A simple approach to conducting an ethics survey

BY SHELLEY AUL

Do you have a “compliance and ethics program” or an “ethics and compliance program”?

Although some might argue this question is only about semantics, a wise man once told me that you should have the latter, because ethics comes first. Granted, the name of your program is just a name. However, this simple philosophy seems to make sense. If you have an ethical culture (acting in the spirit of the law), compliance (acting to the letter of the law) should naturally follow.

Now the question begs to be asked: Does your company have an ethical culture? One way to shed some light on this question is to conduct an ethics survey with your employees. Not only will the survey results help gauge the health of your program, but they will also assist in revealing your program’s strengths and weaknesses and aid in evaluating the effectiveness of your program.

Conducting an ethics survey does not have to be an overly complex and burdensome task. Trust me, a mathematician I am not. If you have not administered a survey before, you can start off simple with little to no additional resources needed. In fact, follow the tips below and you will be off to a great start.
Obtain executive stakeholder buy-in.
Some executives may cringe at the thought of surveying employees about ethics in the workplace. However, one cannot act like an ostrich with its head in the sand. If your company has areas of opportunity, isn’t it better to know now and fix them, as opposed to finding out when you are faced with a class action lawsuit or regulator investigation? Once you have executive buy-in, seek a sponsor (ideally, the CEO or chief ethics and compliance officer) who will assist with communicating the release of the survey to employees.

Be selective when choosing your questions.
Employees do not want to spend a lot of time taking a survey, so choose your questions wisely. I suggest using no more than ten questions. Those ten questions have to be worth it, so choose wisely. Areas of interest may be culture, supervisor and executive leadership’s ethical behavior, management’s response to concerns, observed misconduct, pressure to compromise standards, and if/how employees would raise concerns.

Examples:

1. How would you describe our company’s ethical culture on a scale of 1 to 4 (**with 4 being the strongest and 1 being the weakest**)?

2. Describe your direct supervisor’s display of ethical behavior on a scale of 1 to 5 (**with 5 being the strongest and 1 being the weakest**).

3. Have you felt pressure to compromise your standards in order to meet business objectives? Y/N

Benchmark your results against others.
To increase the return on investment of your survey, choose questions that you can benchmark against external sources. Doing so will help you see how your program ranks against others and help you prioritize areas to work on. You may find Ethics Resource Center’s National Business Ethics Survey and KPMG’s Integrity Survey to be helpful.

Make your survey anonymous and voluntary.
The subject of the survey can be sensitive for some. Employees may be less apt to participate if they feel they can be identified (which itself is a red flag for your program) and/or if they feel they are being forced to participate. It would be ideal if everyone participated, but you may get more candid responses if employees are able to opt-in.

Incorporate your survey into existing activities.
Employees are already inundated with emails asking them to complete training, acknowledge policies, etc. The survey may feel more natural if you are able to incorporate it into an already existing activity, such as Corporate Compliance & Ethics Week; the company newsletter; or a posting on your intranet site. You can then use management to help encourage their employees’ participation in the survey.

Identify a remediation plan.
Review the results with management, identify any areas of opportunity, create action plans, and most importantly, assign ownership.
Share your results.
Employees may be more willing to participate if they know that something is going to come of the results. In your communication about the survey, tell employees that you are going to share the results with them and let them know what actions are being taken to address any identified concerns. Then be sure to follow through. The results should also be shared with the board (as part of its oversight responsibility) and management.

Repeat.
The survey will have the most impact if you are able to conduct it periodically (e.g., annually or biannually). You will then be able to benchmark the company against not only external sources, but also against itself, demonstrating the progress and effectiveness of the program.

Summary
When all is said and done, your ethics survey results should give you a different perspective—the employee view—of your program and help you identify where you need to take action to strengthen your program to increase its effectiveness. And don’t forget, if you do not take action on your survey, you might as well have not done one in the first place.

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