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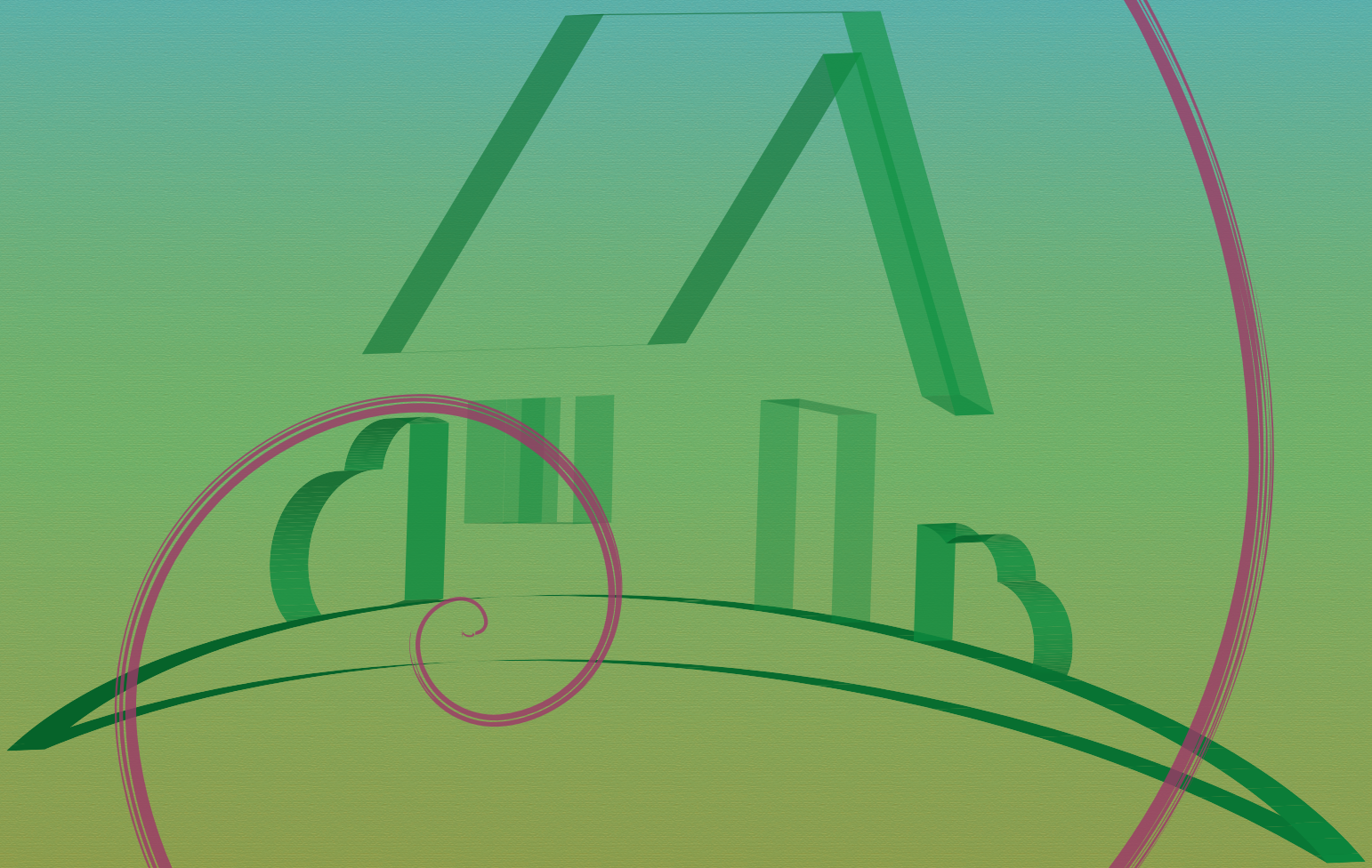
Global ethics and integrity benchmarks

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Download date	2026-11-13 11:22:57
Link to Item	http://hdl.handle.net/20.500.12424/219417

Global Ethics and Integrity Benchmarks

By Joan Elise Dubinsky
and Alan Richter



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Global Ethics and Integrity Benchmarks

Your feedback, suggestions, and stories of how you are using Global Ethics and Integrity Benchmarks are welcome. Please feel free to contact us.
Please send us your contact information if you wish to receive future versions of Global Ethics and Integrity Benchmarks.

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INTRODUCTION

Global Ethics and Integrity Benchmarks is a tool for helping organizations assess and measure their progress in making a formal and transparent commitment to ethics and integrity in the workplace. It enables organizations and their leaders to identify specific actions to enhance performance. Although conditions and attitudes vary greatly worldwide, we have identified these benchmarks as global because of their worldwide and incremental applicability. While making these benchmarks global has certainly been a challenge, we believe they address the need for a universal and systemic approach to workplace ethics and integrity.

We believe that organizations around the world operate in similar fashion when it comes to selecting ethical courses of action. Though legal standards and expectations for businesses differ (though only within a predictable range), the fundamentals of workplace ethics transcend national boundaries and legal systems.

Global values are at the foundation of the Global Ethics and Integrity Benchmarks. Global values, including integrity, can be found in all religions, texts on moral philosophy down through the ages, and in the United Nations Universal Declaration of Human Rights and all resulting rights-related conventions and principles. Though there is significant "play" in how global values (such as integrity) can be defined and their scope of application, there is little doubt that what unites us as human beings is this ethical dimension. Different cultures, nations, and societies may differ about how to prioritize specific moral values. Nevertheless, all human societies accept that a set of global values exists and that these values tend to unite—rather than divide—us.

We have written Global Ethics and Integrity Benchmarks (GEIB) to apply to all types of organizations in all sectors. The benchmarks will be most relevant to large and medium-sized organizations. However, we believe small organizations will also benefit from working with this tool. The benchmarks can be used by for-profit, not-for-profit, government and civil society organizations—wherever individuals care that their workplaces are known for a commitment to ethical action.

Since 2009 when we launched the first edition of the GEIB, we have used this tool with many organizations around the world, have had many requests for its use, and have had thousands of downloads of the document from our website. We have observed that ethics and integrity expectations are rising around the world. Now with much hindsight and experience in using the tool, and with our expanded expert panel (EP list – see pg 15) we have reformulated and expanded the categories into three groups: Foundation, Culture and Risk Management.

This model represents what is needed to build a house for ethics and integrity, in a systemic and sound manner. The four Foundation categories are essential to supporting the structure; the five Ethical Culture categories represent living in the "house"; and the five Ethical Risk Management categories provide the necessary ethical risk protection.

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In using the benchmarks as part of an organizational assessment, one can select from the categories offered – not all need apply, nor need they be weighted equally, and much will depend on the state of maturity and nature of your organization. For example, if you are just starting out with ethics and integrity, then the Foundation categories will be critical.

These benchmarks reflect emerging successful organizational standards and practices. They can and will change over time, evolving as all workplace standards and practices grow and improve. Organizations that do benchmarking may look upon these benchmarks as prescriptive of effectiveness or simply as descriptive of current best practices. We believe the descriptive approach is safest, as context is usually critical in assessing the importance and relevance of the benchmarks. In one context, one might not adopt a best practice while in another context it may be a critically desired factor. From a global perspective, therefore, it is imperative to critically review these benchmarks, and evaluate the relevance and importance of each category to your organization.

The levels. The best practices in each category are shown as 100%. For each category, the benchmarks are divided into five levels that indicate progress toward the best practices in that category – from 0% (where work has yet to begin) to 25% (compliance mindset) to 50% (where significant work has begun to take root) to 75% (robust) and then on to global or world-class best practices at 100%. So, for example, if your organization's practices generally match the 50% level in a category, you can consider your organization to be at the 50% level of the best practice in that category.

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Defining terms. We define ethics and integrity broadly. Ethics and integrity refer to a commitment to moral thought and action in all aspects of how an organization is governed and run. Ethics and integrity describe the "oughts" and "shoulds" of how organizations relate to their stakeholders rather than the "musts." We like to draw distinctions between legal compliance and ethics and integrity. Legal compliance describes the necessary and minimum conditions for following the law and avoiding punishment. Legal compliance focuses on what one has the right to do and by implication what one cannot do by law. By way of contrast, ethics and integrity describe the moral choices that individuals and organizations alike should make. A focus on ethics and integrity supports an organization and its employees when operating in an area where the law is not clear or not yet well-developed.

We believe that healthy, high-performing, and successful organizations must pay close attention to ethics and integrity, above and beyond legal compliance. Sovereign governments set legal standards. Legal standards and compliance expectations may be similar but are rarely identical across national borders. Ethics and integrity expectations for organizations should transcend national boundaries.

By "global," we simply mean that these benchmarks are universally applicable, not specific to a country or culture. However, cultural and country differences may deeply impact which categories you select and how these benchmarks are prioritized.

Conceptual frameworks. There are competing conceptual frameworks for understanding and categorizing global ethics and integrity work. Some of the prominent schools of thought include: 1) stakeholder rights, duties, and obligations; 2) substantive and procedural due process; 3) corporate social responsibility and the purpose of the firm; and 4) social contract theory. Our benchmarks include aspects of all of these sometimes competing frameworks.

Background on the source and development. We are indebted originally to the diversity field. Bench Marks for Diversity was first published by the Tennessee Valley Authority (TVA) in the early 1990s based on groundbreaking research. Julie O'Mara and Alan Richter then updated, reconfigured and made universal the original tool to create the Global Diversity and Inclusion Benchmarks (2006, 2011, 2014). The idea behind this current tool was to use the structure of the tool for Global Diversity and Inclusion and rework it for Global Ethics and Integrity. This is now the second, updated version of the GEIB.

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The authors. Both of us reside in the United States and are aware of the cultural consequences of our location and background in compiling these global benchmarks. Alan grew up in South Africa, lived in the United Kingdom, and has been doing ethics and diversity consulting around the world. Joan grew up in the Midwest of the United States, has lived in several U.S. cities, has traveled and consulted in several countries, served as the Ethics Officer for the International Monetary Fund, is currently the Director, Ethics Office of the United Nations, and is one of the leading business ethics practitioners in the U.S. and among international organizations operating globally.

The panel of experts. To ensure quality work and augment and validate our global view, we have called on expert panelists (EP) who reside and/or work globally. We expanded our EP in 2014. They are listed and acknowledged for their invaluable contributions on page 15.

We hope that this Global Ethics and Integrity Benchmarks tool will be a useful one in helping organizations assess themselves objectively. We encourage organizations to aspire to be the best place to work from a perspective of ethics and integrity. Ethical organizations recruit and retain ethical employees and work and partner with ethical suppliers, vendors, and other stakeholders. We believe that a fundamental commitment to ethics and integrity in organizational practices is key to making this a better world in which to live and work, one organization at a time.

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January, 2015

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HOW TO USE THIS TOOL

Here are some ways to use these benchmarks:

- To set and stretch organizational standards. Standards are helpful for employees, managers, executives, and board members because they help define excellence. Use the benchmarks to set standards for achieving ethics and integrity in your organization as part of a strategy and planning process.
- To educate senior leaders and governance authorities on expectations, goals, and structures for effective ethics and integrity programs within an organization.
- To engage employees and promote accountability for progress. Obtain buy-in from management and the Board. A top-down approach is likely to be more successful in achieving excellent ethics and integrity standards. Have groups discuss selected categories and try to reach consensus on the level at which their departments or organizations currently compare to the benchmarks. If no consensus can be reached, then discover what is the narrowest agreed-upon range. Doing this repeatedly with different groups in an organization provides some objective measure of agreement. Tracked over time, this iterative process can chronicle your organization's progress in the chosen categories. Report back to management and the Board regularly.
- To determine and evaluate organizational progress towards short-term and long-term program goals. Use your organization's benchmark scores to determine which of the categories are most important or strategic, and then set goals for achieving some of the benchmarks and work toward increasing the percentage/score.
- To engage in continuous improvement of your organization's ethics and integrity systems and processes. This set of global benchmarks is one tool — but not the only one of its kind — that can be used to conduct rigorous self-assessments resulting in concrete goals for program improvement.
- To assess ethical risk. The model launched in this version has greatly expanded on ethical risk management. These benchmarks can help organizations identify, describe and assess a wide range of ethical and reputational risks.

How NOT to Use These Benchmarks

These benchmarks have been created based on our experiences and the experiences of the expert panel. While we are confident that the benchmarks represent realistic and successful practices, they are not based on a systematic empirical study. Therefore, please use these benchmarks as guidelines, not as requirements. They should not be used to determine whether an organization has met specific legal standards set by any one national jurisdiction. Do not use them to make compensation decisions or to judge the effectiveness of individuals who have organizational responsibility for implementing ethics and integrity programs. The benchmarks are not the same as legal advice, and do not replace consultation with your organization's legal counsel. We are not legally responsible for any misuse of these benchmarks.

Furthermore, these benchmarks are not designed to do organization-to-organization comparisons. This tool is not designed to create a sector scoreboard. Instead it is solely designed for any organization to benchmark against global best practices and chart development over time.

If you have questions about the use of this tool, please contact us.

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CATEGORY DESCRIPTIONS

Foundation

1. **Vision and Goals.** Covers the organization's overall approach to ethics and integrity, including its formal articulation of the organization's underlying commitment to ethical and moral conduct, and how these aspirations and expectations are embedded throughout the organization. This category includes how an organization identifies and defines its core ethical values or principles, as well as how it integrates those values into everyday business conduct.
2. **Leadership.** Covers the responsibilities of the organization's leadership in shaping, guiding, and supporting the organization's ethics and integrity initiatives. It examines how board members, leaders and managers show commitment, lead by example, and are held accountable for promoting ethics and integrity throughout the organization. This category includes an assessment of "Tone from the Top".
3. **Ethics Resources.** Covers how the ethics function is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category includes the qualifications, roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.
4. **Legal Compliance, Policies, and Rules.** Addresses how core laws, policies, rules, and guidance create the legal framework within which ethical behavior will flourish. It includes compliance with the external legal framework, established by the multiple jurisdictions within which the organization operates. This category covers the systems and controls used to ensure that the organization, the Board and all employees are legally compliant.

Ethical Culture

5. **Organizational Culture.** Addresses how the organization promotes ethical conduct in the context of its mission, vision, structure, and strategy. This category explores the degree to which an organization focuses on shaping its organizational culture (both the written and unwritten rules that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. This category addresses how culture promotes trust, respect and goodwill among individuals.
6. **Disciplinary and Reward Measures.** Describes how the organization sets and enforces its standards for ethical conduct and behavior. This category addresses rewards and punishments, incentives that promote ethical behavior, and disciplinary action taken to deter or punish unethical conduct. This category includes how the organization promotes ethical conduct through its performance appraisal process, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.

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7. Corporate Social Responsibility. Examines the foundational principles of the organization. This category covers the organization's efforts to establish links with and invest in the communities and stakeholders with which it interacts. This category covers government relations, environmental consciousness, philanthropy, sustainability, and community impact.
8. Ethics Communication. Describes how the ethics and integrity strategy is articulated and promoted, both internally and externally. This category covers how the organization defines its stakeholders and how it crafts key messages for distinct audiences. This category considers both opportunities and ethical risks arising from the use of social networks and social media.
9. Ethics Training and Education. Explores ethics and integrity awareness, skill-building training, and the integration of such training into the overall development of employees. This category addresses the provision of ethics training throughout the life cycle of employees, and the degree to which these initiatives are integrated into other organization-wide training commitments.

Ethical Risk Management

10. Ethics Risk Assessment. Explores how the organization articulates and assesses ethical and reputational risk. This category describes how risk is defined, measured, and managed to ensure that the ethics and integrity strategy addresses those risks that are the most serious and most likely to occur.
11. Whistleblowing and Investigations. Explores how the organization encourages individuals to make reports about questionable conduct. This category describes the methods and protections offered to individuals who wish to make the organization aware of possible unethical behavior, misconduct, or illegal actions. This category covers how complaints about unethical behavior and misconduct are investigated, ensuring that the principles of due process are observed.
12. Conflicts of Interest. Covers the organization's ability to effectively manage personal conflicts of interest, eliminate favoritism, and eradicate self-dealing. This category considers the systems for recognizing, appreciating, and resolving personal conflicts of interest in the best interests of the organization.
13. Confidentiality and Transparency. Covers the organization's ability to effectively balance its duty to maintain an appropriate level of confidentiality with its obligation to promote transparency in its interactions with stakeholders.
14. Bribery and Corruption. Covers the organization's ability to effectively ensure that fraud, bribery and corruption are eliminated from all aspects of its operations.

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GUIDELINES FOR READING

Each category follows the same format. Each level is described as 0%, 25%, 50%, 75%, or 100%. The 100% level indicates current best practices for each ethics and integrity category as perceived by the authors and in concurrence with the expert panelists. Going beyond the 100% would make your organization a pioneer and probably a model for the next update.

The 0% level typically identifies an organization that has not yet begun to focus on this specific ethics consideration. The 25% through 100% levels then progressively show where an organization might be situated as it improves in that category, finally reaching the 100%, or best-practice, level. The 100% level describes current best practices as of September 2014.

The descriptors combine both processes and outcomes; however, the outcomes become more important the higher the level of the descriptor. The positive outcomes are to be read cumulatively, so that 100% descriptions incorporate the positive outcomes of 25%, 50% and 75%. For example, if at 25% or 50% the descriptor says "some managers," assuming this is a positive outcome, then at 75% and 100% one can assume that "some managers" become "most (if not all) managers." The cumulative effect is strongest in the 75% to 100% range, but less so in the 50% to 75% range or below.

Terminology

To clarify definitions and avoid repeating lengthy terminology, please note the following:

- We refer simply to "ethics," which in many places is shorthand for "global ethics and integrity."
- We use "chief ethics officer" to designate the most senior person responsible for leading all ethics initiatives in an organization. This person has expertise in organizational ethics but may or may not be a full-time ethics professional. We want to distinguish the top executive or leader of the entire organization from the highest-ranking person in the organization with specific programmatic responsibility for ethics. While we believe that the top executive should also have ethics responsibility, we also believe that it is important to have a senior person in the organization with specific knowledge of ethics and integrity as a practical discipline. The titles used for this role will vary around the globe.
- We use the term "leaders" to describe everyone in the organization who has responsibility for accomplishing some or all of the organization's ethics and integrity vision and goals. In some cases these leaders will be board members and senior executives. In other cases, "leaders" will include managers and supervisors and/or individual contributors.

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Foundation

1 : Vision and Goals

Covers the organization's overall approach to ethics and integrity, including its formal articulation of the organization's underlying commitment to ethical and moral conduct, and how these aspirations and expectations are embedded throughout the organization. This category includes how an organization identifies and defines its core ethical values or principles, as well as how it integrates those values into everyday business conduct.

100%

- ☐ Ethical thought and action are part of the fabric of the organization, tied to its vision and mission. Ethics is seen as key to sustained growth and success rather than as an isolated program or initiative.
- ☐ Employees consistently behave in a way that shows their commitment to achieving the organization's vision for ethical action.
- ☐ Each one of the organization's ethics goals is reasonable, purposeful, clear, measurable and achievable.
- ☐ Over 90% of a diverse sampling of employees rate the workplace as just, tolerant, fair, and respectful of individuals and their communities.
- ☐ The organization is publicly acknowledged as a leader and strong promoter of ethics and integrity.

75%

- ☐ The organization has articulated the "social contract" between itself and each employee, specifying their mutual and reciprocal rights, duties, and obligations.
- ☐ In a contest between upholding principles and seeking profit, leaders are clear that upholding ethical values comes before closing a deal, making a sale, or pursuing unbridled profitability.
- ☐ Individuals have standards of performance based upon the organization's core ethical values and both group and individual performance is measured against these standards.
- ☐ Ethical action and ethical leadership are perceived as critical for the organization's continuing success.

50%

- ☐ Ethical conduct is seen as a requirement for organizational and individual performance.
- ☐ The organization has identified and defined its core ethical values, and communicates about its values on a regular basis.
- ☐ The organization and its leaders understand and reinforce the connection between ethical values, performance, organizational purpose, and success.
- ☐ The organization and its leaders recognize that legal conduct and ethical behavior are related but not necessarily identical.

25%

- ☐ "Ethics" is narrowly defined, referring primarily to legal compliance and/or the organization's formal internal rules structure.
- ☐ A legalistic code of conduct and/or compliance policy exists.
- ☐ There may be reference to ethics in the organization's values statement, but little is done practically to embed ethical action in the organization.

0%

- ☐ There is no explicit ethics and integrity vision, goals, policies, statement, or program.
- ☐ Ethics and integrity are not seriously discussed in any business-related fashion.
- ☐ If mentioned, ethics and integrity are dismissed by leaders and managers as not relevant to the organization's purpose.

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Foundation

2 : Leadership

Covers the responsibilities of the organization's leadership in shaping, guiding, and supporting the organization's ethics and integrity initiatives. It examines how board members, leaders and managers show commitment, lead by example, and are held accountable for promoting ethics and integrity throughout the organization . This category includes an assessment of "Tone from the Top".

100%

- ☐ Management and leadership rewards, including pay, bonuses, recognition and promotions, are tied to behavioral indicators measuring commitment to ethics and integrity.
- ☐ Leaders are fully accountable for supporting ethical conduct at both an individual and organizational level.
- ☐ Leaders are seen as role models. They emphasize the importance of ethical conduct as a core organizational value and strategy, and they provide consistent, visible ethical leadership.
- ☐ Leaders and board members publicly support ethics and integrity initiatives, even when these initiatives are perceived to be controversial.

75%

- ☐ Managing ethically is considered an essential leadership competency.
- ☐ Leaders and managers are ethically aware, comfortable with the vocabulary of ethical analysis, and act in ways that are consistent with the organization's values.
- ☐ Leaders are comfortable speaking about ethics and integrity before a variety of groups.
- ☐ The Board shares responsibility for integrating ethical conduct into the organization's culture, and includes ethics on its agenda.
- ☐ Ethical awareness, analysis, and action are routinely incorporated into selection, performance evaluation, and promotion decisions.

50%

- ☐ Leaders view promoting ethical conduct as part of their responsibilities and are held accountable for their own ethical behavior.
- ☐ Leaders hold managers and supervisors personally accountable for integrating ethical conduct into daily operations.
- ☐ Board members and leaders view ethics and integrity as a management level function, with direct impact on the organization's bottom line.
- ☐ Leaders understand that there is a direct connection between "tone from the top" and whether their organization enjoys a positive reputation for ethics.
- ☐ The organization's leadership model incorporates personal ethical behavior as a key indicator of success.

25%

- ☐ Leaders view ethics and integrity as mainly a Human Resources or Compliance function.
- ☐ Leaders need scripts to discuss ethics and integrity.

0%

- ☐ Neither board members, leaders nor managers are involved or held accountable for their organization's reputation for ethics and integrity.
- ☐ Leaders assume that their private moral codes are adequate in leading the organization.

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Foundation

3 : Ethics Resources

Covers how the ethics function is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category includes the qualifications, roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.

100%

- ☐ The ethics function has full operational independence.
- ☐ The chief ethics officer is a recognized and respected member of the senior management team.
- ☐ The chief ethics officer serves as an independent and confidential ethics advisor to board members.
- ☐ The chief ethics officer has a dual reporting relationship to executive management and the Board.
- ☐ The chief ethics officer's remarks are not subject to pre-clearance by any member of management.

75%

- ☐ A senior executive leads the ethics function, supported by a knowledgeable staff of ethics professionals, adequate for the size and goals of the organization.
- ☐ Adequate financial and other tangible resources are allocated to the ethics function, as part of the organization's budget cycle.
- ☐ The chief ethics officer reports regularly to senior management on activities and results of the function.
- ☐ Annual reports about ethics activities and results are made to the Board by the chief executive or a ranking leader.
- ☐ The ethics function publishes an annual report, which is integral to the organization's overall strategic planning.

50%

- ☐ There is a senior-level manager and supporting ethics staff with organization-wide responsibility for ethics and integrity activities.
- ☐ The senior-level ethics manager reports to the top executive, or to another member of the executive management team.
- ☐ A designated budget has been allocated to cover implementation of the ethics agenda.
- ☐ The ethics function is subject to regular audit oversight, either through existing oversight mechanisms such as internal audit, or through an independent, external review mechanism.
- ☐ The ethics function encompasses all locations regardless of geography.

25%

- ☐ Ethics functions are performed as additional, secondary duties by mid-level staff in HR, Compliance or the Legal department.
- ☐ Organizational ethics is not recognized as a unique discipline requiring specialized skills, knowledge, or experience.

0%

- ☐ There is neither an organizational structure focused on organizational ethics nor a designated individual responsible for ethics and integrity.

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Foundation 4 : Legal Compliance, Policies and Rules

Addresses how core laws, policies, rules, and guidance create the legal system within which ethical behavior will flourish. It includes compliance with the external legal framework, established by the multiple jurisdictions within which the organization operates. This category covers the systems and controls used to ensure the organization, the Board and all employees are legally compliant.

100%

- ☐ The organization has clearly articulated the ethical standards and principles expected of everyone, including third parties (e.g., suppliers, vendors, consultants, agents, and contractual workers).
- ☐ Leaders uphold the code, regularly referring to it in speeches and other communications, and refer to and use the code in everyday decision-making.
- ☐ The code and supporting rules and policies are seen as best practice documents in the organization's sector or industry.
- ☐ The Board has adopted a Code of Ethics that guides its members' behavior.

75%

- ☐ The organization is knowledgeable and in compliance with the laws of all jurisdictions in which it operates, and has a system for resolving conflicts of law questions.
- ☐ The code of conduct/code of ethics is a bilateral, evolving document, setting forth the mutual rights, duties, and obligations of both the organization and its employees.
- ☐ The code covers all employees, whether full or part time, occasional or regular, and those employed for fixed term or on open-ended contract.
- ☐ The code is global but addresses legal variations across countries.
- ☐ The code provides concrete actionable guidance with examples of real situations and how to address them.

50%

- ☐ Policies and rules that describe what employees should or should not do on behalf of the organization are written in plain, easily understood language, and are available in translation for all major language groups working currently in the organization.
- ☐ Policies and rules, and/or a code of ethics and business conduct, are available in written and electronic format, and are freely available and easily accessible to all.
- ☐ Policies and rules are updated regularly, as needed, with revisions circulated upon adoption by the organization.
- ☐ The code is based on the organization's core ethical values and describes the type of business conduct expected of employees in all their interactions internally and externally.
- ☐ The organization requires key employees to make regular disclosures concerning personal finances and possible conflicts of interest.

0%

- ☐ No ethics, integrity, or compliance policies or rules have been adopted by the organization.

25%

- ☐ Legal requirements about ethics, integrity, and compliance are met.
- ☐ Employees believe that ethics and obedience to law are identical or synonymous.
- ☐ The organization has adopted a code of conduct which provides basic guidance about legal compliance for employees.
- ☐ The policies and rules upon which the code of conduct is based are written by lawyers, and are available only in the primary language spoken at the organization's headquarters.

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Ethical Culture

5 : Organizational Culture

Addresses how the organization promotes ethical conduct in the context of its mission, vision, structure, and strategy. This category explores the degree to which an organization focuses on shaping its organizational culture (both the written and unwritten rules that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. This category addresses how culture promotes trust, respect and goodwill among individuals.

100%

- ☐ Most employees are proud to work at the organization and would describe it as a great place to work, where ethics, integrity, trust and fairness are highly valued.
- ☐ Employees can easily identify integrity role models in their current leadership ranks as well as in the organization's past leaders.
- ☐ The organization takes the long-term view, never sacrificing ethical principles for short-term financial gain.
- ☐ The organization describes its commitment to ethics and summarizes its accomplishments in this area in its annual report or through other publicly available communication channels.
- ☐ The organization values cultural diversity, but ethics and integrity are never compromised in the name of cultural relativity.

75%

- ☐ The organization promotes its commitment to ethics and integrity, and is willing to share both successes and failures with internal and external audiences.
- ☐ There are recognized positive ethical role models among the leaders of the organization.
- ☐ Employees generally feel good about the organization as well as its commitment to social responsibility, and can identify specific examples of positive ethical conduct.
- ☐ Employees feel safe speaking up (e.g., to "blow the whistle") if they encounter wrongdoing in the organization.
- ☐ Employees experience very little pressure to ignore rules, policies, applicable laws or regulations in order to get their work accomplished.
- ☐ Recruitment, promotion and performance management systems are procedurally fair.

50%

- ☐ The organization has broadly committed itself to ethics and integrity, even if there are some shortcomings.
- ☐ The culture of the organization is regarded as relatively open to discussion, dissent, and differing opinions.
- ☐ Leaders and others describe the organization's culture in terms of its values, mission, and ethical commitments to stakeholders.
- ☐ The history and traditions of the organization are seen as reflecting the ethical values of the organization.

25%

- ☐ The culture claims to support compliance and obedience to rules or laws.
- ☐ Employees perceive a significant gap between the organization's ethical communications and its actions.
- ☐ Employees tend to keep low profiles at the organization.
- ☐ Employees do not believe that they can speak out about wrongdoing without experiencing some type of workplace retribution.

0%

- ☐ The prevailing attitude about the organization is that it lacks a culture of mutual trust and integrity.
- ☐ Violations of ethical rules and standards are justified by referring to organizational or national culture or practice.

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Ethical Culture 6 : Disciplinary and Reward Measures

Describes how the organization sets and enforces its standards for ethical conduct and behavior. This category addresses rewards and punishments, incentives that promote ethical behavior, and disciplinary action taken to deter or punish unethical conduct. This category includes how the organization promotes ethical conduct through its performance appraisal process, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.

100%

- ☐ The organization is consistently regarded by employees as being fair in its internal administration of justice (e.g., grievance procedures or dispute resolution systems).
- ☐ The organization's policies and guidelines for discipline and reward are regarded as best practice in its industry.
- ☐ Leaders understand what motivates employees to act ethically or to act unethically, and have the training and tools necessary to motivate and reinforce ethical behavior.
- ☐ Ethical conduct is seen as one of the critical elements for promotion and advancement at all levels.
- ☐ Incentive schemes are routinely analyzed to avoid unintentional unethical consequences.

75%

- ☐ The organization recognizes and rewards ethical behavior and supports appropriate discipline when necessary.
- ☐ Leaders are experienced in taking disciplinary measures when necessary, and are swift to recognize and reward good conduct.
- ☐ The performance management system incorporates the organization's values and ethical principles, and assesses employee behavior against these expectations.
- ☐ The organization does not shy away from taking disciplinary action against high-performing, senior leaders who have acted unethically.

50%

- ☐ The organization has explicit policies for breaches of ethics, integrity, and compliance.
- ☐ The organization has adopted formal procedures that provide subjects of complaints with notice and an opportunity to be heard.
- ☐ The organization usually imposes disciplinary measures when misconduct is substantiated, based on the results of a formal investigative mechanism.

25%

- ☐ The consequences of unethical behavior are addressed only if these failures adversely impact business results.
- ☐ Unfair workplace treatment, especially on the part of management, is generally accepted as "how things are done here."
- ☐ Lower-ranking employees believe that the organization grants impunity to higher-ranking individuals.
- ☐ Leaders may tell others to "do the right thing" but this is regarded as not as important as getting results and delivering on business or financial expectations.

0%

- ☐ There is no policy addressing ethical breaches or lapses in integrity.
- ☐ There is no explicit system to either recognize ethical action or take disciplinary action for unethical behavior.

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Ethical Culture 7 : Corporate Social Responsibility

Examines the foundational principles of the organization. This category covers the organization's efforts to establish links with and invest in the communities and stakeholders with which it interacts. This category covers government relations, environmental consciousness, philanthropy, sustainability, and community impact.

100%

- ☐ The organization considers corporate social responsibility more than just philanthropy, and mainstreams it into everyday business practice.
- ☐ The organization provides financial resources as well as employee time and labor in a variety of community projects; employees are compensated for time spent working in the community.
- ☐ Facilities are located to serve and promote economic growth of the whole community, with particular attention paid to areas that have been historically ignored.
- ☐ The organization is generous in supporting and assisting other organizations in their ethics and integrity initiatives.
- ☐ The organization vigorously supports human rights and environmental sustainability in all its actions.

75%

- ☐ The organization thinks systemically, analyzing its social responsibility, investment and philanthropic policies in order to consolidate initiatives.
- ☐ The organization's involvement in the community and environment reflects long-range planning, and a commitment to diversity and inclusion.
- ☐ The organization sponsors scholarship and internship programs that positively impact communities where it has operations.
- ☐ Employees, managers, and leaders support the organization's engagement with social, educational, humanitarian, and environmental concerns as part of its ethical obligation to give back to the communities where the organization operates.
- ☐ The organization sponsors community, academic, and business events that promote ethical business conduct.

50%

- ☐ The organization makes charitable contributions and uses these to demonstrate its civic-mindedness.
- ☐ The organization addresses social and environmental issues related to its mission and publicizes its social responsibility policy.
- ☐ The organization supports the personal contribution of time, energy, and ideas to social and environmental concerns by its employees.

25%

- ☐ Motivated by public relations, marketing, tax reduction, or other perceived benefits, the organization involves itself in mainstream social causes, local government-related projects, the community, or the environment.
- ☐ The organization believes that the personal philanthropic efforts of its senior leaders satisfy any wider obligation to engage on social or environmental concerns.

0%

- ☐ There is little to no involvement, engagement, or support for the external communities with which the organization is associated.
- ☐ There is no outreach made to society at large.
- ☐ The organization simply responds to government inquiries or requests for information on social or environmental concerns, through formal (typically legal) channels.

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Ethical Culture

8 : Ethics Communication

Describes how the ethics and integrity strategy is articulated and promoted, both internally and externally. This category covers how the organization defines its stakeholders and how it crafts key messages for distinct audiences. This category considers both opportunities and ethical risks arising from the use of social networks and social media.

100%

- ☐ The organization directly connects ethical awareness and conduct with its reputation, and sensitizes everyone to the importance of communicating transparently and honestly about ethical behavior.
- ☐ Leaders are candid in their internal and external discussions about ethics and engage in conversations that explore ethical dilemmas they have faced.
- ☐ Leaders are sensitized to the degree to which they have become public figures and are circumspect in how they use mass media and social media communications tools.

75%

- ☐ An accessible, interactive ethics website provides links to ethics, integrity and compliance materials for employees.
- ☐ The organization's external website includes information about its ethics vision, goals, programs, and results.
- ☐ The organization publishes an annual report about its ethics function and corporate social responsibility, focusing on its goals, activities, and results, and distributes this report to internal and external stakeholders.
- ☐ The organization carefully navigates the boundary between privacy protection and its commitment to transparency.
- ☐ Employees receive specific guidance on the "do's and don'ts" of using social media and social networks. They are cautioned against confusing their on-line presence as individuals with their organizational or representative capacity.

50%

- ☐ The organization sponsors regular ways for employees to discuss ethics issues and to provide input to the organization.
- ☐ Examples of best ethical practices are identified and shared through a variety of communications media, such as websites, newsletters, e-mails, and blogs.
- ☐ Employees are encouraged to exchange their perspectives about how well the organization lives up to its commitments to ethics and integrity.
- ☐ The organization's dedicated communication functions – community affairs, internal communications, public relations, and marketing – are supportive of ethics initiatives and weave messages about integrity into other communications.

0%

- ☐ There are no formal communications or discussions about ethics and integrity.

25%

- ☐ If leaders talk about ethics they do so informally or on an ad hoc basis.
- ☐ Employees occasionally receive reminders about ethics-related policies and legal compliance requirements.
- ☐ Employees use the organization's social media and social networks without the benefit of guidance. As a result, they may indiscriminately use these media to promote personal or political agendas contrary to the organization's interests.
- ☐ Non-interactive website information (or print literature) is available about ethics and integrity.

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Explores ethics and integrity awareness, skill-building training, and the integration of such training into the overall development of employees. This category addresses the provision of ethics training throughout the life cycle of employees, and the degree to which these initiatives are integrated into other organization-wide training commitments.

100%

- ☐ The organization provides state-of-the-art ethics training to all board members, executives, managers, supervisors and employees, and establishes a minimum number of ethics training hours to be completed annually for each category of learner.
- ☐ Ethics education concentrates on enhancing ethical awareness, decision-making, leadership, courageous action, and personal accountability.
- ☐ The ethics training curriculum is predicated on an educational needs assessment that takes into consideration the organization's profile on risk, accountability, legal liability, and reputation.
- ☐ Ethics training is formally evaluated for effectiveness, regularly reviewed, and updated.
- ☐ The organization works with others in its industry, communities, and/or academia to sponsor research into ethics training effectiveness and evaluation methodologies.

75%

- ☐ The organization has adopted an ethics education strategy that includes the Board, leaders and all staff.
- ☐ Ethics education uses challenging and realistic situations that prepare participants to recognize, appreciate, and resolve ethical dilemmas that they will encounter in everyday business.
- ☐ Ethics is included in other development programs, such as leadership, management and supervisory training, as well as for specialized functions such as procurement, security, audit, and law.
- ☐ Instructor guides or tool kits are provided to managers with the expectation that they conduct ethics/values discussions on a regular basis.
- ☐ Ethics professionals help design, develop, deliver, and reinforce ethics education.

50%

- ☐ Ethics training is offered as a stand-alone course rather than integrated within the overall training and development curriculum.
- ☐ Training focuses more on rules and the organization's expectations than on ethical awareness-raising and analysis.
- ☐ Ethics training is offered to newly hired employees and to individuals promoted to front-line management.
- ☐ The organization uses an ethical decision-making methodology, tied to its core ethical values, that enables employees to resolve ethical dilemmas.

25%

- ☐ Training programs on ethics are brief (whether face-to-face or online) and focus on informing employees about policies and meeting legal requirements.
- ☐ Persons designing and delivering training do not have specific expertise in ethics.
- ☐ The value of ethics education is measured by the number of employees who have passed an end-of-program quiz.

0%

- ☐ There is no ethics or compliance education provided to employees.

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Ethical Risk Management 10 : Ethical Risk Assessment

Explores how the organization articulates and assesses ethical and reputational risk. This category describes how risk is defined, measured, and managed to ensure that the ethics and integrity strategy addresses those risks that are the most serious and most likely to occur.

100%

- ☐ The organization publicly reports on its ethics and reputational risk assessments, mitigation efforts, and internal controls. It routinely engages independent, external experts to assess its efforts.
- ☐ The organization actively benchmarks its ethics and reputational risk assessment methodology and results with peer organizations.
- ☐ The organization's operating risk management system ensures that risk events are discussed and measures taken to address root causes.
- ☐ Leaders take personal ownership for identifying, reducing, mitigating, and resolving ethical and reputational risks.
- ☐ The organization uses its ethics risk assessment to predict and plan for emerging ethical risks.

75%

- ☐ Findings and recommendations from regular risk assessment exercises are used to strengthen the organization's ethics and integrity initiative.
- ☐ The organization is adept at analyzing ethical risk data from multiple sources and across organizational boundaries to enhance internal controls and oversight.
- ☐ The assessment considers the likelihood, seriousness, and potential impact of each ethical risk. All relevant jurisdictions are considered when conducting a risk assessment.
- ☐ Particular attention is paid to supply chain and third-party risks, arising from procurement, partnerships, joint ventures, and public-private sector engagement.
- ☐ The organization uses its ethics risk assessment to inform its ethics education, outreach, communications, policy and advisory services.

50%

- ☐ The organization considers risk assessment as a tool to ensure that its ethics strategy focuses upon the most likely to occur, and the most serious, ethical risks.
- ☐ The organization uses both qualitative and quantitative methods to seek data from a broad group of stakeholders, in order to fully appreciate ethical risks.
- ☐ Sufficient resources are allocated to conduct a valid risk assessment.
- ☐ The assessment may consider risks from ethical violations, leadership failures, unresolved conflicts of interest, litigation, labor disputes, data breaches, privacy and confidentiality losses, accountability failures, loss of resources, and mismanagement.

25%

- ☐ Ethical and integrity risks are viewed as having minor or modest impact on the organization's ability to achieve results.
- ☐ The organization's enterprise risk management system focuses only on risks arising from legal and regulatory non-compliance.

0%

- ☐ The organization makes no effort to consider ethical or reputational risks as relevant to its long-term sustainability.
- ☐ The organization considers detecting ethical risks as an invitation to adverse litigation.

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Ethical Risk Management 11: Whistleblowing and Investigations

Explores how the organization encourages individuals to make reports about questionable conduct. This category describes the methods and protections offered to individuals who wish to make the organization aware of possible unethical behavior, misconduct, or illegal actions. This category covers how complaints about unethical behavior and misconduct are investigated, ensuring that the principles of due process are observed.

100%

- ☐ Internal investigations are independent, confidential, thorough, prompt, effective, objective and fair.
- ☐ Both callers and subjects of reports receive procedural due process protections including: (a) confidentiality; (b) opportunity to present witnesses and evidence; (c) opportunity to be heard and to respond; (d) opportunity to be represented by an advocate; and (e) ability to review adverse findings before action is taken.
- ☐ There are no adverse consequences for reporting misconduct. The organization acts promptly to resolve such reports. Disciplinary action is imposed without regard to rank.
- ☐ Victims of retaliation are made whole.

75%

- ☐ The organization offers both formal and informal methods, publicized throughout the organization, for resolving workplace disputes.
- ☐ Employees receive clear instructions on how, when, and why to call the hotline or helpline.
- ☐ Summary data are reported to management, the Board, and employees on a regular (at least annual) basis describing the kinds of matters that have been reported to the hotline or helpline and the outcome/ disposition of those matters.
- ☐ Investigators receive regular training on how to conduct fair, objective and confidential fact finding, ensuring that their conclusions are based on credible evidence rather than presumption or prejudice.
- ☐ There is a single set of rules that controls how internal investigations will be conducted, regardless of organizational unit.
- ☐ Supervisors and managers receive training on how to recognize and prevent retaliation.
- ☐ Investigations are consistently conducted to a reasonably thorough level.

50%

- ☐ The organization offers an independent and confidential channel or service (usually referred to as a hotline or helpline) where employees, or other third parties, can make reports or complaints about unethical behavior or misconduct.
- ☐ Retaliation and retribution against those who speak up is prohibited.
- ☐ Calls reported to the hotline or helpline are summarized and transmitted to a confidential point of contact in the organization responsible for determining whether each reported matter requires follow-up, referral, investigation, or resolution.
- ☐ Due regard to stakeholder privacy is provided.
- ☐ Reporters of workplace concerns may choose to remain anonymous.

25%

- ☐ Employees are directed to speak to their manager about unethical behavior or misconduct regardless of whether the manager is implicated in the reported matter.
- ☐ The organization has a policy that requires employees to follow the "chain of command" when seeking resolution of any workplace issue.
- ☐ The organization discourages the bringing forward of anonymous complaints about unethical behavior or misconduct.
- ☐ Investigations are not consistently or routinely conducted into allegations of unethical behavior, misconduct or illegal actions.

0%

- ☐ There are no channels for individuals to report possible misconduct.
- ☐ Employees are fearful of speaking up or challenging how decisions are made, and believe that that to do so would subject them to workplace harm.
- ☐ Employees believe that the act of reporting is futile, and that if they did so, the organization would offer impunity to higher-ranking individuals.

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Ethical Risk Management 12 : Conflicts of Interest

Covers the organization's ability to effectively manage personal conflicts of interest, eliminate favoritism, and eradicate self-dealing. This category considers the systems for recognizing, appreciating, and resolving personal conflicts of interest in the best interests of the organization.

100%

- ☐ Through regular organization-wide surveys, a large majority of employees report that they believe that promotions are based on performance rather than favoritism or nepotism, they can report observed misconduct without fear of retaliation or retribution, and they believe that reports of misconduct will be addressed promptly, thoroughly, fairly and professionally.
- ☐ All corporate and individual charitable and political contributions made by leaders are disclosed and reviewed for actual or potential conflicts of interest.
- ☐ The organization has an effective gifts registry program to track, analyze and address gifts received by both individuals and the organization.
- ☐ The Board, Audit Committee, or their equivalent receive and evaluate the effectiveness of the organization's programs to control conflicts of interest.

75%

- ☐ Responsibility for the organization's efforts to assess, prevent and mitigate conflicts of interest is assigned to a senior ethics official.
- ☐ The organization understands the importance of perceptions and therefore sensitizes employees at all levels to avoid even the appearance of a conflict of interest.
- ☐ The organization makes it clear that its ethical values preclude any behavior that creates conflicts of interest or favoritism.
- ☐ Written advice on conflicts of interest is provided with the reassurance that the advice, if followed, provides the employee with a "safe harbor" from subsequent discipline.
- ☐ Leaders are pre-screened for possible personal conflicts of interest before an offer of employment or promotion is made.
- ☐ Annually, designated individuals, including the Board, confidentially disclose their personal assets, liabilities, and outside activities in order to detect and remedy real or potential conflicts between the individual's and the organization's best interests.

50%

- ☐ Confidential advice on conflicts of interest is delivered in writing, outlining facts, issues, consequences, and recommended actions.
- ☐ Conflicts of interest are clearly defined and employees are trained in how to manage them, particularly through disclosure, caveats, and recusal.
- ☐ The organization has policies that strictly limit the offering, soliciting, or accepting of gifts and hospitality, entertainment, and travel subsidies.
- ☐ The organization has policies on acceptable outside employment, external activities, political involvement, loans to executives and key managers, and the employment of relatives or other close associates of staff.
- ☐ The organization works to reduce bias and favoritism in its decisions about recruitment, selection, promotion, benefits, compensation, and performance management.

25%

- ☐ Dealing with conflicts of interest is seen as procedural in nature and undertaken primarily for cosmetic purposes.
- ☐ Conflicts of interest may be resolved, but policies fail to specify the types of situations where conflicts of interest are likely to occur.
- ☐ Conflicts of interest are examined as compliance exercises, rather than as opportunities to enhance ethical awareness.

0%

- ☐ There is no recognition of the potential for conflicts of interest in the organization's policies, decisions, or undertakings.
- ☐ Organizational leaders refuse to believe that favoritism or self-dealing could influence their decision-making.

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Ethical Risk Management 13 : Confidentiality and Transparency

Covers the organization's ability to effectively balance its duty to maintain an appropriate level of confidentiality with its obligation to promote transparency in its interactions with stakeholders.

100%

- ☐ The organization is recognized as an outstanding leader at safeguarding the integrity of information, balanced by a climate of transparency and trust.
- ☐ The Board regularly evaluates the effectiveness of the organization in maintaining confidentiality and in promoting transparency.
- ☐ The organizational culture promotes asking questions about who needs to have access to designated information and how private information should best be protected.
- ☐ Through regular organization-wide surveys, at least 90% of employees report that they have full access to the information that they need to do their jobs and that confidentiality is respected in word and deed.

75%

- ☐ The organization sensitizes employees at all levels to both the importance of confidentiality as well as the value of transparency.
- ☐ Documents are clearly classified, so there is no ambiguity about what data is confidential.
- ☐ All staff act with care in handling confidential information.
- ☐ Stakeholders feel comfortable that their private and confidential information will be protected from inadvertent disclosure.

50%

- ☐ There is widespread recognition of the importance of keeping confidential records, and the organization respects stakeholder privacy.
- ☐ In the case of internal investigations, strict confidentiality is maintained.
- ☐ The organization has adopted policies that encourage transparency in communications with key stakeholders, while preserving confidentiality where appropriate.
- ☐ Leaders are trained to become effective communicators, thereby providing information to stakeholders in a timely and strategic manner.
- ☐ All staff are regularly trained and updated on how to protect confidential information.
- ☐ Financial and operational controls consistently protect confidential information.
- ☐ The organization publishes complete lists of their subsidiaries, affiliates, joint ventures, and other related entities, explaining ownership and investment structures and other relationships.

0%

- ☐ There is widespread perception that promises of confidentiality are not kept.
- ☐ There is no transparency in communications from the top. Employees, regulators, and other stakeholders are not kept current on information that is important to their work.

25%

- ☐ Maintaining confidentiality is recognized as a duty.
- ☐ Although some materials are labeled "Confidential", the rumor mill is strong, and there is low confidence that information will be protected.
- ☐ Leaders say they value and support transparency in the workplace, but the reality is different. Often, key information is withheld from employees.

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Ethical Risk Management 14 : Bribery and Corruption

Covers the organization's ability to effectively ensure that bribery and corruption are eliminated from all aspects of its operations.

100%

- ☐ The organization publicly reports on corruption and bribery risks and how these risks are addressed.
- ☐ The organization works actively within its stakeholder communities to promote societal initiatives, both nationally and internationally, designed to eliminate corruption and bribery.
- ☐ The organization provides effective protection from retaliation for the reporting of suspected misconduct, including but not limited to conflicts of interest, bribery, and corruption.

75%

- ☐ The organization has implemented a comprehensive anti-corruption program, including prevention, outreach and education, based on a full understanding of where it is most at risk.
- ☐ The organization extends its anti-corruption program to its third parties, including subsidiaries, agents, representatives, consultants, brokers, contractors, vendors, suppliers, partners, and joint venture parties. Failure to comply with the organization's requirements will lead to termination of the third-party relationship.
- ☐ The organization has adopted policies that ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery.
- ☐ The organization has a zero-tolerance policy for facilitation payments of any kind and requires prompt disclosure of all attempts to offer or accept bribes or corrupt payments of any kind.
- ☐ The Board regularly evaluates the effectiveness of the organization's programs to eliminate bribery and corruption.
- ☐ The organization has identified the senior official who has direct responsibility for the prevention, detection, investigation, and response to corruption.

50%

- ☐ The organization's commitment to zero tolerance of bribery and corruption is formalized in governance level policies which are widely disseminated.
- ☐ Bribery and corruption are defined as the offering, promising, or giving of any undue advantage, whether directly or indirectly, to or from a government official, a political candidate, party or party official, or any individual, including a person who directs or works for a private sector enterprise in any capacity.
- ☐ The organization has financial and accounting procedures that ensure fair and accurate records and accounts, which cannot be manipulated to hide bribery or corruption.
- ☐ The organization maintains no off-the-books accounts.
- ☐ The organization has implemented a structured financial disclosure program that requires annual confidential disclosure of assets, liabilities, and outside activities by all procurement, financial, and fiduciary employees as well as senior managers, leaders, and board members.

25%

- ☐ Bribery and corruption are not tolerated because it would be politically incorrect to do so.
- ☐ Bribery and corruption are narrowly defined, as the offering, promising, or giving of any undue advantage to or from a government official.
- ☐ The organization has adopted a stand-alone anti-corruption policy.

0%

- ☐ The organization has not implemented any system of effective internal controls, audit, or independent oversight.
- ☐ There is poor oversight on expenses or reimbursements for employees.
- ☐ The organization does not maintain accurate books and records, and may actively promote the use of off-the-books accounting.

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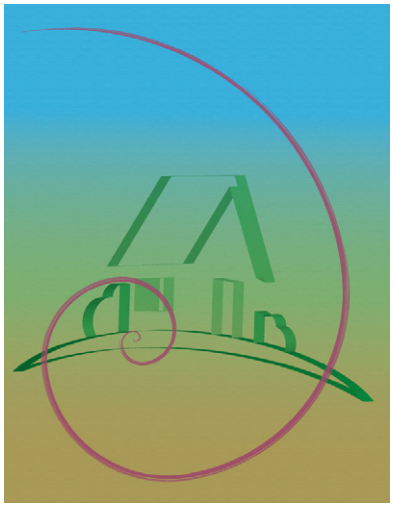
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Global Ethics and
Integrity Benchmarks

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