

## **So, You Want to Be the Conscience of Your Organization? Here's What It Takes**

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Frankly, the notion that a PR person could effectively and credibly be an organization's conscience has been troubling. The vast majority of us have little, if any, impact or contact with top management, where unfortunate, unnecessary, and unethical behaviors are initiated, allowed, ignored, encouraged, or forgiven. For many of us, our knowledge of operations is generally weak, which means that the only "bad behavior" we can spot occurs in familiar areas such as communications, human resources, maybe security, and the other staff functions. Ethical behavior in any organization begins at the top and requires relentless modeling, management engagement, encouragement, and an environment where integrity overrides all other considerations.

In many organizations, some serious ethics-related groundwork needs to be laid down before even an informal corporate conscience process can take shape and be appropriately delegated by management. Corporate ethics programs, to be completely effective, must have three crucial functioning elements: compliance programs, codes of conduct, and integrity development.

Any would-be organizational conscience needs to first identify whether an appropriate array of attitudes, ethical systems, processes, and training are currently available or in development. The truly ethical organization has developed and tries to maintain an environment of integrity where the culture expects everyone to move toward appropriate behaviors and decisions first, and whenever there is a choice.

Codes of conduct are legally driven and are generally the lists of things employees can't, shouldn't, mustn't, or could be penalized for doing: essentially lists of what not to do, with consequences.

Compliance programs consist of standards that set goals or minimum optimal procedures for behaviors, processes, decisions, and actions. These standards are monitored to determine how well an organization adheres to the rules set down in the law or regulation, including internal or industry measures. Compliance approaches are also quite legalistic and, generally, driven more by attorneys than anyone else in the organization.

Integrity is the atmosphere and culture created by the top leadership of an organization that teaches, fosters, coaches, and expects an employee's intention to do the best, most correct, or "right" thing first. It also promotes the obligation to report to appropriate authorities (in or out of the organization) when non-compliance, failure to adhere to the code of conduct, or omission, commission, or negligence occurs. Effective integrity development programs make everyone in

the organization a corporate conscience. To me, this is a powerful goal for the ethical communication leader. This is the real goal for the “corporate conscience.”

One place for the communicator to start is engagement in the existing compliance, code of conduct, and integrity development processes. These are powerful operational-level responsibilities. Specialized codes of conduct can be created for special circumstances. The great challenge of achieving ethical behavior is providing employees with useful, clear, and memorable examples of the right way to do things, how to acknowledge or identify inappropriate or unethical behaviors, and safe, clear ways to report bad behavior.

Another place to begin is an examination of your organization from a current ethical behavior perspective. There are easily recognizable patterns of behavior that indicate potential ethical problems. It is essential to identify them because there is another powerful pattern to consider – persistent unethical behaviors and decisions are often predicate activities to criminal behavior. Widespread, generally accepted unethical behavior almost always indicates that inappropriate, even criminal, behavior is present somewhere.

Knowing these behaviors is another key ingredient in building and maintaining an environment of integrity. Be alert for these insidious unethical behaviors:

1. Lax control: A manager’s careless enforcement, education about, and monitoring of ethical standards.
2. Lack of tough, appropriate, centralized compliance within each area of the company.
3. No one charged with responsibility of teaching, enforcing, and disciplining in cases where ethical breaches occur.
4. Leadership that allows supervisors to overlook bad behavior.
5. Leadership that allows employees to experiment with methods and tactics outside established guidelines.
6. Emphasis on “doing whatever it takes” to achieve appropriate business and financial goals.
7. Managers and supervisors who minimize the importance of oversight and compliance processes.
8. Structuring incentives in such a way that they can compromise the ethical behavior of people and the quality of the products and services delivered, and allow shortcuts to be taken for a variety of obviously questionable reasons.
9. Avoiding confrontation with managers who chronically misbehave or chronically overlook misbehavior.
10. The tendency to operate “on the edge,” always pushing for more than is appropriate.
11. Management that ignores the signs of and doesn’t question rogue behavior.
12. Management that tolerates the inappropriate behavior of individuals who are “critical to the organization’s mission.” They are the super sales people and high achievers who are allowed to break the rules to maintain their performance.
13. Belittling or humiliating those who suggest or seek ethical standards.
14. Dismissing or destroying the careers of employees who report bad or outright wrong behavior.

15. Demeaning the internal or external credibility of those who blow the whistle and those who report or bring management's attention to lapses in ethics.

This list of behaviors is an effective tool for quizzing company management when serious problems have occurred or if you suspect that bad decisions and behaviors could be happening. My technique is to gather all senior managers and distribute this list of unethical behaviors. Then I ask these managers to circle those currently occurring in their area of the business or in another area they are aware of, and to jot down some identifying or descriptive information. Quite often, before I even finish my introduction, these senior managers are circling behaviors from the list. Invariably, the company has been doing a number of things as a matter of routine without thinking of them as unethical or as predicate behaviors that could lead to something more serious.

The communicator's most useful role is in helping create an environment of integrity. Employees seek to be in such an atmosphere. Specifically, such an atmosphere is required in public companies under the Sarbanes-Oxley laws. Truly being management's conscience is a serious, complicated, and badly needed staff service in which, at the moment, very few PR people happen to be engaged. If you are interested in building integrity in your organization, this work is far more important than being the corporate conscience. When you focus on integrity, your goal becomes making everyone a corporate conscience.

Ethics is now a mainstream management obligation. It's time to pick your spot, take your position, get in there, and play for keeps. Or, as Josiah Bartlet, the U.S. President from "The West Wing" would say, "Breaks over; game on."

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