetings at least once quarterly.	0.06	6.00	6.00	5.00
Requires event planners to include ethics content in company-wide conferences and other events.	0.06	7.00	7.00	2.00
Theme Cumulative	0.09	6.25	0.58	4.25
11. LINKS TO PERFORMANCE (3)				
Recruiting practices evaluate the ethical character of candidates.	0.22	6.50	6.50	4.00
Ethical actions are explicitly included in employees' performance evaluations.	0.31	4.67	4.67	2.00
Managers develop skill sets and competencies to attain successful ethical performance.	0.31	5.80	5.80	4.00
Theme Cumulative	0.28	5.66	1.58	3.33
12. ETHICAL RISK ASSESSMENT (2)				
Conducts formal risk assessment to identify areas of ethical risk.	0.44	6.00	6.00	2.00
Line managers have specific responsibility for managing areas of ethical risk.	0.06	6.00	6.00	5.00
Theme Cumulative	0.25	6.00	1.50	3.50
13. PROGRAM EFFECTIVENESS (4)				
Requires all education and training participants to complete program evaluations.	0.25	5.33	5.33	3.00
Poses questions before and after an education and training session to measure impact on ethical thinking.	0.00	0.00	0.00	3.00
Conducts annual employee surveys to measure ethical attitudes and culture.	0.44	6.25	6.25	4.00
Employee exit interviews include questions about ethical behavior observed.	0.11	7.00	7.00	6.00
Theme Cumulative	0.20	4.65	0.93	4.00

**ACTIONS OF THE BOARD (4)				
Board of Directors explicitly focuses on issues of compliance.	1.00	6.11	6.11	0.00
Board of Directors explicitly focuses on issues beyond compliance.	0.61	5.71	5.71	1.00
Board of Directors performance evaluation is linked to ethics.	0.14	6.00	6.00	2.00
Board of Directors encourages transparency.	0.33	6.50	6.50	0.00
Theme Cumulative	0.52	6.08	3.16	0.75

*Content items=40, Context items=25; Presence is based upon 0=no, 1=yes, or .25=limited; Value (importance) is based upon a 1–7 Likert scale (1=not at all to 7=extremely); Combined Contribution is the product of Presence (mean) × Importance (mean); Desired Adoption represents the number of companies who do not have a given best practice, but would like to adopt. NOTE: A “0” value indicates that this best practice is not being used by any of the participants. ***Actions of the Board* was not a best practice theme identified in Phase One, but was added to the Context category by participant request.

References

- American Productivity and Quality Center. 1993. *The benchmarking management guide*. Portland, OR: Productivity Press.
- Piper, T. R., Gentile, M. C., & Parks, S. D. 1993. *Can ethics be taught?* Cambridge, MA: Harvard University Press.
- Sekerka, L. E. 2008. *Are managers curious about ethics? A process to prepare managers for moral agency*. Paper presented at the *Western Academy of Management Annual Meeting*, Oakland, CA.
- Strauss, A., & Corbin, J. 1990. *Basics of qualitative research: Grounded theory procedures and techniques*. Newbury Park, CA: Sage.
- Ungan, M. 2004. Factors affecting the adoption of manufacturing best practices. *Benchmarking: An International Journal*, 11(5), 504-520.
- Zimbardo, P. 2007. *The Lucifer effect: Understanding how good people turn evil*. New York: Random House.

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