#### Susan Bounds

Director – Corporate Compliance AT&T



## Who we train: 250,000+

- Technicians
- Retail store employees
- Call center employees
- Labs
- Managers, officers
- Worldwide



#### How we trained:

- Traditional on-line format
- Scheduled blocks of time
- Mandatory courses every year
- Process for non-automated trainees



## **Experiment in Video:**

- Officers
- Frontline
- Leadership
- Specialized
- Useful elsewhere



## **Coming Next:**

- Avatars
- More Specialization
- Mobile Devices
- Downtime



#### Ken Jones

Corporate Vice President Chief Compliance Officer Huron Consulting Group



- CCO at Huron since 2009
- Previously:
  - CCO and Director of Training and Professional Development-Stockamp&Associates
  - President/CEO of post-acute care operating division of Legacy Health System, Portland Oregon
  - Director of Management Services and Budget Officer, City of Portland, Oregon

## Huron Consulting Group

- Provides business consulting services in healthcare, higher education, legal, and financial services
- Founded in 2002 with 200 employees
- Growth organically and through acquisition
- Publically traded (HURN)
- FY 2011 Revenue \$606.3 M
- Currently has 2,000+ employees
- Offices in the U.S., Europe, the Middle East, and India

## Huron Corporate Values

- Corporate Values:
  - Integrity, pursuit of excellence, accountability, collaboration, passion
  - Value: Integrity
    - Definition We do the right thing regardless of the consequences
      - Behaviors-
      - Be genuine, say what you mean and mean what you say
      - Build trust by always exhibiting honesty and respect
      - Give credit where credit is due
      - Speak up and take positive action when something appears wrong
      - Be transparent about individual and collective successes and failures

### New Employees Basics: Ethical Check Questions

#### **Ethical Check Questions**

#### 1. Is it legal?

Consider laws, regulations, Huron policies

#### 2. Is it balanced? Does it promote win-win outcomes?

- Look at all implications of decision
- Consider impact on company, clients, communities, stakeholders
- Should I obtain additional advice about the issue? (e.g. Helpline)

#### 3. How would the decision make me feel?

- Would decision give me an advantage to which I'm not entitled or which I shouldn't accept?
- Am I comfortable sharing the issue and decision with others?
- What if decision were made public?

#### New Leaders: Understanding How Ethical Decisions Are Made

#### Four Approaches to Ethical Decision-Making

#### 1. Principles Approach

Base decisions on certain ethical principles in every case without exception

#### 2. Consequence

 Base decisions on whatever action will achieve the best outcome

#### 3. Virtue/Character

 Base decisions on the individual's moral character and ability to apply principles uniquely to each specific situation

#### 4. Moral Sentiment

Base decisions on how you and/or others feel about the decision

As discussed in Ethical Decision-Making by Jack Gilbert

## Advanced Leadership: Supporting an Ethical Culture

#### Lead by example

- Discuss ethical dilemmas that you've faced.
- Ask tough questions
- Be accountable

#### Embed ethical values in workplace discussions

- Emphasize and demonstrate that living our values trumps other priorities
- Ensure that work group is safe place to be heard. You can be faulted for NOT speaking up
- Guard against too aggressive work plans that could foster inappropriate compromises

#### Build ethical decision-making skills

- Address ethical conflicts by appealing to a shared sense of purpose/values
- Apply skills learned in coaching and giving feedback to address ethical dilemmas
- Anticipate dealing with rationalizations for questionable behavior, e.g. "Everyone does it."

## Continuing Learning and Evaluation

- Instructor-led training for new hires
- Instructor-led training for new directors and new managing directors
  - 1-3 days
  - Scenario based
  - Includes COO, CCO, VP-HR
  - Continuing cohort sessions at least quarterly for 1 year
- Corporate-wide mandatory online courses
- Operational audits of engagement team compliance
- Corporate ethical culture survey to assess perceptions of our ethical culture and track changes

Sandy Williams

Vice President of Ethics & Compliance; Chief Compliance Officer

American Electric Power



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## Effective Ethics Training; Year After Year

#### **About AEP**

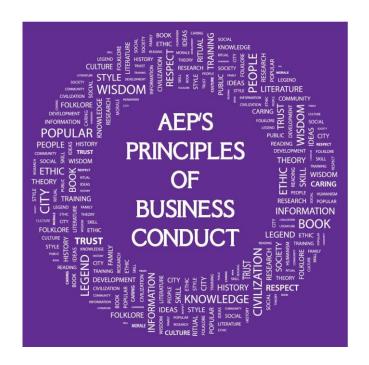
- President and CEO Nick Akins
- Assets \$60.5 billion
- Employees 18,700
- U. S. Customers Approximately 5.3 million
- States served Arkansas, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, and West Virginia.
- Service Territory Approximately 200,000 square miles
- Miles of Transmission Lines Approximately 39,000
- Miles of Distribution Lines Approximately 216,000
- Generating Capacity Approximately 38,000 Megawatts



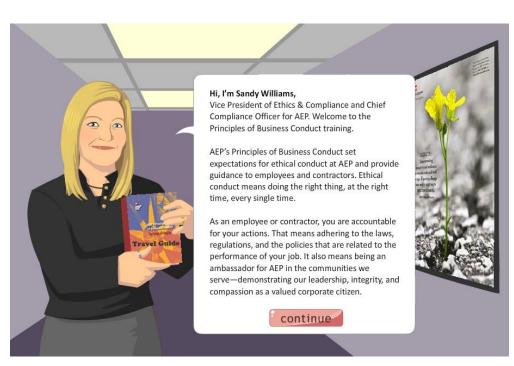
## Chief Compliance Officer...

- Report directly to CEO
- Report to governance committee of the Board of Directors
- Office of Ethics & Compliance: Four investigators and one administrative associate
- Responsible for ethics communications and Corporate Code of Conduct
- Responsible for investigation of calls on AEP Concerns Line
  - Anonymous Hotline
  - Approximately 500 calls per year
  - Available via toll-free telephone call or internet

## **Annual Ethics Training**



Principles of Business Conduct



**On-line Annual Training** 

# Emphasis on Constant Training via Communication using Ask Sandy Brand

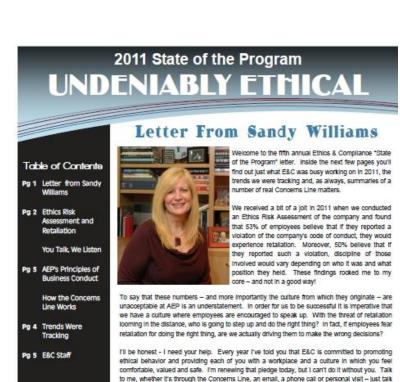


- Ask Sandy Q&A column on company intranet site
- Ask Sandy Live IM chat sessions
- Ask Sandy Twitter Account
- Ask Sandy Advice Line (in development)
- Ask Sandy Live Webcasts

# Emphasis on Constant Training through Communication

- Ethics & Compliance annual 'State of the Program' letter
- Ethics Panel
- Scrubbed cases on ethics & compliance intranet site





to me. Together, we can figure this out.

Ethics & Compliance

"UNDENIABLY ETHICAL"

Canlact the AEP Concerns Une 1-800-750-5001

## Emphasis on Constant Training through Communication

- Ms. Perception blog
- Reflections on ethics
- Ethics posters
- Site visits/presentations

### Ms. Perception, with Sandy

Interact with Sandy Williams on ethics at AEP.

**REFLECTIONS ON ETMICS**Video Series

