

Exploring the Role Performance of Corporate Ethics Officers

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ABSTRACT. Organizations continue to show renewed focus on managing their ethics programs by developing organizational infrastructures to support their ethics implementation efforts. An important part of this process has been the creation of an ethics officer position. Whether individuals appointed to the position are successful in the role or not may depend on a number of factors. This study presents a suggested framework for their effectiveness. The framework includes a focus on personal, organizational and situational factors to predict performance in the role. The study examines the complex nature of the role. These include task complexity, low task visibility, role conflict, and role ambiguity. Personal, organizational and situational factors that can serve as buffers against the complexities associated with the role are presented. The study suggests that individuals with certain competencies and orientations may be better suitable for the ethics position, and firms need to consider key organizational and situational issues critical to the performance of an ethics officer. The research and practice implications of the study are given.

KEY WORDS: ethics officers, ethical leadership, ethical infrastructure, value-based management, technical awareness

There is a renewed focus on corporate integrity in the U.S. Well-publicized cases of corporate scandals such as Enron, Tyco and WorldCom demonstrate the enormous cost of corporate misconduct for employees, investors, and society as a whole. Public outcry and government responses to the recent spate of corporate malfeasances may have something to do with the renewed interest in corporate ethics. For example, both the Sarbanes-Oxley (SOX) Act of 2002 and the 1991 Federal Sentencing Guidelines, both in the U.S., provide important guidelines, including some severe consequences, for ethical violations by businesses. At the same time, the U.S. Sentencing Guidelines provide some relief to firms

that have a demonstrated commitment to ethics. The U.S.A. is not alone in imposing pressure on firms. In the U.K., the Cadbury Report and its recommendations provide similar guidelines for firms and the European Union is known to be developing ethical guidelines for corporate conduct.

Organizations continue to develop strategies, including the design of ethical infrastructures, to manage their internal ethics programs. One increasingly important part of this strategy is the appointment of a corporate ethics officer (Austin, 1994; Izraeli and BarNir, 1998). A corporate ethics officer is an individual responsible for helping an organization manage its ethics programs by providing leadership and oversight. Although a recent phenomenon, the importance of this role has grown remarkably in recent years as indicated by the formation of the U.S. Ethics Officers Association (EOA), a self-governing professional association of corporate ethics officers.

The EOA was created in 1991 as an umbrella organization for all professionals who are responsible for ethics compliance programs within corporations and organizations. The membership list (both corporate and not-for-profit organizations) includes some of the largest Fortune 1000 companies such as McDonald's Corporation and Microsoft. Membership also includes government departments such as the Los Angeles Unified School District and the Massachusetts Bay Transportation Authority. The association has declared that its mission is "to promote ethical business practices, serving as a forum for the exchange of information and strategies" (<http://www.eoa.com>). The EOA sponsors conferences, organizes forums, has a compliance library and shares administrative software that assists ethics officers in collecting and managing ethics in their respective organizations.

Although the growth and visibility of an ethics officer position is impressive, there has been very

little research done on the topic. The scant research that exists on the topic has focused on the ideal profiles of ethics officers (see, e.g., Izraeli and BarNir, 1998; Petry and Tiez, 1992). These studies have assisted our understanding of the role of ethics officers, but gaps remain. For example, we know little about the nature of the role as well as what determines performance in the role. We also have limited knowledge about the type of individual most suitable for the role. This is surprising given the central role organizations expect ethics officers to play in managing their ethics programs.

This paper attempts to bridge some of the lacunae by focusing on the personal, organizational, and situational factors that may promote successful performance in the role. The paper is structured in the following manner to explore the issues. First, the task descriptions, including the personal factors and competencies that are likely to increase role performance are presented. Second, the organizational and situational factors are discussed. Finally, the policy implications of the paper are presented.

The research develops a framework that focuses on personal and organizational context factors that determine performance in the ethics officer's role. Figure 1 is a schematic summary of the main arguments in the paper. Factors considered include individual, organizational, and task characteristics. The

framework posits that a configuration of personal factors and competencies will reduce the challenges associated with the role, (-) and that, in turn, will positively affect role performance (+). Situational and organizational factors also have a positive effect on performance. The presumption is that a person appointed to the position, and the nature of environment, within which they operate, will affect performance in the role. The variables included in the framework are based on prior research.

Prior organization research has shown that individual role performance depends, to some extent, on the nature of tasks facing the individual (Hackman and Oldham, 1976). Research has also shown that the personal characteristics of individuals, including their competencies and ability to deal with role conflict, ambiguity and influencing ability affect their role performance (Flynn et al., 2001; Howell and Higgins, 1990; Kelly et al., 1981). Organizational and situational factors, including job characteristics and ethical climate also affect role performance (Trevino, 1986; Victor and Cullen, 1988). Ethics officers are supposed to be champions of ethical integrity and so their own moral integrity can become an important factor for performance (Trevino, 1986). Management research has also shown that considering the complex nature of the role, how an individual is recruited, including the sources

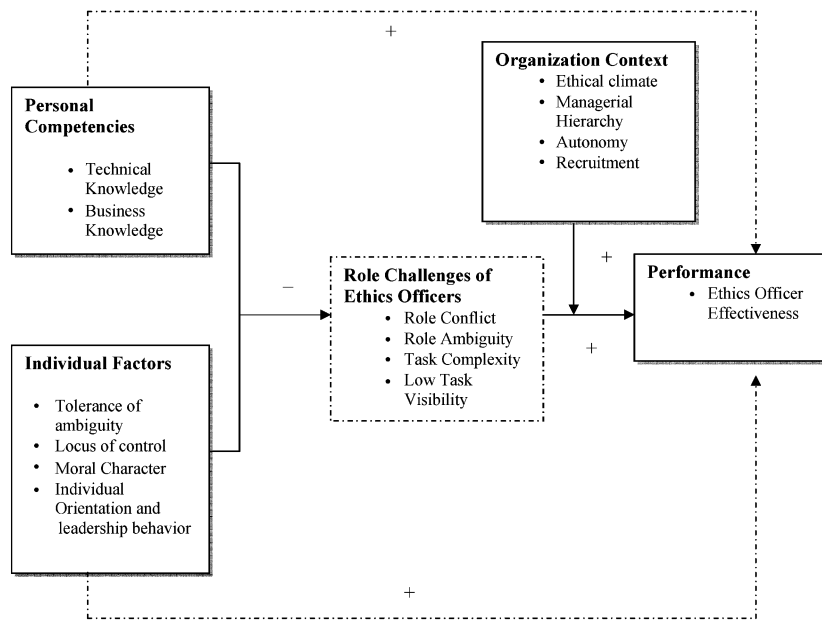


Figure 1. A framework for understanding ethics officer performance.

of recruitment as well as the clarity of information they have about the role before being hired, may affect their effectiveness (Wanous and Colella, 1989).

A greater understanding of the role of the ethics officer, including factors that promote performance in the role, is important for at least three reasons. First, we are likely to see even greater number of firms creating the position as part of managing ethics in their organizations. Provisions of two key pieces of legislation provide a reason for firms to create this position. Both the SOX Act and the 1991 Sentencing Guidelines call for a reduction in penalties for erring firms that can demonstrate that they have a comprehensive ethics program, including the presence of an ethics manager.

Second, the appointment of an ethics officer does not guarantee their performance. Some preliminary evidence indicates that ethics officers have little impact on the reduction of ethical transgressions within organizations (American Management Association, 1999). Worse yet, some evidence raise the troubling possibility that managers themselves have doubts about the effectiveness of ethics officers. For example, Jose and Thibodeaux (1999) found that ethics officers are ineffective in institutionalizing ethics in organizations. Finally, there seems to be a lack of clarity on the responsibilities of ethics officers. For the most part, the position remains ill-defined (Petry and Tiez, 1992). Current descriptions of the ethics officer role remain vague. For example, organizations, including the EOA continue to define the responsibility of an ethics officer to include improving the organization's ethical performance (Izraeli and BarNir, 1998). Such a broad mandate may satisfy legislative requirements but are hardly specific enough to serve as a basis for developing a workable job description, let alone developing a useful performance measurement of the role.

Ethics officer roles

The EOA defines an ethics officer as a leader in the area of business conduct. The Association lists some of the key responsibilities of ethics officers to include the following:

- Global accountability for developing and directing an organization's ethics;

- Compliance and business conduct function for the total corporation or organization;
- Providing leadership, oversight, and expert advice to ensure development, interpretation and implementation of ethics and compliance strategies, programs and policies;
- Accountability for all program activities relating to standards of conduct including ethical relationships with customers.

A review of a number of company websites and direct phone calls to a number of companies yielded some of the following titles used by ethics officers:

- Assistant vice president and director of compliance programs;
- Director of ethics and compliance;
- Corporate manager, compliance;
- Vice president, ethics, compliance and internal audit;
- Director of corporate compliance and
- Director of integrity, security and compliance.

Nature of tasks and ethics officer roles

Every organizational role comes with expectations and responsibilities. The ethics officer's position is unique in the sense that it faces multiple, sometimes competing, expectations from groups, or subsystems in the organization. These include the rank-and-file, top management, the Board of Directors, and to some extent, institutional owners. Each of these groups of stakeholders may have their own expectations. Employees of the organization may see the ethics officer primarily as an investigator or someone searching for problems. If they perceive the ethics officer in a more constructive light, they may see him or her as someone to whom they can send their complaints. Top management, for its part, may expect the ethics officer to serve in an advisory role on corporate integrity issues (DiPiazza, 2001). The Board, on the other hand, may see the ethics officer as an extra pair of eyes and ears with a direct line to them, bypassing the management team, if need be. Institutional owners may similarly see the ethics officer as a buffer against ethical violations. Operating in several subsystems raises important implications for the effectiveness of the ethics officer.

An examination of the existing job descriptions of the ethics officer confirms that an ethics officer faces a complex set of expectations. A content analysis of a 2002 member survey of the responsibilities of ethics officers by the EOA found on its website reveals at least five broad categories of responsibilities shown in Table I. These include responsibility for ethics education, compliance, advising, investigative oversight, and corporate social responsibility.

Role characteristics of ethics officers

The diversity of responsibilities facing ethics officers and their position in multiple organizational subsystems has important task performance implications. Four important characteristics of task and role performance are relevant for our understanding of the challenges ethics officer face as well as the personal and situational buffers we can create to ensure their effective role performance. These are role conflict, role ambiguity, task complexity, and low task visibility.

Role conflict

The job description of the ethics officer shows that he or she has several role-sets. A role is a set of expectations attached to an office, title or occupation (Parsons, 1951). Where a position involves several

roles, an individual may face role conflict in the performance of their task responsibilities. There is role conflict when individuals hold many roles and the behaviors expected of the roles are in disagreement or conflict. According to Katz and Kahn (1978, p. 197), “the process of organizational role-taking is simplest when a role consists of only one activity, is located in a single subsystem of the organization, and relates to a role-set all of whose members are in the same organizational subsystem.” As previously mentioned, the ethics officer faces role-sets of members that are not necessarily in the same organizational system. Besides the four subsystems of roles identified, the personal values, and organizational policies may create additional role demands on an ethics officer. The several sources of role demand result in several types of role conflict. Rizzo et al. (1970, p. 155) identify four principal types of role conflict that may be relevant to our understanding of the nature of role conflict an ethics officer faces:

- (1) *Person-Role conflict*: “Conflict between the focal person’s (ethics officer in this case), internal standards or values and the defined role,”
- (2) *Intra-sender conflict*: “Conflict between the time, resources, or capabilities of the focal person and defined role behavior,”

TABLE I
Job responsibilities of ethics officers

Category	Type of responsibility
Ethics education	<ul style="list-style-type: none"> • Training design • Training delivery
Manage compliance	<ul style="list-style-type: none"> • International program development • Management of program documentation • Direct handling of hotline/guideline/internal reporting • Assessing/reviewing vulnerabilities • Preparation and delivery of external presentations
Advise top management	<ul style="list-style-type: none"> • Establishing company policy and procedures
Investigative oversight	<ul style="list-style-type: none"> • Senior management and/or board briefings/communications • Overseeing investigations of wrongdoing • Conducting investigations of wrongdoing
Corporate social Responsibility	<ul style="list-style-type: none"> • Community relations • Corporate foundation/giving • Shareholder relations • Diversity • Environmental compliance and human rights

- (3) *Inter-role conflict*: “Conflict between several roles for the same person which require different or incompatible behaviors,” and
- (4) *Inter-sender conflict*: “Conflicting expectations and organizational demands in the form of incompatible policies.”

Ethics officers may be vulnerable to some, or all of the various types of conflict. First, ethics officers may experience person-role conflict. This conflict arises when the personal values of an ethics officer are in conflict with the defined role. Conflict between the personal values of the ethics officer and their role expectation may lead the ethics officer to either behave according to their own values, or behave in a way that is consistent with their role expectation even if this is in conflict with their own values. In either case, the ethics officer may experience some role stress. Role stress is an internal conflict generated by role behavior.

Second, the ethics officer is most likely to experience inter-role conflict because they operate in several role subsystems. Inter-role conflict is, “conflict between several roles for the same person which require different or incompatible behavior” (Rizzo et al., 1970, p. 155). For example, the role description presented in Table I shows that there might be incongruence between the ethical leadership and investigative/monitoring dimensions of their role. In addition, the role expectations of outside stakeholders may conflict with those of the organization. In the event of role conflict, an ethics officer may choose to perform those roles he or she identifies with. In other cases, faced with role conflict, an ethics officer may excel at one role and fail at others.

Third, the ethics officer may experience inter-sender conflict. This is conflict involving “incompatible policies, conflicting requests from others, and incompatible standards of evaluation” (Rizzo et al., 1970, p. 155). Although the ethics officer occupies one role, he or she may experience role conflict if there are conflicting role expectations from all the constituents. We can presume that an ethics officer is most likely going to face conflicting requests and expectations from all the stakeholders he or she has to deal with in the performance of their job. For example, the top management team may expect the ethics officer to be its “sounding board” on ethical issues while the rank-and-file expects the ethics

officer to focus more on issues related to top management violations. Both expectations are legitimate, but may be in conflict with each other.

Finally, an ethics officer can experience intra-sender conflict or “conflict between the time, resources, or capabilities of the focal person and defined role behavior.” An ethics officer will experience this type of conflict when he or she does not have the type of skills or competencies needed for role performance, or when they lack needed resources. This sort of role conflict generates another dysfunction called role overload. Role overload occurs when an individual perceives that the cumulative role demand exceeds his or her ability to perform a task.

Role ambiguity

A second characteristic of an ethics officer’s job is role ambiguity. According to Kahn et al. (1964), role ambiguity occurs when a role performer lacks information required to do their job; receives contradictory messages from different role senders or receives conflicting information from the different subsystems in the organization. Role ambiguity may also occur when an ethics officer lacks personal knowledge of their task responsibilities.

Task complexity

The third characteristic of an ethics officer’s job is task complexity. A task is complex if its attributes increase information load on the task doer. Complex tasks also place high cognitive demands on the task doer (Steinmann, 1976). Complex tasks often are ill structured, ambiguous, and difficult. However, because a task is difficult does not necessarily mean it is complex. The ethics officer’s task may be complex because of information overload. It may also be complex because achieving one goal, may conflict with another (Campbell, 1988). For example, performance of the investigative function may stand in the way of the effective discharge of the ethical education role because both roles seem opposed to each other.

Task visibility

Another important characteristic of the ethics officer's job is that it has low task visibility. Jones (1984) suggests that task visibility depends on the extent to which an individual role performer's work context permits the monitoring and evaluation of their performance. Task visibility can be high or low depending on how easy it is to monitor and evaluate an individual's direct contributions. The ethics officer's job has low task visibility for at least two reasons. First, ethics officers cannot do their jobs effectively without the input and cooperation of others. In terms of interdependence, ethics officers need to interact and get feedback from employees and management. Second, the unstructured nature of an ethics officer's job means it is difficult for them to perform their job without considerable input from others. Both conditions make it difficult to monitor and evaluate the ethics officer's individual contributions.

The characteristics of role conflict, ambiguity, task complexity and low task visibility can lead to a set of dysfunctional consequences. These include role stress, hostility, dissatisfaction, low productivity, difficulties in decision-making and distortion of reality (Katz and Kahn, 1978; Rizzo et al., 1970). When faced with role stressors, individuals may adopt strategies, including the use of negative behaviors such as lying and deceit, as a way of managing role conflict (Grover, 1993). In other cases, individuals facing role conflict may choose their priority role, quit, resign from the role or create a compromise by partially fulfilling multiple expectations. Grover (1993) also notes that people may use "voice" (Hirschman, 1970) as a response to role conflict. Voice involves attempts to change role demands whereby the role performer forces role senders to reconcile their conflicting expectations. The discussion of the nature of task characteristics that ethics officers face suggests that they may suffer from all the role stressors discussed. The preceding discussion is the basis for the following proposition.

Proposition 1

Ethics officers will experience role conflict, role ambiguity, task complexity and

low task visibility in their role. In turn, these dysfunctional task characteristics will lead to role stress.

Individual factors and role performance

Factors that help to reduce role stressors can be helpful for ethics officer's effectiveness. Existing research has shown that individual factors affect role behavior. Figure 1 indicates that four individual factors may affect the effectiveness of ethics officers: tolerance of ambiguity, locus on control, moral development and personality orientation and leadership behavior.

Tolerance of ambiguity

An ethics officer is expected to perform effectively in an environment characterized by task complexity, ambiguity, information overload, and cope with conflicting demands from multiple stakeholders. Navigating such complex performance domains requires adaptability and flexibility, and an ability to deal with organizational, and task ambiguities. Individuals who have a personal mastery and tolerance for uncertainty and ambiguity should be more effective than those with low tolerance of ambiguity should.

Research has shown that some individuals are better at managing ambiguity than others are. Budner (1962, p. 29–30) identifies intolerance of ambiguity as a personality variable. He defines ability to manage ambiguity as "the tendency to perceive ambiguous situations as desirable." Conversely, intolerance of ambiguity is "the tendency to perceive ambiguous situations as sources of threat." A situation is ambiguous when there is a lack of sufficient information, and this lack emerges in three contexts: (a) a completely new situation in which there are no familiar cues," (b) "complex situation in which there are a great number of cues to be taken into account," and (c) "a contradictory situation in which different elements or cues suggest different structures—in short, situations characterized by novelty, complexity, or insolubility."

An ethics officer may experience role ambiguity because of lack of information that arises from all the three contexts. Earlier descriptions of ethics officer roles suggest that they need to routinely deal with ambiguous situations. For example, ethics officers have to act on incomplete information in their investigative roles. Mr. DiPiazza, the CEO of Price-waterhouseCoopers (PwC) concedes that ethics officers face ambiguity. He notes of ethics officers, "You have a tough role. You navigate the grey everyday. It is not an easy thing to do," (DiPiazza, 2001, p. 717). It may also be difficult for an ethics officer to determine what exactly they are supposed to be doing and plan adequately for it because of the unstructured nature of the tasks they face. Both conditions create performance ambiguities for the ethics officer.

An individual who is able to deal with ambiguity should perform better in the role than someone who requires clarity and certainty of information before acting. Ethics officers who have a high tolerance for ambiguity should perform better than those with low tolerance of ambiguity because such individuals can still be confident about the decisions they make in an ambiguous situation without attempting to necessarily seek additional information (Teoh and Foo, 1997). Individuals with a high tolerance of ambiguity are also better at adapting more quickly to situations. More importantly, such individuals are more persistent, take greater initiative, and are pragmatic and generally optimistic people (Tuckman, 1966). Ethics officers with tolerance for ambiguity should be better prepared to deal with the different role expectations they face. Such individuals should also be better motivated and prepared to navigate the gray areas of ethical behavior than people with low tolerance for ambiguity. For example, Stoogdill et al. (1965) found that effective union leaders had a high tolerance for ambiguity. Like union leaders, ethics officers operate in multiple subsystems in their organizations and face all sorts of role conflicts. Therefore, the ability to tolerate ambiguity should positively influence performance in the role. The research and discussion is the basis for the following proposition,

Proposition 2

The probability of an ethics officer's effectiveness increases with their ability to tolerate ambiguity.

Locus of control (LOC)

Another important personality dimension considered in this study is locus of control (LOC). Rotter (1966) developed and labeled a construct called LOC. Simply put, LOC reflects the belief individuals have about who controls key events in their lives: themselves or various external, uncontrollable forces (Miller et al., 1982; Rotter, 1966). People either have internal or external LOC ("internals" versus "externals"). Research indicates that individuals who have internal LOC believe that their achievements, success, and personal accomplishments are largely due to their own actions, skills and initiatives (Carpenter and Golden, 1997). Conversely, people with external LOC believe external forces control their lives and therefore see external factors as critical to their performance. Doubts about the cross-cultural validity of the LOC construct have not prevented its continued use an important individual personality trait in research and previous research has linked executive LOC to high levels of organizational performance (Miller and Toulouse, 1986) and innovation (Miller et al., 1982).

Related research on the individual level suggests that executives with internal LOC will tend to use persuasive, not coercive approaches to leading (Mitchell et al., 1975). Internals also seek multiple information input before acting, and are better team leaders than externals (Anderson and Schneier, 1978; Finkelstein and Hambrick, 1996). Further, internals are self-assured, confident, and are good self-learners (Spector, 1982). Such individuals are also more likely to take initiative to control situations, because internals actively use negotiation and other initiative-based strategies to achieve results as well as monitor their own performance (Spector, 1982). An internal will also actively seek and use task-relevant information even if it were not readily available (Davis and Phares, 1967). Conversely, "externals" would demonstrate more hopelessness and lower

ability to reverse adversity (Luzzo and Ward, 1995). This is important given that an ethics officer manages ambiguity and may experience role stress as pointed out earlier.

Individuals with these qualities or traits should perform better as ethics officers than those with an external LOC because of the nature of task environment they face. The qualities and dispositions of internals should be particularly useful in an ethics officer's role because of the unstructured nature of the job. Management research has also shown that "internals" often establish long-term plans and gather more information about their environment (Hodgkinson, 1992). This should help the ethics officer's monitoring and investigative roles. Snyder and Coupland (1989) also suggest that high self-monitors may be better at managing boundary roles across different identity groups because they tend to be more responsive to the different expectations that different groups have about each other. This is critical as the ethics officer manages across several stakeholder groups. Ethics officers engage in boundary spanning activities, must persuade, seek information, and generally take initiative to perform their role. They also need to take greater responsibility for their own successes by seeking information when necessary. These are all the characteristics of "internals." The preceding research and discussion demonstrates that compared to "externals," an ethics officer with an internal LOC would demonstrate the qualities necessary for success in the role. More formally, it is suggested that,

Proposition 3

The probability of an ethics officer's effectiveness increases with their ability to take responsibility for their own performance, such that individuals with an internal LOC will be more effective than those with external LOC.

Level of moral development and moral character

The individual moral maturity and character of an ethics officer is another personal factor likely to affect their role performance. The EOA suggests that an ethics officer must be an individual of highest integ-

riety. An ethics officer's job essentially calls on him or her to exercise ethical leadership within a complex set of circumstances. Whether they succeed or not may depend on how principled they are as individuals. In other words, their moral maturity and character should have a positive effect on their job performance.

Kohlberg's model of cognitive moral development (Kohlberg, 1981) provides some clues about how an individual's moral development influences the way they think about ethical issues. Kohlberg has identified three levels of moral development (pre-conventional, conventional and principled), noting that most adults make moral decisions at the conventional and principled levels. According to Kohlberg's model, an ethics officer operating at the principled level of moral development will tend to think about ethical issues and uphold values regardless of what others think. Trevino (1986, p. 610) observes that principled individuals "may also be more likely to resist external influence, try to change the situation, or resign their positions if they find themselves in situations where they have to behave unethically." Grover (1993) also suggests that principled individuals are more likely to engage in voice, believe in their own internal set of principles, and not rely on situational cues to guide their role behavior.

Kohlberg's theory sheds light on how people think about moral issues but not how they will necessarily act. Of course, we can predict how an individual is likely to act based on the way they think. The theory of reasoned action and planned behavior (Ajzen, 1991; Ajzen and Fishbein, 1980), posits that there is a correspondence between intentions and action. A presumption that the way individuals think about ethical issues is the way they will actually act is consistent with that prediction.

We can also link moral development, thought, and action by examining how an individual's personal virtues (*a lá* Plato) affect their character formation and individual behavior. Kohlberg (1981) suggests that principled individuals have a moral character. Mendonca (2001, p. 269) defines moral character as "inner-directed and habitual strength of mind and will," and suggests that moral character is developed by practicing virtues. He writes, "Through the practice of virtues, leaders acquire the inner-directed and habitual strength of mind and

will to incorporate moral principles in their behavior.” Mendonca observes that moral character hinges on Plato’s four cardinal virtues: *prudence*, *justice*, *fortitude*, and *temperance*. Mendonca discusses these virtues in the context of their importance to moral behavior and we borrow from his work to explain this part of the paper.

Prudence is the first of Plato’s cardinal virtues. It refers to the use of the right standards to assessing situations before making decisions. A prudent person will seek and consider opposing views before making any judgment. Ethics officers may have to deal with conflicting information in their investigative roles and those who practice the virtue of prudence may be less likely to succumb to pressure and remain neutral in the discharge of their duties. The *justice* virtue requires that individuals be fair to everyone. Mendonca (2001, p. 269) observes that in terms of leadership, justice means “the exercise of responsibility that balances, in a fair manner, the rights of all stakeholders.” An ethics officer who practices the justice virtue will consider the interests of all stakeholders in the performance of their responsibilities. When conflict arises in terms of expectations, a “just” ethics officer will make choices that are fair to all concerned. *Fortitude*, the courage to take risks, is another virtue. Upholding ethical integrity is the primary challenge of an ethics officer. An ethics officer with fortitude will be prepared to take great risks in pursuit of that ideal. *Temperance*, the exercise of self-control, is the last of the five virtues. Navigating the tortuous gray areas of ethical behavior and reconciling the different expectations of stakeholders requires a certain amount of self-discipline. As shown earlier, an ethics officer’s job is unstructured. The virtue of self-control should clearly be an asset in that sort of role. Individuals with self-discipline should be able to deal with most of the role conflicts discussed earlier.

Mendonca (2001) proposed that moral leaders tend to be resourceful managers because the practice of the five virtues allows them to incorporate moral principles in their behavior. He suggests that moral leaders are more goal-directed, possess greater analytical orientation and tend to assess situations carefully before making decisions. Such individuals also persevere more in the face of problems and have greater emotional equanimity, or an ability to keep their emotions under control. Mendonca also notes that moral leaders “exercise greater restraint and discipline in order that

irrational expressions of emotions does not cloud their judgment and prevent them from viewing persons, things, and events in their proper perspective” (p. 271). These qualities should positively affect role performance of ethics officers. High moral character should reduce the nature of person-role conflict, or conflict that rises out of clashes between the personal values of the ethics officer and their role expectations. The theory and discussion is the basis for the following proposition:

Proposition 4

The probability of an ethics officer’s effectiveness increases with their level of moral development, such that the higher the moral character of an ethics officer, the higher his or her effectiveness.

Individual orientation and leadership behavior

Another personality dimension under consideration in this study is individual personality orientation and how it relates to leadership behavior. Ethics officers are expected to use influence tactics as a strategy for ethical leadership. Therefore, individuals more disposed to using such influence tactics, as part of their leadership style, should be effective in the role.

Management research provides some preliminary evidence to show that individual characteristics predict behavior, including leadership, in organizations (Lord et al., 1986). While the empirical evidence linking personality and leadership behavior remains mixed at best (see, e.g. Furnham and Strinfield, 1993), there is some increasing evidence to suggest that certain personality differences in leaders may actually result in the type of leadership style they use (Kuhnert and Russell, 1990). For example, Howell and Higgins (1990) have linked individual orientation to transformational leadership styles among champions of technological innovation. Church and Waclawski (1998) have also found that personality characteristics predict transformational leadership styles.

Research on leadership theory has identified transformational leadership, a style of leadership that uses influence tactics to accomplish goals (Bass, 1985). This style of leadership seems particularly suited to ethical leadership. A transformational leader uses influencing strategies to transform follower’s

self-interest into collective concerns. Transformational leaders are also known to use influence to develop collective commitment to ethical integrity. Burns (1978, p. 4) observes that transformational leadership is “moral in that it raises the level of human conduct and ethical aspirations of both leader and the led.” Transformational leaders also use their ability to articulate a captivating vision, inspire others, and encourage higher order effort on the path of followers (Bass, 1985). These characteristics are consistent with the role expectations of ethics officers.

Individual ability to use influence and persuasion should positively affect the role performance of an ethics officer. Kanungo and Mendonca (1996) have shown that transformational leadership is very useful in situations that are ill structured and value-laden. As a champion, cheerleader or custodian for integrity, an ethics officer will benefit from an ability to use influence tactics. These orientations should be particularly useful for the task performance of an ethics officer because the research evidence shows that individual differences are most predictive of behavior when environmental conditions are unstructured or weak (Howell and Higgins, 1990). Porter et al. (1981) have also shown that individuals with personality characteristics such as persuasiveness, persistence, and risk-seeking propensity tend to use influencing activity more often. More importantly, there is some evidence to predict that individuals with certain personality characteristics and orientations are better at transformational leadership (Bass, 1985). Earlier descriptions show that ethics officers deal with unstructured situations. An ethics officer with an ability to influence others will be more effective than those without this quality. Such individuals should be able to develop a persuasive argument to employees about the merits of ethical behavior. In summary, one should expect ethics officers with personal characteristics linked to transformational ability to be more effective than those without those characteristics. More formally, it is proposed that,

Proposition 5

The probability of an ethics officer’s effectiveness increases with their influencing ability, such that the greater the influencing ability of an ethics officer, the greater his or her effectiveness.

Individual competencies and role performance

Technical and business knowledge

Technical and business knowledge are two important individual-level competencies considered in this research. Technical knowledge refers to job specific knowledge. Knowledge of the relevant laws affecting ethical performance, a form of job-related knowledge, can be helpful to performance. Ferrell et al. (2005) observe that regulations that govern business behavior fall into five groups.

Regulation of competition

These are laws passed to prevent the restriction of fair competition. The Sherman Antitrust Act of 1890 is perhaps the most famous one. The Act prohibited monopolies. The Sherman Act remained a force until some weakening during the presidency of Ronald Reagan. A more recent law regulating competition is the 1998 Digital Millennium Copyright Act. The Act refines copyright laws to protect digital versions of copyrighted material, including music and movies.

Laws protecting consumers

These laws require businesses to provide accurate information about their products and services. The Federal Trade Commission’s Bureau of Consumer Protection has oversight for enforcing consumer protection.

Laws promoting equity and safety

These are laws promoting equity in the workplace. The Civil Rights Act created The Equal Employment Opportunity Commission. The Commission helps businesses design affirmative action programs. The Americans with Disabilities Act of 1990 is one of the more recent equity laws.

Laws protecting the environment

These laws are designed in response to concerns over the impact of business activity on the natural environment. The Clean Air Act 1970 is one example of such a law. Ethics officers need to be familiar with the provisions of the different laws. However, their relevance to the individual firm may depend on the specific industry in which the firm is. For example,

petroleum and chemical firms may be more concerned with laws protecting the environment than other laws. The category of laws that directly encourage ethical conduct may be of greater interest to ethics officer than other laws. The most important of these are the 1991 federal sentencing guidelines for organizations (FSGO) and the SOX Act.

The federal sentencing guidelines for organizations (FSGO)

The U.S. Congress passed the FSGO to create an incentive for organizations to develop and implement programs designed to foster ethical and legal compliance. Firms that demonstrate a commitment to ethical conduct through the management of ethics programs may be subject to reduced penalties in the event of employee misconduct.

Sarbanes-Oxley Act (SOX)

The SOX Act established a system of federal oversight of corporate accounting practices. Beyond that, some of its key provisions redefine corporate governance. For example, the Act mandates a code of ethics for senior financial officers, requires financial securities analysts to certify that their recommendations are based on objective reports. It also establishes specific penalties for certain types of corporate misconduct. Although a detailed discussion of the SOX Act is beyond the scope of this paper, it is clearly one law that provides an ethics officer key guidelines.

Another important type of competence required in an ethics officer's role is knowledge of the firm's business, products and industry characteristics. This is business knowledge. Prior research in executive performance has identified a thorough understanding of the business environment (business knowledge) as a key factor for executive success (Spreitzer et al., 1997). Business knowledge includes three things: individual task performance competence, broad knowledge about the industry and company, including knowledge about the company's products, markets and policies (Woodruffe, 1993). An ethics officer with good business knowledge will have a clear understanding of the nature of challenges that their firm faces. As DiPiazza (2001, p. 715) the CEO of PwC notes, "An ethics officer has to be well connected. They have to be familiar with what we do for a living."

Technical competence and business knowledge of an ethics officer should affect their performance for at least two reasons. First, competence on job-related tasks will reduce the task complexity of the position. A technically competent ethics officer will be able to know what sort of information they need to seek, where to look for information and interpret issues in their proper light. Second, an ethics officer who has clear understanding of the nature of a firm's business and environment will be in a better position to understand the complex requirements of the different stakeholders and subsystems they have to deal with. Industry standards, including regulatory provisions that are specific to the firm's business, put special demands on the firm. For example, a firm in the chemical industry may be more concerned about EPA standards than other regulatory legislation. This means that an ethics officer working in that industry needs a broad understanding of the chemical industry as a whole.

An ethics officer who possesses task-relevant knowledge should experience less task complexity and role stress and that should positively affect their performance (March and Simon, 1958). Management research has shown that technical knowledge directly influences managerial role performance (McCall, 1994). In summary, business knowledge and technical competence should help to reduce a certain amount of role ambiguity associated with the role and positively affect role performance. The preceding discussion is the basis for the following proposition:

Proposition 6

The probability of an ethics officer's effectiveness increases with their level of technical and business knowledge, such that the higher the technical and business knowledge, the higher their effectiveness.

Organizational factors

Figure 1 identified a number of situational and organizational factors that can buffer an ethics officer against the challenges of the role. Factors considered include recruitment source, including the clarity of information they got about the job prior to their hire, the position of the ethics officer in the managerial

hierarchy, their autonomy, and the ethical climate of the organization they work in may all affect their effectiveness.

Recruitment and selection of ethics officers

Another factor linked to ethics officer effectiveness is their recruitment. Recruitment research has shown that how organizations handle the recruitment of an ethics officer may have some effect on their subsequent job performance (Caldwell and O'Reilly, 1985; Louis, 1980; Wanous and Colella, 1989). Two key issues, the recruitment source and the management of the selection process, appear important.

First, the organization faces the choice of either hiring someone from within or from outside the organization. An individual hired from outside can bring a fresh perspective to the position and the firm may benefit from outside expertise and experience. However, there are at least two key challenges facing a person hired from outside the firm. First, current employees may consider such an individual an "outsider" who needs some time to understand how the organization works and win acceptance. Second, an outsider's performance may suffer temporarily during their learning period unless this individual is able to demonstrate leadership immediately. To the contrary, an individual hired from inside the organization may already have a good understanding of the culture and policies of the firm. However, an insider may have some liabilities. First, firms normally socialize their employees into specific ways of behavior that may not necessarily be conducive to managing an ethical program, especially if such an effort is new. Second, and more importantly, stakeholders may identify an insider as part of the problem, not a solution to the problem. This may especially be the case where there has been instances of ethical violations in the organization before. It appears that hiring from outside would be a preferred option since the neutrality of such an appointee would be an asset. Outsiders are more likely to appear neutral than insiders, because in some sense, the credibility of insiders may be in doubt, *ab initio*. For example, the International Monetary Fund (IMF) specifically requires that its ethics officers will not have had any prior employ-

ment with organization, perhaps as a way of maintaining their neutrality (<http://www.imf.org>).

The second and related factor to consider is how the firm manages the pre-selection process. Evidence from prior organizational research has shown that it is important to offer a realistic description of the job responsibilities to prospective hires. New hires face uncertainty and surprise (Wanous and Colella, 1989). Giving realistic job descriptions to potential hires means they may adjust better to the role, and experience less role stress. Management research has shown that prospective hires given realistic job previews and leads to higher job performance, lower levels of attrition from the recruitment process, and voluntary turnover (Louis, 1980; Caldwell and O'Reilly, 1985). Since ethics officers face considerable role stress, giving as much specific and accurate information about the job as possible prior to hire should be helpful to a prospective hire and help their subsequent role performance (Barber and Roehling, 1993). In summary, whether firms hire an ethics officer from within a firm or from outside the firm may affect their effectiveness. The prediction is that those hired from outside may have some advantage over internal hires. In addition, providing accurate information about expectations to prospective hires will reduce role ambiguity and help them adjust faster to the position once hired. The research and discussion is the basis for the following propositions:

Proposition 7

The probability of an ethics officer's effectiveness relates to their source of recruitment and increases directly with the clarity of their job preview.

Organizational hierarchy of ethics officers

The organizational hierarchy of an ethics officer is another factor considered in this research. Ethics officers must have appropriate organizational status to be effective (Izraeli and BarNir, 1998). Therefore, how a firm determines the organizational status of an ethics officer is important. The key issue here may be whether an ethics officer is an integral part of the management team proper or not. There are at least

two reasons why an ethics officer should be independent of the management team.

First, independence from the management team will assure their neutrality. For example, it may be difficult for an ethics officer to challenge management behavior if they are a direct part of the management team. As DiPiazza (2001, p. 714) the CEO of PwC puts it, "The ethics officer is part of the governance process. She has a direct reporting line to our Board. She plays a critical role in most of our difficult people decisions. So she is part of our leadership – she's not part of our management." This is important and may be illustrative of what organizations should do.

Second, and related, placing ethics officers out of the management team may be useful for their performance because both groups may actually think differently about the means and ends of ethical programs. Some important preliminary findings provide further evidence for separating the two positions. Trevino et al. (2000) come to a number of rather interesting conclusions about perceptual differences between senior executives and ethics officers on the nature of ethical leadership. First, they note that senior executives and ethics officers differ in their perceptions of what is important in ethical leadership. The authors note that unlike senior managers, ethics officers had a greater appreciation of the social context of ethical decisions. They conclude that both senior managers and ethics officers "operate within a different zone of reality." Second, they found that ethics officer's perceptions are closer to employee's social reality than that of senior executives are. While ethics officers see ethical leadership in terms of decision-making processes, senior executives see ethical leadership "as a function of choices and decisions." Third, the authors found that while ethics officers are familiar with the work of the rank-and-file, senior management had mindsets far removed from ordinary employees. Worst yet, while senior management tended to have short-term utilitarian view of management, ethics officers had both a short-term and long-term perspective. Finally, unlike senior management, ethics officers were concerned about the means, not just the outcome. These findings show that there are serious perceptual differences between the two groups. These differences have at least two important implications for the role performance of ethics officers.

First, such perceptual differences can be a source of conflict between senior executives and ethics officers. The conflict literature suggests that differences in values, including perceptual and attitudinal differences can be a source of conflict (Deustsch, 1994). This means that both groups can work at cross-purposes because conflict, by nature, implies that one group impedes the goal performance of the other group.

The second and related implication is that perceptual incongruence on the nature of ethical issues may lead to goal incompatibility between ethics officers and senior executives. A lack of agreement on what the goals of an ethical program ought to be will seriously compromise the effectiveness of ethics officers. Such a situation will increase inter-sender conflict or conflict that arises when there are conflicting expectations and conflict can cause role stress, dissatisfaction and low productivity (Rizzo et al., 1970). In some respects, one primary challenge facing an ethics officer may be how to bridge this perceptual divide. Chances are that ethics officers will be in a better position to succeed working outside of the management team than when they are within. This may be so because being directly involved with management opens up the possibilities of constant direct confrontation with senior executives. The research and discussion is the basis for the following proposition,

Proposition 8

The probability of an ethics officer's effectiveness relates to their position in the managerial hierarchy, such that the more independent ethics officers are of the senior management team, the greater their effectiveness.

Autonomy and managerial status

The independence or autonomy of the ethics officer is important for their performance. Autonomy refers to the degree to which an ethics officer can use personal discretion in decision-making. This independence is important especially since the job responsibilities of ethics officers include overseeing and investigating wrongdoing, including managerial

indiscretion. DiPiazza (2001, p. 714), notes that the “ethics function must be independent of management, independent of our business operations. It must be in a unique position to offer objective council on some of our toughest issues. It has to operate across all our lines of service—no boundaries.” A good example of ethics officer autonomy may be exemplified by the IMF (<http://www.imf.org>). The IMF allows its ethics officers to be independent of any official, department, office, bureau or other organizational entity except when their contract of employment explicitly prohibits it. The IMF empowers its ethics officers to have direct access to all staff members, contractual employees and vendors as part of their legitimate responsibilities.

Although autonomy is important, preliminary research evidence suggests that some ethics officers may not have autonomy, and by extension power. A membership study conducted in 2000 by the EOA (cited in Barry, 2002) showed that most ethics officers do not have significant power. The results of the study show that ethics officers do not have substantial reporting relationships to the CEO or the board of directors. The study reported that 27% of the respondents reported to the CEO/President/Chair, 21% reported to the general counsel, and 21% to an executive/senior vice president. On working with the board of directors, 4% said they meet with the board “on a regular and frequent basis” (more than four times a year). Another 30% meet with the board on a “regular but infrequent basis” (four times per year or less). About a quarter (23%) reported that the board is “accessible when needed.” The majority, 61% reported that their boards are “very supportive” and about 1% indicate that their board was “mildly unsupportive.” Ethics officer autonomy should positively affect their role performance for at least two reasons.

First, autonomy assures that ethics officers will be able to perform their roles effectively without fear of interference. This is important because being responsible for investigative oversight may put an ethics officer on a direct collision course with other stakeholders. Second, having managerial autonomy may be one indication of the status an ethics officer has. An ethics officer who has autonomy and status will have legitimate power (Handy, 1993). Legitimate power arises from the follower’s belief that a leader has the legitimate right and/or authority to

influence. This is important given that ethics officers may sometimes be viewed in a negative light to start with.

According to Handy (1993), the effective use of legitimate power is dependent on the perceived value given to that role within the organization. This implies that ethics officers seen as having no or low status will have little power. Nevertheless, a lack of legitimate power may adversely affect the effectiveness of an ethics officer because power can be a useful resource for leadership especially in complex situations (Handy, 1993; Northhouse, 2001). Ethics officers lack coercive and reward power by virtue of the nature of role they occupy. The former refers to the ability to control sanctions and the later the ability to reward (Handy, 1993). Therefore, their lack of legitimate power should be particularly detrimental to their leadership effectiveness. How stakeholders perceive an ethics officer in terms of their status within the organization affects their power because legitimate power is often socially constructed (Hatch, 1997). Autonomy should also reduce the level of role conflict and ambiguity that ethics officers face (Kahn et al., 1964; Rizzo et al., 1970) as well as increase their legitimate power and leadership capacity. The research and discussion is the basis for the following proposition,

Proposition 9

The probability of an ethics officer’s effectiveness increases with their level of autonomy, such that the greater the autonomy of the ethics officer, the greater their effectiveness.

Ethical climate

Another organizational characteristic considered in this study is the ethical climate. Researchers have long speculated that organizational characteristics are important determinants of the types of choices, including moral ones, which employees make. Sutherland (1949) first observed that existing organizational norms strongly influence legal compliance. Other researchers have built on that idea and established that organizational norms do influence ethical behavior (Victor and Cullen, 1988).

Victor and Cullen (1988, p. 101) define ethical work climate as “the prevailing employee perceptions of typical organizational practices and procedures that have ethical content.” The authors propose a two-dimensional typology of ethical climates. The first dimension, based on Kohlberg’s (1981) theory of moral development addresses the ethical criteria by which organizational decisions are made. The second dimension of Victor and Cullen’s (1988) framework reflects the locus of analysis or the referent group in whose interest one is supposed to act when confronting an ethical issue. The authors suggest that in ethical settings, actors can act based on their personal interest, the interest of the organization or larger societal interest. It is the responsibility of organizational leaders to create an ethical climate. Prior research has shown that managers play an important role in the sort of ethical environment that exists in organizations (Kanungo, 2001; Trevino et al., 2000). We also know that employees and stakeholders look up to top management to set the ethical tone of their organizations (Lewin and Stephen, 1994).

Ethical climates can be either strong or weak. A strong ethical climate promotes moral behavior. However, the existence of a weak ethical climate does not necessarily suggest that one will see greater ethical misconduct in a firm. The organizational context in which an ethics officer operates can have an important effect on his or her performance.

The nature of an organization’s environment that reflects on ethical conduct is the organizational ethical work climate. An environment with a strong ethical climate should help the job performance of an ethics officer because employees may share values that are consistent with ethical behavior. This may be true because a strong ethical climate is indicative of some organization-wide commitment to ethics. For example, employees in a firm with a strong ethical climate would tend to have a more constructive view of the role of an ethics officer. Employees who have a pre-existing commitment to integrity would be more likely to view an ethics officer as an additional instrument for managing ethical behavior, rather than an intrusion. Although the research evidence on the relationship between ethical climate and employee conduct remains mixed, some of that evidence suggests that a strong ethical climate, especially one that cuts across all work groups, has a positive influence on employee behavior and reduces the seriousness of

ethical violations (Bartels et al., 1998). The research and discussion is the basis for the following proposition,

Proposition 10

The probability of an ethics officer’s effectiveness increases with the level of ethical climate of a firm, such that the stronger the ethical climate, the greater their role effectiveness.

Conclusions and implications

The responsibility of managing the ethical infrastructure in an organization is increasingly falling on ethics officers. Whether ethics officers are successful or not may depend on a number of factors. The framework presented here focused on key personal, situational, and organizational factors to explain role performance of ethics officers. This paper extends existing research in three ways. First, it focuses on identifying individuals most suitable for the role. Second, it brings into focus key situational and organizational context factors important for role performance. This is important given that context has an important effect on role performance. Finally, the research offers important guidelines on how to increase performance in the role.

Other important management issues arise from this research. A transcript copy of a recent conversation this author had with a middle-level manager from a well-known Fortune 500 company demonstrates serious challenges facing ethics officers:

Manager: “My Company just appointed this guy as an ethics officer.”

Question: “So what is his role?”

Manager: “I do not know, but everyone says he is just there to find trouble for people. As far as I am concerned, he is a dead duck.”

Question: “Why do you say that?”

Manager: “Because everybody knows what he will be up to and they will just hide stuff from him if they have to.”

Question: “Do other people feel the same way you do?”

Manager: “Of course, that is what all the guys in

my work team are saying. I know most people feel the same way.”

The above indicates what firms should avoid when appointing an ethics officer. Organizations need to develop a method for introducing ethics officers, in order to prepare employees before an individual assumes this position.

There currently exists very little research on ethics officers. However, the increasing importance of the role should spur additional research on the topic and this research highlights some possible areas requiring our immediate research attention. First, the propositional inventory generated here awaits empirical verification. Second, research is needed to understand important performance issues such as how the perceptual divide between ethics officers and senior executives can be bridged. The discussion has shown that ethics officers seem to have a more realistic view of ethical issues than senior executives do and so it may be incumbent upon them to try to persuade senior executives to change their viewpoint. This will require tact and diplomacy. The literature on persuasion provides some insight on how this may be accomplished (see, e.g. Chambliss and Garner, 1996; Murphy and Alexander, 2004). Persuasion is the process of altering an individual's perspective by changing the knowledge, beliefs or interests that underlie that perspective (Miller, 1980). Persuasion seeks to counter current beliefs and present new ones (Chambliss and Garner, 1996). As a relatively new phenomenon, qualitative approaches may prove useful for developing theory on the phenomenon.

Implications for executives

Firms creating a position of an ethics officer can benefit from some of the findings from this research. First, it is important to have a clear, and perhaps a narrower, job description of the ethics officer to reduce role ambiguity and role conflict. The job responsibilities of the position provided by the EOA and those gleaned from corporate websites appear rather broad. Beyond having global responsibility for developing and directing the organization's ethics and providing leadership oversight, the ethics officer assumes accountability for all program activities relating to ethical conduct and corporate social responsibility.

Such a broad role creates several problems for ethics officers. Organizations may need to reduce the scope of job responsibilities for ethics officers. For example, it should be possible to assign the corporate social responsibility and compliance dimensions of the job to other departments and corporate officers. In fact, the compliance role has come into sharp focus with the passing of the SOX Act and some organizations are creating a dedicated compliance officer position, in addition to an ethics officer position. An additional position of a compliance office means additional labor costs. However, for larger organizations that are able to afford it, it may actually be worth the cost to hire a compliance officer in addition to an ethics officer. This should reduce the job scope of an ethics officer, reduce their job complexity, and free them up so that they can concentrate on providing ethical leadership. A narrower and clearer job description should help to reduce role ambiguity, role stress and increase effectiveness, when it comes to evaluating the contributions of the ethics officer to organizational performance because of the low task visibility of the role.

Second, the discussion suggests that the sort of individual appointed to the position may help performance in the role. This is important given that this is a relatively new position and there may be a dearth of experienced applicants. An alternative is to screen applicants and select individuals with desired characteristics. Prospective hires should have the personal characteristics identified in this paper. The selection process should include the use of questionnaires or batteries of personality tests. For example, organizations can assess an individual's influencing disposition with Bass's (1985) Multifactor Leadership Questionnaire (Form 5-Self). It is also possible to measure the LOC and tolerance of ambiguity of prospective hires with survey instruments. Recruitment officers can measure an applicant's technical and business knowledge with a survey instrument or through interviews. Within limits, the moral development of prospective hires can also be determined at the time of hire. Existing personality and value-based assessment tools may be appropriate for ascertaining an applicant's moral character. Instruments such as the commercially available Myers-Briggs Type Indicator may be used to gauge personality variables, including certain forms of value orientations.

Third, considering that this is a relatively new position, training programs should be available to ethics officers. As a relatively new position, there may be a lack of existing management development programs for ethics officers. Both task and business knowledge is important as evidenced by the discussion. It may also be possible to improve an individuals' ability to work in unstructured environments. When firms appoint individuals from within their firms, it may become necessary to create the opportunities for such individuals to expand their knowledge base.

Fourth, firms need to create a supporting environment for the ethics officer to be effective. The ethics officer may be the cheerleader and champion, but their presence cannot absolve organizational leaders from the responsibility of setting the ethical tone. The job of ethical leadership remains primarily the responsibility of the top management and management must demonstrate unwavering commitment to ethical integrity as part of firms' overall ethical infrastructure. This includes clearly explaining what the role of ethics officers are to eliminate the poor impressions such as indicated earlier in the study.

Regrettably, some preliminary evidence suggests that management support for ethics officers have been lacking in some cases. For example, Barry (2002) lists a lack of ethics officer support as one reason why ethics and compliance programs fail in organizations. Top management must recognize the legitimacy and value of the ethics officer. This means that when necessary, top management must submit itself to the jurisdiction of the ethics officer. At the very least, they must respect the decision of the ethics officer to go above management to the board when they have legitimate reasons to do so. Mr. DiPiazza, the CEO of PwC reports an example of this sort of behavior. He described how he actively used counsel of his ethics officer in dealing with a potentially explosive situation. He reported that he actively consulted with his ethics officer and sought her counsel on the issue. He noted, "She not only acted as my alter ego, she acted as my counselor," (DiPiazza, 2001, p. 714).

Finally, ethics officers need to realize that navigating the many subsystems and role responsibilities will be challenging. Success in the role may require great political skills in addition to the competencies

and business knowledge discussed in the paper. Other general management skills would be useful to the role. For example, the EOA suggests that such individuals must be strong communicators, be objective and thoughtful. In addition, ethics officers should have the ability to assimilate information relating to complex issues, possess common sense, and solid management skills. These general management skills will help to reduce role conflict and enhance the ability of the ethics officer to perform well.

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