

Code of Ethics Toolkit

*A Guide To Developing
Your
Organization's*

**Code of
Ethics**

©2001 Ethics Resource Center

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise, without prior written permission from the Ethics Resource Center. This toolkit is for SHRM members only and is not to be copied or distributed to anyone other than a SHRM member. Printed in the United States.

Used with permission

Table of Contents

A Message from the CEO iii

I. Introduction 1

II. What is a Code of Ethics and What is its Role? 2

III. How Should a Code of Ethics be Written? 3

Code Format
Guidelines for Writing an Ethics Code

IV. What is in a Code of Ethics? 4

Code Content
Title
Leadership Letter
Table of Contents
Introduction/Prologue
Statement of Values
Code Provisions
Information and Resources

V. How are Codes of Ethics Developed? 8

Planning
Data Intake
Code Drafting
Communications and Education Strategies
Code Revisions
SHRM Code of Ethics Checklist

VI. Sample Forms and Tools for Code Development 13

Writing A Code Provision-A Template
Sample Code Provision

Using an Informal Survey to Gather Information
Sample Survey Questions

Using Interviews and Focus Groups to Gather Information
Sample Interview and Focus Group Questions

VII. Where to Get Additional Help 18

Dear SHRM Members . . .

As you are probably aware, the Society for Human Resource Management has committed to making ethics a priority in our organization and for our profession. As part of an overall ethics initiative, we have recently developed a new SHRM Code of Ethical and Professional Standards in Human Resource Management.

The code was written entirely by a task force committee of SHRM members and leaders with the assistance of the Ethics Resource Center (ERC), a non-profit, nonpartisan educational organization with an Advisory Services division, which offers business ethics consulting expertise. Hundreds of members and leaders were interviewed in focus groups conducted around the country and with a cross-section of our membership.

SHRM members may choose to use this guide to create a Code of Ethics for their own organizations. *The Code of Ethics Toolkit: A Guide to Developing a Code of Ethics* (Code of Ethics Toolkit) has two purposes:

- 1) It outlines the process by which the SHRM member code was developed.
- 2) It can serve as a guide in designing a Code of Ethics for organizations in which you work.

This toolkit, plus the additional information provided on the SHRM website and the offer of additional expert assistance when requested are all part of a coordinated effort to serve the needs of our members and strengthen the bonds and mission that we all share.

Thank you.

Helen Drinan, SPHR
President & CEO
Society for Human Resource Management

I

Introduction

A code of ethics can make a difference in your organization. Beyond clarifying gray areas and providing guidance on everything from the simplest of questions to the most complex ethical dilemma, a code can help your organization to:

- Build trust internally and externally;
- Increase awareness of key ethical issues;
- Stimulate and legitimize ethical dialogue;
- Build consensus around vital issues;
- Guide decision-making;
- Encourage staff to seek advice;
- Foster the reporting of misconduct and related concerns; and
- Clarify where employees should go to seek advice.

A code of ethics offers an invaluable opportunity for a responsible organization to further its positive public identity. This can lead to a more supportive environment and an increased level of public confidence and trust among important stakeholders.¹

Together these benefits can make a profound and positive impact on the culture of your organization. They combine to provide a persuasive rationale for creating a code of ethics should you choose to do that.

¹ *Principles of Stakeholder Management, The Clarkson Centre for Business Ethics, 1999, p. 12.*

II

What is a Code of Ethics and What is its Role?

A code of ethics (code) serves as a central guide to support day-to-day decision making at work. It clarifies the cornerstones of your organization-- its mission, values and principles – helping your staff understand how these cornerstones translate into everyday decisions, behaviors and actions. While some may believe codes are designed to limit one’s actions, the best codes are actually structured to liberate and empower people to make more effective decisions with greater confidence.

An effective code has many uses, but two critical ones stand out. A code should (1) clarify gray areas or questions employees have concerning organizational values and expectations and (2) help build trust and commitment.

At best, a code “reflects the covenant that [your] organization has made to uphold its most important values, dealing with such matters as its commitment to employees, its standards for doing business and its relationship with the community.”²

A code also serves as a key reference tool. Use it to locate key documents, support services and other resources related to ethics and values within your organization.

For all that a code is, it is *not* meant to stand alone. It cannot address all of an organization’s ethics needs, nor can it answer every ethical question or issue that may arise. Rather, view your code as one key element in a broader effort to make ethics a priority at your organization-- a critical bridge for helping to put your ethical principals into practice.

Codes are Designed to . . .

1. Raise ethical expectations (aspirational provisions)
2. Legitimize dialogue about ethical issues (communication provisions)
3. Encourage ethical decision-making (judgment provisions)
4. Prevent misconduct provide a basis for enforcement (accountability and enforcement provisions)

² Driscoll, Dawn-Marie and W. Michael Hoffman, *Ethics Matters: How to Implement Values-Driven Management*, 2000, p. 77.

III

How Should a Code of Ethics be Written?

Code Format

Everything about your code – its tone, style, organization and presentation -- will impact the success of its integration and the extent of its use. Craft your code so that employees will readily understand it and find it a useful reference tool.

Because codes are read by people at different levels of responsibility and in a wide range of functional areas, the code should be written in plain, every-day language.

There are different ways to structure an effective code. Some are very brief and provide little more than the core values or principles of an organization. Others are extremely detailed and lengthy -- offering every rule of conduct an organization can think of.

Guidelines for Writing an Ethics Code

- ☞☞ Be clear about the objectives that the code is intended to accomplish.
- ☞☞ Get support and ideas for the code from all levels of the organization.
- ☞☞ Be aware of the latest developments in the laws and regulations that affect your industry.
- ☞☞ Write as simply and clearly as possible. Avoid legal jargon and empty generalizations.
- ☞☞ Respond to real-life questions and situations.
- ☞☞ Provide resources for further information and guidance.
- ☞☞ In all its forms, make it user-friendly because ultimately a code fails if it is not used.

IV

What is in a Code of Ethics? Code Content

We recommend a middle ground approach to structuring your code of ethics so that it is neither too brief, nor too lengthy and legalistic. A modern “best practices” code would include the following elements:

- Memorable title
- Leadership letter
- Table of contents
- Introduction-prologue
- Core values
- Code provisions-substantive matters
- Information and resources

Memorable Title

The title should communicate the content clearly and at the same time be memorable enough to grab the attention of its readers. Be creative. We suggest that you put some thought into what you will call your document and the message it conveys. Move beyond generic titles such as *Code of Business Practices*, *Code of Ethics*, *Code of Values*, or *Compliance Code*.

We recommend developing a thematic title for your code. Some examples include SHRM’s own *Code of Ethical and Professional Standards in Human Resource Management*, Pricewaterhouse Cooper’s *The Way We Do Business* and the World Bank Group’s *Living Our Values*.

Use the title of your code to inspire ethical behavior.

Leadership Letter

The leadership letter provides a frame for the document and demonstrates your organization’s commitment -- from the top – toward the creation of an ethical culture. It should explain how a code can be used by the employees and outline the reasons for its focus. Address how the code came to be and the process behind its development. Reflect the input and questions from your leaders and volunteers regarding your organization’s values and the direction of the code.

Some typical content areas for the leadership letter may include:

- Why does your organization need a code? Why now?
- What is the ethical/legal context in which your organization operates?
- What are some of the challenges that your employees face, and how can this code of ethics be a helpful document for everyone at all levels?

- What are the major trends facing your organization that will impact and affect the code and its implementation?
- What kind of example might this code set for others?

You need not address all of the items above – just those that seem most critical to your leadership and your culture. Ideally, the leadership letter should be brief and to the point. (The Introduction will provide another opportunity to address some of the above issues.)

Like the code’s title, this is your leadership’s chance to inspire.

Table of Contents

We strongly recommend including a table of contents at the beginning of the code. It may sound simple and even obvious, but many codes overlook this step. Codes often have a tendency to become cumbersome, making it difficult for users to find the provisions they seek. A table of contents can give employees a quick overview of key code provisions and resources, thereby making the document as a whole more accessible and readable.

Introduction-Prologue

An introduction can be used to expand upon some issues not fully addressed in the leadership letter. Ideally, it should provide an expanded explanation for the code and its purpose. You may want to answer the following key questions by way of formulating your introduction:

1. Why is this code important? Will it be enforced? Is it mandatory? Does it apply to everyone?

2. What is the purpose of the code?

Be clear about the purpose and objectives that the code is intended to accomplish.

Is the purpose of the code to inspire employees to exhort them to high principles of conduct? (aspirational document)

Is its purpose more regulatory in nature? Will it spell out prohibited conduct? Affirmative duties? (regulatory document)

Is it meant to provide guidelines for decision-making in areas of managerial/officer discretion?

Is the code’s purpose to capture the spirit or ethos of the organization? Does it attempt to define and protect its culture?

3. What is the scope of the code?

- *Jurisdiction:* To whom does this code apply? What does it address?
- *Definition:* What aspects of organizational activity and impact are to be included in the code?

- *Measurement and Verification:* How should organizational performance in these areas be measured, and how should the accuracy of this information be verified?
- *Accountability and Reporting:* To whom should the organization be accountable for its performance, and how should this information be made public?

Statement of Values – Core Values

Fundamental to an effective code, your organization needs to identify and express its values and those values need to feature prominently in the code – not simply as a list. The code should explain what those values mean and reinforce their importance in the context of the organization and the work it does. In essence, employees need clear definitions of organizational values to better understand and apply them. When possible, tie the values to individual code provisions. For example, if diversity is one of your organization’s key values, it could be tied to a provision outlining the anti-harassment policy.

Code Provisions

As we’ve discussed, codes can be brief or comprehensive depending on the objective. They address a wide variety of issues, ranging from legal and regulatory concerns to relations with the organization’s staff and the application of the organization’s values.

The choice of topics to be included in your code will be influenced by three factors: 1) its purposes and objectives; 2) your organization’s environment; and 3) the questions or concerns expressed by your intended users – your employees. In deciding which topics to address, you might ask:

- What are the principal laws and regulations applicable to our organization?
- What has gone wrong in the past?
- What else could go wrong?
- What guidance do we need to offer our employees?
- Where are there gray areas? What do we need to clarify or confirm?

We recommend an easy, clear structure to maximize the code’s readability and usability. Consider writing your code so that it outlines what you are trying to accomplish (intent), followed by the core principle (an idea which capsulates the underlying idea (or value) behind the principle), guidelines and rules, along with some examples. {See Section VI-How to Write a Code Provision-A Template and a Sample Code Provision}

Information and Resources

This section is critical. It will direct your employees to other resources (internal to the organization and externally) should they have a question, need to seek further clarification or simply want more information on the code provisions. It should include specific statements such as how to access the organization's ethics office (or person responsible for ethical issues) and provide details on your enforcement policy and mechanisms.

Ready reference lists, toll-free telephone numbers, e-mail and web sites and the like would typically be included.

V •

How are Codes of Ethics Developed?

Before you begin the code development process ask yourself the following questions:

- Why do we need a code of ethics?
- How do we develop a code of ethics?
- Who do we include in the process?
- What is the overall cost of the initiative?
- What is the time commitment?
- What is success?

Code of Ethics Development Process: A Model 12 Step Process

PLANNING

Code Development: 12 Steps

1. Decide on goals and meaning of success
2. Get leadership buy-In
3. Create a code development Task Force
4. Data intake and analysis-interviews and focus groups
5. Keep leadership informed
6. Draft your code of ethics
7. Submit code to leadership for review
8. Field test the code and make any final revisions
9. Have the code reviewed by your Legal Counsel
10. Obtain Board approval of final draft
11. Decide on a Communications and Education Strategy
12. Revise and update regularly

1. *Decide on Goals and Meaning of Success* As soon as possible, decide on the goals and the meaning of success for your ethics program. As suggested earlier, a code is typically not effective as a stand-alone document. The benefits of a code result from its strategic use as a part of your organization's broader ethics initiatives. Develop your code based on a specific set of goals that go beyond the code itself. The content of the code, the examples presented and so forth, should allow employees to use the code in addressing their own ethics concerns and furthering the ethics goals of your organization.

2. *Get Leadership Buy-In* The support and commitment of leaders is necessary for success in developing a code of ethics. Resource allocation, the buy-in of others and communications relating to code development are among the critical areas affected by leadership commitment. For these reasons, it is important to gain leadership commitment early in the process and to make this commitment clear to everyone in your organization.

3. Create a code development task force Create a task force or committee and assign them responsibility and accountability for the code development. Give careful thought to selecting appropriate task force employees. Make sure that these employees are committed and have the time to devote to the task force. In choosing team employees, it is often good practice to select people who represent the diversity of your organization and the views of key employees, volunteers and other groups.

DATA INTAKE

4. Data Intake and Analysis-Interviews and Focus Groups Gather information from stakeholders (leadership, employees, volunteers, etc.) on key ethics concerns. For a code to be effective, individuals must find it relevant. Leaders should not necessarily assume that they already know what issues are important to employees. Information gathering through interviews, focus groups and informal discussions can be important ways to surface key issues and can set the stage for an ongoing dialogue about ethics. {See Section VI for How to Conduct a Survey and for information on conducting interviews and focus groups.} In addition, the information gathering process sends a message that your organization believes that ethics issues are important and that the views of employees are valuable. *Analysis.* Next, analyze the information that you have collected from employees. What are the key ethics issues and concerns within your organization? What suggestions do your employees have for creating a more useful code? Use this information to help you in developing an outline and content for your code.
5. Keep Leadership Informed Finally, report your findings to leadership so that they understand how employees, volunteers and other key stakeholders view the current environment. In reporting your findings, limit your comments to items raised by multiple sources and do not indicate where or from whom specific comments or insights were obtained.

CODE DRAFTING

6. Draft your Code of Ethics Seek multiple perspectives in developing a code. In particular, organizations should involve people who are interested or will be affected by the code provisions in the drafting process. Some organizations include stakeholders as employees of their formal committees, whereas others solicit input and feedback less formally. Ideally, the involvement of others can improve the breadth and depth of issues addressed in a code and can also facilitate general support and buy-in. The Task Force – with input from key leadership – will need to decide on the code values, provisions, structure and so forth. Draft a code of ethics that is tailored to your organization and intended to serve its unique needs. Make good use of the information from employees, volunteers and other key stakeholders gathered during your intake process.
7. Submit Code to Leadership for Review Ensure the support of leadership by presenting them with the final draft of the ethics code for review and comment. This step allows leaders to maintain a participative role in the code development process, even if they have

not been actively involved in the day-to-day drafting of the code. Such participation tends to reinforce leadership commitment to the overall code initiative. *Revise Code as Appropriate*. Appropriate comments and suggestions should be included into your revised draft code. The inclusion of these comments and suggestions should not only strengthen your code, it can also build ownership of the code among those who provide feedback.

8. *Field Test the Code and Make any Final Revisions* Take the revised code “out into the field” again for any final suggestions and revisions. There are always details that will be missed in the early drafts. Once the code is nearly final, it is often easier for individuals to bring these to your attention. Make any final necessary revisions.
9. *Have the Code reviewed by your Legal Counsel* Once you have a document that you are comfortable with take it to your legal counsel for review.
10. *Obtain Board Approval of Final Draft* Before publishing and disseminating the final code, have it formally approved by your Board of Directors.

COMMUNICATIONS AND EDUCATION STRATEGIES

11. *Decide on a Communications and Education Strategy* Design and develop a comprehensive communications and education plan to increase code and program effectiveness. Think carefully about who needs the information and how you can best get it to them in a cost effective manner. As noted previously, a code of ethics is, in many ways, a vehicle for ongoing communications about ethics. The code will have a greater impact to the extent that future ethics communications tie into, build on, or emphasize key issues that are addressed in the code. Communications can take many forms including ethics training, newsletter articles, posters, e-mails, formal and informal discussions of ethics and the like. *Roll Out the Code with a Special Event*. We recommend that the code be launched at an event involving the organization’s leadership and other important contributors to the code. The event should convey the reasons for the development of the code and its importance in the organization’s overall ethics initiative. Consistent with the message in the code, the event should emphasize that the distribution of the code is not an end in itself but rather one key step in an ongoing process.

REVISE AND UPDATE THE CODE

12. *Revise and Update Regularly* Codes of ethics should not be viewed as static documents. While they seek to capture timeless ethical principles, the guidelines, examples and related information they contain should be revisited in light of changes that may occur in an organization’s environment. New issues may arise that were overlooked in previous versions. In addition, periodic revision of the code can send a symbolic message to employees that ethics is an area that requires ongoing attention. An organization that does not revisit ethics issues in its code may unintentionally send just the opposite message.

Code of Ethics Checklist

1. Have we decided on the goals and meaning of success for our ethics program/code development?
 - Have specific goals been articulated?
 - Have we had a meeting where people could share their vision of success?
 - How will we evaluate whether our goals have been reached?
2. Do we have the support of our leadership?
 - Has leadership agreed to the basic benefits and rationale for the program?
 - Will they devote resources to getting this done and done right?
 - Will they talk publicly about the code development process and program?
 - Will they rally support for the program?
3. Have we created a code development/ task force/committee?
 - Who should be on the task force? Is it representative?
 - How often should they meet?
4. Have we completed our data intake and analysis?
 - What information do we need?
 - From whom can we get it?
 - Who is gathering the information? Us? An external group?
 - What is the best method of getting the information (interviews? focus groups? survey?)?
 - Have we analyzed the information?
 - How should we analyze the information?
 - How will we communicate the information/results to the task force?
 - Do we want a written report? An oral briefing?
5. Have we kept our leadership informed and part of the process?
 - Who needs to be kept in the loop?
 - Should we call a special meeting to convey our findings?
6. Have we drafted the code of ethics?
 - What is our code drafting process?
 - What is our timeframe for drafting the code?
 - Who's doing the actual writing?
 - Have we involved key stakeholders in drafting the code?
 - Who are our key stakeholders who should be involved in drafting the code?
 - How will we involve these stakeholders?
7. Have we gotten leadership approval of the draft code and revised according to input?
 - Who needs to sign off on the final draft?
 - Did we revise/redraft the code based on input?
 - Have any final edits been done?
 - Have we carefully considered the code draft input from leadership and others and made appropriate edits?
8. Did we field test the code and make any final revisions?
 - Who will review the redraft?
 - What specific input are we looking for or do we expect from our select reviewers?
 - What is our process for fielding the redraft? Mail to select stakeholders and ask for written edits, interview people once they have read the code, convene a special meeting?
9. Have we gotten a legal review?
 - Have our attorneys reviewed our code draft?
 - Does the code cover the specific legal issues we need to be concerned about?

10. Have we obtained Board Approval of the final draft?
 - Do we need to call a special meeting of leadership?
 - How will leadership announce their commitment to the program?
11. What will do about communications and education?
 - How will we communicate the goals of the program to our employees as well as customers and the public?
 - Who needs to know about the program?
 - How will we educate our employees, and stakeholders?
 - Have we planned a kick-off event to introduce the code?
 - Will we provide ongoing ethics communications and training?
 - How often do people need to be trained on the code and our ethics program?
 - Will we incorporate ethics training in employees' orientations?
 - Should we divide training into separate components and have training sessions quarterly, yearly?
12. How will we evaluate the program and revise the code/program as necessary?
 - How will we know that our new code and program are making a difference?
 - What measures will tell us that the program is successful?
 - Who will conduct the evaluations? Us? An outside organization?
 - Do we plan on revising the code in the future?
 - How will we make adjustments to the code as the program evolves?

VI

Sample Forms and Tools for Code Development

The following section provides tools you can use for your own code development process. Included below are instructions for writing a code provision, followed by a sample code provision. Information on developing a survey and interview and focus group questions are also provided.

Writing a Code Provision - A Template

These are the basic elements of a best practices code provision. Depending on your goals, there are a variety of styles that can be used in crafting a code provision--from a formal reference as seen in our example code provision or using an informal narrative style. You may choose to group all principles together, followed by values, and so on. You can simplify but try not to omit central ideas or key elements covered.

1. Principle: A basic truth, concept or motivating force that addresses appropriate conduct for an organization and its employees.
2. Statement of Intent: The rationale underlying a principle and why that ethical principle is important to the organization's overall goals and mission.
3. Guidelines/Rules: Criteria for decision making that are specific to the organization. These guidelines and rules may prohibit certain actions and require others.

Guidelines provide a basis for ethical decision making when employees face situations where black-and-white rules are impossible or inappropriate. They may involve especially sensitive issues like conflicts of interest, insider trading, and the offering or acceptance of gifts, gratuities or entertainment.

Rules have a standard setting function. They may draw heavily on existing law as a source or lay down other obligations for an organization.

4. Examples: Examples are definitions, rationales and illustrations that help clarify rules and guidelines.

Sample Code Provision

The following sample code provision is a more formal style. You may choose a simpler style depending on your goals and audience.

USE OF INFORMATION

Core Principle

HR professionals must protect the rights of employees, especially in the acquisition and dissemination of information while ensuring truthful communications and facilitating informed decision-making.

Intent

To build trust among all organization constituents by maximizing the open exchange of information, while eliminating anxieties about inappropriate and/or inaccurate acquisition and sharing of information.

Guidelines

1. Avoid the acquisition and dissemination of information that may not be used in employment related decisions.
2. Investigate the accuracy and source of information before allowing it to be used in employment related decisions.
3. Correct inaccurate HR information promptly.
4. Do not knowingly reveal restricted or confidential information.
5. Insure the accuracy and completeness of all communicated information about policies and practices.
6. Insure the accuracy and completeness of all communicated information used in training.

Example ...

Situation - As a benefits administrator, while processing an FMLA form, you become aware of a senior employee who is incurring huge medical expenses with a serious illness. You work for a small firm and the insurance claims will have a big impact on the company's financial situation. In addition, the employee is responsible for national sales programs and sales are lagging. At the weekly administrative staff meeting the fact that the sales executive is on leave is noted. People start to chuckle and speculate the person is probably golfing with customers. Someone asks in a serious tone, "Does anyone know what's going on?"

Solution - As an HR professional you are bound to protect the confidentiality and privacy of employees. Keep quiet.

Using an Informal Survey to Gather Information

In preparing to write a code (develop content, inform communication strategies etc.), it is often valuable to conduct an informal survey of employees to get their views on key ethics-related topics. The main purpose of such a survey is to give a broad range of people the opportunity to share their views. Their responses can then be used to develop more targeted questions for use in focus groups and interviews to be discussed shortly. Please note that this type of survey is meant to be exploratory. It is *not* intended to provide information for use in detailed and quantitative analysis of what respondents think about an issue.

Surveys are typically distributed either through the mail or, where readily available, by e-mail. The survey should contain a letter, preferably signed by the leader of your organization, explaining the purpose of the survey, its importance and how the information will be used. The letter should assure respondents that their responses will be kept confidential. The survey itself should not contain any marks by which respondents may be identified.

For this type of informal survey, we recommend asking “open-ended” questions, rather than close-ended questions where the possible response categories have been pre-determined (e.g. yes/no or scale questions). Open-ended questions can allow respondents to provide you with richer information than is possible with close-ended questions.

Sample Survey Questions

- How is this organization perceived in the community?
- What values and principles are central to our organization and in our work?
- What are our main strengths and weaknesses as an organization?
- As an organization, how successful are we at *practicing* our values and principles in our work? Can you share an example?
- What are the main ethical issues and principles we should focus on in developing our code of ethics?
- Do you have any other thoughts or ideas that may be helpful in developing a code for this organization?

Using Interviews and Focus Groups to Gather Information

In preparing to write a code of ethics, we also recommend that you conduct a series of interviews and focus groups with employees. When conducted carefully and thoughtfully, both approaches can be effective ways of gathering useful, in-depth information. In the following section, we provide a series of questions that have proven effective in eliciting important feedback from employees on issues of workplace ethics.

We present these questions with the caveat that they should be used only by experienced interviewers and focus group leaders. Organizations that have access to individuals with such experience are encouraged to use them. Due to the potentially sensitive nature of ethics discussions, confidentiality and related issues, we do not suggest that persons without such experience conduct the interviews or focus groups. Below is a brief introduction to these techniques.

Those who lead interviews and focus groups typically ask very similar sets of questions. The main difference between these approaches is that an interviewer usually talks to only one person at a time, whereas a focus group leader typically talks with groups ranging from eight to twelve people. Both interviews and focus group discussions are excellent for exploring issues in-depth. They allow for follow-up questions and more detailed explanations of answers not possible in surveys. Interviews and focus groups may be particularly useful in: surfacing issues that should be covered in a code; getting examples of problematic situations; exploring appropriate language and concepts; developing communications and enforcement approaches and so forth.

Conducting interviews and focus groups can also provide benefits such as:

- Ensuring that your organization's code includes issues of importance and relevance to employees, volunteers, and other key stakeholders.
- Developing broader awareness among employees of your organization's ethics initiative and code in particular;
- Allowing those drafting the code to use language and ideas that will resonate with individuals who are internal and external to your organization.

Be aware that there are many factors that may affect the quality of the information you collect and its usefulness. These include: whom you talk to, for how long, what questions you ask, how you analyze the information received and how you communicate the results.

Sample Interview and Focus Group Questions

Understanding how employees perceive ethics in your organization . . .

- What does ethics *mean* in your everyday work with our organization?
- What values and principles are central to our organization and in our work?
- How effectively does this organization put its values and principles into practice? Where can we use improvement?
- Is leadership committed to high standards of ethical behavior? Can you give an example? Are there particular areas where you would like to see leadership do more?

Identifying central ethical issues and how people approach them . . .

- What are the key ethical issues (e.g. conflicts, pressures) that organization employees face in their work? How do employees typically approach these issues?
- Are organization employees able to openly discuss their ethics issues and concerns?
- Where can employees go for guidance if they have questions or concerns about ethics? How useful are these services? How easy are they to access?

Generating suggestions for developing a code of ethics . . .

- What are the main ethical principles, issues and/or concerns that you feel should be covered in a code of ethics?
- What other content would you suggest in order to make a code more useful and relevant to the employees of this organization?
- To what extent do you feel a code of ethics can be realistically and effectively enforced within this organization?
- Before we conclude, are there any topics we haven't covered that you would like to raise and discuss?

VII

Where to Get Additional Help

Additional support is available through the following resources:

Ethics Resource Center
1747 Pennsylvania Avenue, N.W. Suite 400
Washington, D.C. 20006
Phone: (202) 737-2258
Fax: (202) 737-2227
ethics@ethics.org
<http://www.ethics.org>

Society for Human Resource Management
Information Center (SHRM Members Only)
1800 Duke Street
Alexandria, VA 22314
Phone: (800) 283-7476
Fax: (703) 836-0367
<http://www.shrm.org>

Business for Social Responsibility
609 Mission Street, 2nd Floor
San Francisco, CA 94105
Phone: 415.537.0888
Fax: 415.537.0889
<http://www.bsr.org>

Center for Business Ethics
Adamian Graduate Center, Room 108
Bentley College
Waltham, MA 02452
Phone: 781.891.2981
Fax: 781.891.2988
<http://ecampus.bentley.edu/dept/cbe/>

Ethics Officer Association
30 Church St., Suite 331
Belmont, MA 02478
Phone: 617.484.9400
Fax: 617.484.8330
<http://www.eoa.org>

Institute of Business Ethics
12 Palace Street
London, SW1E 5JA
United Kingdom
Phone: 44.171.931.0495
Fax: 44.171.821.5819
<http://www.ibe.org.uk/assist.htm>

Institute of Global Ethics
11 Main Street
P.O. Box 563
Camden, Maine 04843
Phone: 207.236.6658
Fax: 207.236.4014
<http://www.globalethics.org/corp/default.html>

Josephson Institute of Ethics
4640 Admiralty Way, Suite 1001
Marina del Rey, CA 90292-6610
Phone: 310.306.1868
Fax: 310 827-6247
<http://www.josephsoninstitute.org>