ECI

Conversations for Ethics & Compliance Teams

TALKING THE WALK

Leader's Guide

The Gift That Keeps on Giving

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ABOUT ECI

The Ethics & Compliance Initiative (ECI) empowers organizations to build and sustain High Quality Ethics & Compliance Programs (HQPs). ECI provides leading ethics and compliance research and best practices, networking opportunities and certification to its membership.

Conversations for Ethics & Compliance Teams

TALKING THE WALK

At ECI, we know that you spend a great deal of time developing resources to help employees in your organization make good decisions when they face ethics & compliance challenges. In that same spirit, we want to provide you a resource to help you and your staff consider the challenges that YOU face as E&C professionals. Think of this as a regular opportunity for the professional development of your team.

We've developed this Leader Guide to equip you with the tools you need to lead a successful conversation with your team. To make this as painless as possible, we've scripted out much of what we suggest you say to your group. Scripted remarks are in the navy print. Optional scripted text is in green. We've also included key points (located adjacent to the script) in case you'd rather speak to the main points in your own words, or as a guide to help you if you lost your place while reading the script.

As an E&C manager and leader, you play an integral part in the growth of your team and in helping your organization to build and sustain a high quality ethics & compliance program. Thank you for all you do!

Each month, Organizational Members and Fellows of ECI are provided a new case study. The topics pertain to issues in ethics; compliance; leadership; managing up; working as a team; and more! Each case includes questions for discussion and some related statistics from ECI research.

GOALS

Through this training, we want your E&C team to:

- Discuss the challenges you face as E&C professionals in the work you do every day.
- Walk through what happens when a similar issue surfaces, including what managers and the team should do.
- Consider the alignment of your daily decisions with the core values of your organization.
- Think through ways your team can work better together.
- Talk about the resources available to your team to ask questions, seek guidance, or raise a concern.

SESSION OVERVIEW & TIMING

We suggest that you allocate 30 minutes of time for the following activities.

3 Minutes

- Introduce the Talking the Walk case study series and your interest in having your team discuss the case.

5 Minutes

- Distribute the case.
- Read the case aloud to the whole group.

20 Minutes

- Work through the two sets of discussion questions in the case (Talking the Talk and Walking the Walk).
- If multiple tables are working on the discussions:
    - Make sure each table has a leader. You can ask for volunteers or pick a selection criteria (who's been working for the organization the longest, next birthday, most pets, etc.).
    - Introduce the discussion question sets to the whole group.
    - Circulate during the group discussions, to get a sense of the themes of each table's conversations.
    - After the table groups have discussed the questions, ask discussion leaders to debrief about key themes from their tables' conversations. If time allows,

engage the full group in a brief conversation of any common themes and/or salient issues that arose.

2 Minutes

- Read the Concluding Messages and brainstorm ideas for future cases.

TRAINING MATERIALS CHECKLIST

- ☐ Leader Guide
- ☐ Copies of case (one per participant)
- ☐ Parking lot page (in case there are questions or topics you table for later)
- ☐ Copy of your organization's core values

TIPS FOR LEADING THE CASE CONVERSATIONS

- If your group is at a single table, sit down at the table, so you can be part of the group.
- We recommend you use a "Parking Lot" page. If there is a good, but off-topic question or one that you don't know the answer to, let participants know that you are going to "Park it." **Write it down (or ask a participant to record the comment) on the Parking Lot**. If you have time during your session, review the items that were parked. As needed after the session, make sure to revisit any lingering parked issues and questions.
- After each question you ask, wait at least ten seconds (count it out in your head) for participants to respond.
- Make sure to look at everyone in the room. (Be careful not to favor one side or the other, which most people do naturally.) Use eye contact to include everyone and encourage participation. When you look someone in the eyes, they are more likely to feel supported and answer.
- Aim to get each participant to speak at least once. If someone looks like they

have a thought, feel free to ask, "[Name], you look like you have something to say. Would you like to share with the group?" or ["Name"], I'd love to hear what you think."

- Avoid having one or two people take over the conversation. If necessary, gently taper individuals that are dominating, "Thank you, [Name], you've offered some great ideas. Let's hear what others in the room think."
- If you feel like the discussion is getting off course or stuck on a single point, redirect. "We've had some interesting conversation about this, but let's refocus a bit." Then return to the topic or question you want to discuss next.
- During the conversation, keep track of points you can include in your "recap" at the end of that case.
- Join in the conversation. Share your opinions and ideas. Correct mistaken ideas if the need arises.
- Include a personal story at least once, which creates an atmosphere of openness.
- Have fun! This discussion should be an enjoyable, engaging experience. Your positive attitude sets the stage.

TROUBLESHOOTING FOR CASE CONVERSATIONS

- If the discussion gets too heated and personal:
  - Step in and redirect the conversation.
  - Remind everyone of the goals of the session and that you're working as a team to help your organization and its employees succeed the right way.
  - Redirect the conversation back to the case (a neutral, safe space).
  - If necessary, explain that this is not an appropriate topic of discussion.
- If participants defend an unethical position:
  - Involve the other participants, so they can express the correct view.
  - Frame your questions in terms of your organization's values.
  - Do not be neutral. Take a stand, relate the proper ethical choice, and justify your position.
- If someone brings up a controversial issue, such as religion or politics, which is

outside of the realm of appropriateness for the discussion:

- Remind participants that it's important to respect differences, and that we do share our organization's values.
- Direct discussion back to the issue at hand and how it relates to the workplace.

STARTING YOUR SESSION: INTRODUCTORY MESSAGE

Begin the discussion with these opening remarks:

Thank everyone for their work and for being part of the discussion.

- Thanks for being here—and for all the good work you do for our company.

Review the goals for the training.

- I'm really looking forward to our conversation today. I enjoyed talking with you last time and am excited to have this time to talk together about:
  - challenging situations that arise in our work
  - how we meet those challenges
  - our core values, and
  - ways to help our team work together better.

Ask everyone to turn off their cell phones and put away their laptops.

- Just a quick reminder: This is a dedicated time together, so let's let go of distractions by turning off phones and putting away laptops.

CASE 10: THE GIFT THAT KEEPS ON GIVING

GETTING STARTED

Distribute a copy of the case to each member of your group. You may choose to:

- **Read the case aloud, and ask participants to follow along as you read. OR**
- **Give the participants a few moments to read the cases independently, then have a volunteer (*if someone volunteers*) read the case aloud. If no one volunteers, read it aloud yourself; do not select someone to read.**

CASE

THE CHARACTERS

Bethann: a younger employee, right out of college, in her first professional job

Francine: Bethann's roommate

Michael: Bethann's supervisor

"Thanks, Bethann, for springing for the good fruit. These are delicious!" Francine gushes while noshing on a fat, juicy pear.

"Happy to do it. Just one of the perks of my fab new job. Gotta love the holidays—and clients with generous expense accounts."

Francine is a little surprised by Bethann's response.

"Wow! Your work actually lets you keep stuff that comes in? In my office, everything gets sent back, donated, or added to the break room communal stash. They take it pretty seriously. Some big exec got in trouble for accepting box seats from a contractor, so they laid down the law."

"Yeah, but that's a vendor," Bethann counters. "Isn't that a different thing? It's like a bribe or something. But with your clients, they're already paying you. Why should it matter? When I was a kid, my dad was always bringing home fancy chocolates and those weird sausages no one ever eats that he got from his clients."

"Maybe it's just my company. They tend to take everything so seriously. Your work does seem more laid back."

The next morning...

Francine opens her email to the cheery monthly message from the CEO: business is going well, been a great year; at this time of year I'm reminded how thankful I am for you and all your hard work; great things ahead for us; etc, etc, etc.

Suddenly, her eye is drawn to a section, "Thank you in advance for your continued respect of the company gift policy. As you already know, it's critical that we avoid even the appearance of anything that could be deemed improper. We appreciate your understanding and diligence. It makes a difference!"

Well, that isn't the best news... I wish I'd known about the gift policy—yesterday. I don't know. Maybe they mentioned something about it at orientation. I just don't remember. They gave us so much information that week.... Bethann swallows hard. *Do I really need to speak to Michael about this? Ugh. He haaaates when I knock on his door.*

LEADER SCRIPT TO INTRODUCE QUESTION SETS

Point out the two categories of questions.

Before we dive in, just a quick refresher on the conversations. There are two types of questions we'll be discussing together: [Point out the two categories of questions on the handout.]

- Talking the Talk: the suggestions we would make to the characters in the situation.
- Walking the Walk: the relevance of this situation to us, and the ways we might address the issue.

Remind the group about the Parking Lot and its purpose.

Just like last time, we have a "Parking Lot," to capture your questions. We'll park good but off-topic questions, then work through them at the end as time permits. If there are any questions that I need to look further into, those will get parked as well. I'll make sure to circle back about any question on the Parking Lot that we aren't able to work through before we close today.

QUESTION SET 1

Talking the Talk: the suggestions we would make to the characters in the situation.

- What should Bethann do next?
- Whose responsibility was it to make sure that Bethann knew the policy?
- What could the company have done to help Bethann make the right call?
- Once Bethann tells Michael what she did, what should his response be? The company's?

QUESTION SET 2

Walking the Walk: the relevance of this situation to us, and the ways we might address the issue.

1. How likely is something like this at our company?
2. How good are we at informing employees of our gift policy and reminding them of it? Who else (other departments, managers, etc.) could we enlist in our efforts?
3. How would we handle an incident like this?
4. How well do we prepare managers to handle situations like Bethann's report to Michael?
5. Michael doesn't sound like a very approachable manager. What does our company do to ensure that supervisors encourage speaking up? What else could we do?

KEY POINTS TO MENTION

in case they didn't come up naturally during your conversation

- Although a lot of what we do is dealing with misconduct that occurs, one of the most important and fulfilling parts of our work is helping employees do the right thing. **Most employees want to tow the line, but they don't always know how.**
- **The better we are at communicating with them, the more likely they are to hear us and be equipped to face tough call.** The time we spend publicizing and explaining our values and policies makes a huge difference.
- **While we're at it, let's take a few moments to review our gift policy...**
  - **What's our policy?**
  - **Let's brainstorm challenging situations employees face related to the policy. What challenges do we – as E&C professionals – face in this area?**
  - **What are we doing to proactively prepare employees? What else could we do in the future?**

CONCLUDING THE CASE

Thank everyone for their honesty and insights.

- Point out a couple of good points you heard.
- If it didn't naturally come up in your conversation, be sure to mention:
  - The core values of your organization and how they apply to the decisions and actions of the characters.
  - Your perspective of how relevant the case is to your team, and how you would like your employees to handle the situation.
  - A personal story about a similar situation you faced, and what you learned from it.

FINAL COMMENTS

Thank everyone for the good work they do and for doing it with integrity.

- Before we close, I want to encourage you to come to me or any leader here with concerns and questions you have. I can't resolve issues if I don't know about them, so I need your help bringing concerns to my attention.
- We'll be respectful about both the issues you raise and your courage in raising them.
- I'm looking forward to our next case discussion.
- Thanks for the important work you do every day as part of the E&C team and for your commitment to our work.

We welcome requests! If you or any of your staff have ideas for future cases, please them to send to ECI at Tia@ethics.org.

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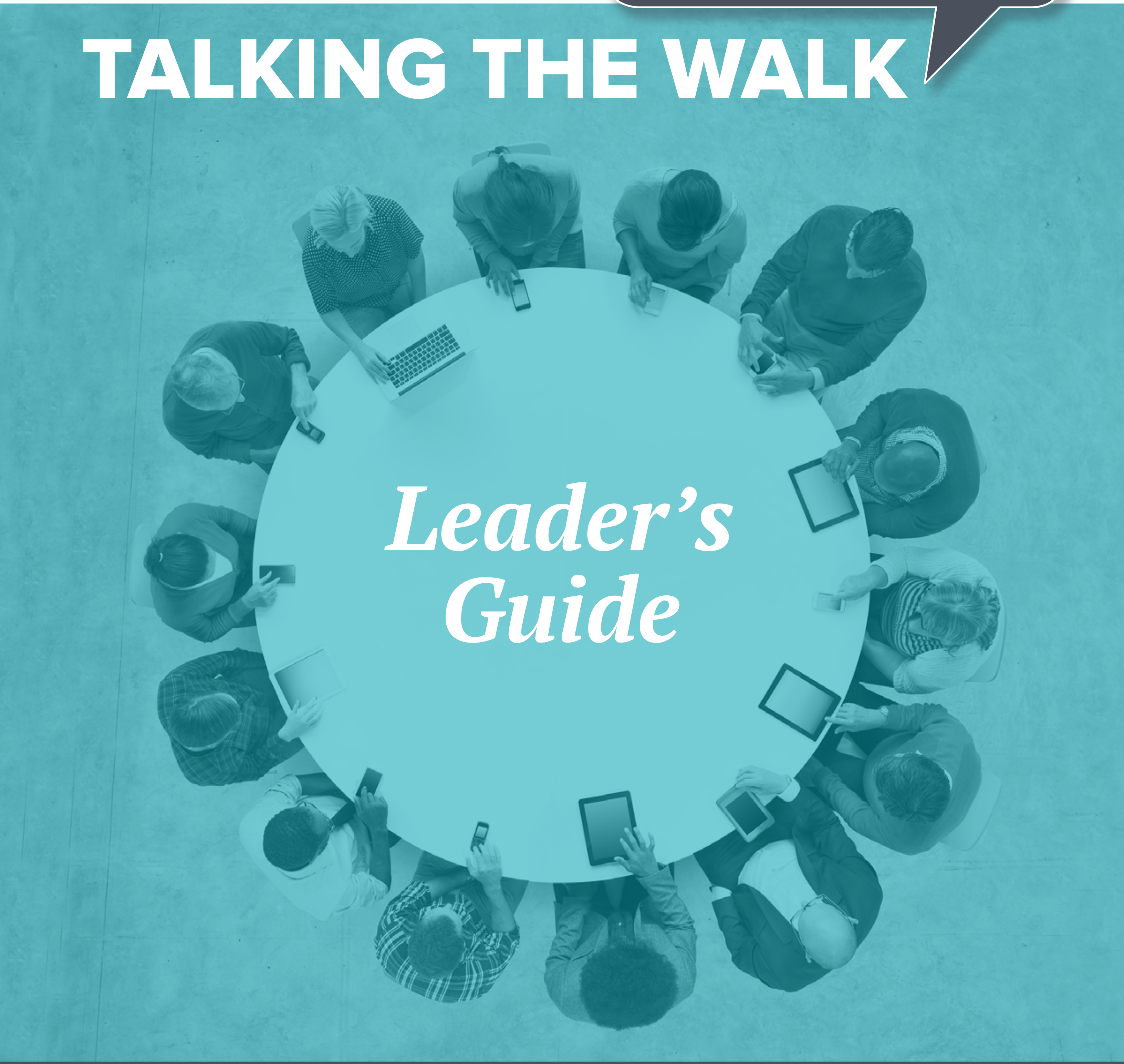

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