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# The Effectiveness of the Ethics Officer's Influence: An Interpretive Phenomenological Analysis Exploration

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Walden University
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Abstract

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by

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MPhil, Walden University, 2019

MA, Ball State University, 1994

BS, Ball State University, 1984

Dissertation Submitted in Partial Fulfillment

of the Requirements for the Degree of

Doctor of Philosophy

Management

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**Abstract**

The position of ethics officer was created to watch over corporate behavior. However, scandals have continued to demonstrate unethical leadership involving government officials, sports heroes, religious organizations, and corporate leaders. The research problem was that despite the adoption of corporate ethics programs and government oversight, there is a lack of understanding of ethics officers' experiences, perceptions of effectiveness, and whether they effectively influence executive-level ethical conduct. The purpose of this qualitative phenomenological study was to explore the lived experiences of ethics officers regarding their interactions with executives. Shaped by Brown and Treviño's ethical leadership theory, the research question concerned the perceptions of the ethics officers' experiences as stewards to influence executive-level ethical behavior. Data were collected through semi-structured interviews with eight North American corporate and government ethics officers. Analysis of the data transformed emergent statements into categories and then themes. Three key findings emerged: (a) ethics officers perceive their interaction with executives to be effective; (b) guidelines, training, and reporting of inquiries and incidents are the foundation of their influence; and (c) the role is defined consistently across corporate and government programs. This research may lead to positive social change if leaders adopt a blend of compliance and value-based approaches, increase their ethical awareness, and improve ethical decision-making. Broadened ethics awareness would filter into local communities, improve leadership processes, change training approaches, and evolve executive hiring practices.

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**Dedication**

This study is dedicated to my late husband, David Douthitt, who sacrificed so much over the years to make this journey possible. He gave his love, support, encouragement, and our time together to ensure I made progress. While he is not here on earth to celebrate the completion of this Ph.D. program, I know he is here in spirit and in my heart, celebrating this accomplishment. Also, I dedicate this study to my grandmother, Norma Wardlow, and my mother, Carol Murdock, who taught me to be a strong woman and never quit until the task was done. They showed me how to overcome obstacles, big or small, and believe I could accomplish anything. Although my grandmother passed before seeing me finish, I can feel her love and pride in my soul.

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Chapter 1: Introduction to the Study

According to Voegtlin et al. (2011), leaders (practice) and scholars (theory) are struggling to reframe ethical leadership and define corporate compliance. Examples of unethical leadership have occurred among government officials, sports heroes, religious organizations, and corporate leaders. Ambrose et al. (2014) found that understanding leadership ethics is a critical issue influencing the social view of corporate reputations and economic stability, while ethical scandals continue to plague organizations of all types. The ethics officer (EO) role was created to watch over corporate action (Morf et al., 1999; Weber, 2015). Nonetheless, scandals have continued to occur, accentuating the growing display of unethical leadership. According to Gnazzo (2011), this trend is partly due to the limited understanding of EO effectiveness.

In my research, I extend the body of knowledge about ethical leadership by exploring the EO role, focusing on the effectiveness of steering the ethical behavior of corporate executive-level leaders. A deeper understanding of the EO role, the subject of this study, could reduce unethical behavior, enhance ethics training programs, and improve the sustainability of ethical climates. Such improvement could add value and strengthen the role's legitimacy in influencing ethical leadership behavior (Treviño, den Nieuwenboer, et al., 2014).

In Chapter 1, I introduce the background for this study, the problem statement, the purpose, and the research question. I summarize my conceptual framework grounded in ethical leadership theories. I then discuss the nature of this study, definitions, scope and

delimitations, assumptions, and limitations. Lastly, I illuminate this study's significance for practice and theory before briefly summarizing the chapter.

**Background of the Study**

As discussed more thoroughly in Chapter 2, studies on corporate ethics emerged in the literature in the 1980s to enhance the understanding of leadership behaviors associated with ethical debacles (Treviño, den Nieuwenboer, & Kish-Gephart, 2014). Corporate ethical effectiveness was thought to be measured through deflection, detection, and punishment following the occurrence of misconduct by those who straddle the line between right and wrong, where misconduct is the clash of legal norms and moral codes. Carroll (1991) illuminated the existence of an ethics tug of war in which executives struggle with the morality of social responsibility, economic profitability, and ethical norms of fairness and justice within the guidelines of existing legal obligations. Resick et al. (2006) stressed that corporate culture shapes the ethical value placed on behavior to mold leaders' perceptions and bestow ethical effectiveness throughout an organization. According to Ferrell et al. (1998), ethical conduct is directly connected to leadership's commitment to formal accountability, which comes from establishing an effective ethics and compliance program.

The early focus of the literature was on the components of corporate ethics and compliance programs and the EO's role as a component of the overall program. Weaver et al. (1999) stated that the early adoption of compliance programs was for show, and few managed ethical practices to ensure alignment with policies. Weaver et al. stressed the need to understand further the relationships between the characteristics of ethics

programs, employee conduct, and methods used to view the interactions between social values and compliance orientations. Stevens (2008) focused on the effectiveness of the code of ethics, Weber (2015) focused on the quality of ethics training programs, and Schwartz (2013) focused on the ability to build ethical cultures. Weber and Wasieleski (2013) discovered many inconsistencies in corporate ethics and compliance methods, which made these methods too generic to help change corporate culture.

Treviño, den Nieuwenboer, et al. (2014) said that the EO role remains an area where little scholarly knowledge exists about the position's experiences and effectiveness. Only narrowly mentioned in the literature are methods used to measure the potential influence of the role on executive leadership's behavior. Mazur's (2017) work focused on gaining insight into the challenges EOs face and the role's effectiveness as a critical connection between executive leadership and the corporate ethical culture. Sampson (2016) reinforced that many in the EO role struggle with balancing legal compliance and ethics and embodying the moralities and legalities depending on an organization's ethical culture.

Research is missing from the literature regarding the effectiveness of the EO as a stand-alone component rather than part of the compliance program and insight into the perceptions of those in the position. The struggle continues between balancing ethical behaviors and legal and regulatory oversite (Mazur, 2017). Further, EO effectiveness continues to be hard to measure when balancing ethical conduct and corporate revenues (Forbes Insights, 2019). There is a gap in the research regarding ethical leadership strategies used by EOs to influence executive-level leaders' ethical behavior. My study

was needed to close that gap: to provide insights to help EOs improve leadership structures and organizational ethical cultures; to institute ethics training programs (both within academia and practice); to expand the tools available to help grow the EO influence and effectiveness at the senior-most levels; and to increase overall corporate profitability.

## Problem Statement

The management problem was that billions of dollars are depleted annually in the United States due to executives' unethical behavior and corporate scandals (DeConinck, 2015), affecting individuals, communities, and corporations. In 2020, LRN (an education company) found that only 53% of senior leaders at their organizations act when compliance failures occur. The same report noted that only 46% said their organization supported sanctions of senior executive misconduct penalties. In comparison, only 40% of the board of directors are likely to hold senior executives accountable for misconduct. Despite the amount spent on (a) ethics training programs, (b) corporate leadership development, (c) business model improvements, (d) applying political pressures, (e) imposing governmental regulations, and (f) the creation of the EO role, corporate ethical misconduct continues at an alarming rate. However, there is a gap in ethical leadership research related to strategies used by EOs and their effectiveness as influencers of top leadership ethical behavior. Thus, my research problem was that despite adopting extensive corporate programs and abundant government oversight, there is a lack of knowledge and understanding of EOs' experiences, their perceptions of their effectiveness, and whether they effectively influence executive-level ethical conduct.

**Purpose of the Study**

The purpose of this qualitative interpretative phenomenological analysis (IPA) study was to explore the lived experiences of EOs regarding their interactions with executives. My goal was to evaluate EOs' perceptions of their effectiveness in influencing executives' ethical behavior within organizations operating in North America that have an established ethics and compliance program.

According to Mayoh and Onwuegbuzie (2015), interpretative phenomenology is used when a researcher seeks to gain a greater understanding of experiences from the consciousness of those living the experience. In this study, I explored the perceptions of those currently or previously in an EO role to extend the body of knowledge regarding their influence on executive ethical behavior within the corporate culture. Such insights may lead to recommendations that increase EOs' effectiveness, enhance corporate ethical culture, reshape executive ethical conduct, improve leadership processes, ethics training, and compliance programs, and sculpt executive selection and development programs.

The EO role has become the ethical heart of an organization, focused on more than avoiding legal repercussions (Sampson, 2016). A greater focus is now on the sustainability of organizational ethical cultures that support leaders morally doing the right thing. Research that aids EO effectiveness could favorably impact an organization's global performance and overall profitability (Adobor, 2019).

**Research Question**

The alignment of the research question with the problem statement was essential to ensure my research was focused on the literature gap and captured insight into the

reality of the EO role. My research question asked, How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? This research question was logically based on my research problem: There is a lack of knowledge and understanding of EOs' experiences, their perceptions of their effectiveness, and whether they effectively influence executive-level ethical conduct.

## Conceptual Framework

I explored ethical leadership approaches used to guide organization leaders from the lens of those currently serving or having served in the EO role to influence executive ethical behavior, corporate compliance programs, and adherence to regulatory requirements while ensuring profitable shareholder outcomes.

The conceptual framework for this study was Brown and Treviño's (2006) core principles of ethical leadership theory. Brown and Treviño contended that ethical leadership conduct is derived from a leader's characteristics such as trust and integrity, communication of ethical behavior through one's actions, and the perceptions of ethical status learned through an individual's social learning experiences. DeConinck (2015) said that ethical leadership models are based on the moral person and moral manager principles within a social learning context. Brown and Treviño posited that there are six core principles of ethical leadership. Those principles are trust, fairness, honesty, respect, integrity, and support.

Ethical leadership theory has been applied in many studies when researchers explored leadership strategies employed in various scenarios (Hansen et al., 2013). Those scenarios include how an executive's morality and character influence employee

commitment and establish the essence of right and wrong based on the benefit of the consequences of actions (Burnes & By, 2012). Gamez-Djokic and Molden (2016) developed an understanding of motivations based on the intentions of decisions that are focused on welfare-maximizing leadership actions. In other studies, researchers demonstrated that ethical leaders must be good role models motivated by altruistic moral principles and share a consistent balance between words and actions (see, for example, Tanner et al., 2010).

I applied ethical leadership theory to the development of my research protocols and data analysis to lead to insights that advance scholarly knowledge and improve the practical application of leadership concepts through a deeper understanding of the EO role. Further, recognizing emergent behaviors associated with the role's effectiveness could influence executive leaders' ethical conduct. I briefly touch on these principles in Chapter 1 and then explore each more deeply in Chapter 2.

## Nature of the Study

Quantitative methods, such as empiricism, focus on numerical accounts of variable relationships to describe trends and opinions. This quantifiable approach reflects a post-positivism ideology where scientists believe in getting it right or a sense of absolute. Although an undoubted truth can never be found, cause-and-effect scenarios found within the data and rational viewing of variables shape our knowledge (Creswell, 2009). According to Patton (2002), a quantitative study standardizes measurements, pushing findings into predetermined categories, allowing the generalization of numerical comparisons for large populations, and is dependent on instrument effectiveness. This

approach tests theory to explain answers, make predictions, or investigate variable correlations based on experimental impacts, while a qualitative approach often generates theories.

A quantitative research approach was not selected because I was not testing a theory nor assessing correlations between variables. The quantitative approach limits responses to predetermined categories through standardized questions administered to many participants (Patton, 2002). The quantitative approach would not have allowed me to explore participants' perceptions using open-ended interview questions.

Qualitative research methods explore a phenomenon from participants' perspectives using interviews and observations to formulate an inductive attitude toward an argument or theory (Astin & Long, 2009). The qualitative researcher is extensively involved in data collection as the primary instrument. The emphasis is on understanding the perspectives of others and their lived experiences, leading to an interrogation of those meanings and outcomes. According to Patton (2002), a qualitative study yields an in-depth breadth of knowledge about a small population, situation, or case scenario, dimensioning the generalization of findings.

Based on a review of the literature and definitions of the methods, I determined that a qualitative approach would be the best methodology for my study. Qualitative research allows a researcher to be close to the phenomenon and those involved to study the intricate aspects of the phenomenon without manipulating the outcomes. Astin and Long (2009) said that qualitative research emphasizes exploring and understanding participants' perspectives to explain the meaning of everyday events. I applied the IPA

approach defined by Smith et al. (2009) using a homogenous sample to study the perceptions of corporate EOs (past or present), focusing on their influence in shaping the ethical behavior of executive-level leaders. I sought to understand how those serving in the EO role make sense of their experiences, influence, and successes.

According to Alase (2017), the IPA approach is advantageous because it allows participants and researchers to develop a bonding relationship that could enhance the understanding of those experiencing the phenomenon. Mayoh and Onwuegbuzie (2015) added that the interpretative approach acknowledges researchers' subjective experiences and applies a joint view with the experience when interpreting meanings.

My plan, covered in greater detail in Chapter 3, was to expand on the body of knowledge using an IPA qualitative approach by conducting in-depth participant interviews with those who had actual experiences serving in the EO role across organizations operating in North America. Those participant responses were coded and analyzed to find descriptive patterns, commonalities, and anomalies. The phenomenon for this study was interpreting the meaning of the actual experiences of those who have served in the EO role and those aspects that affected the effectiveness of their position in influencing executive-level ethical behavior.

## Definitions

Listed in this section are the terms and definitions used in this study.

*Culpability Index:* A method used by the government to assign points numerically to assess the validity of a company's actions aligning with the U.S. Federal Sentencing Guidelines (FSG; Sampson, 2016).

*Ethical Leadership*: To act purposively within everyday conduct based on integrity, social standards, and moral fairness (Toor & Ofori, 2009).

*Ethics and Compliance Officers Association (ECOA)*: An organization established in 1992 as a non-profit 501(c)(6) association exclusively to propitiate the professionalism of the ethics functions (*Business Ethics and Compliance Timeline*, 2015). Later, the ECOA became the premier association for ethics and compliance officers when the FSG merged the ethics and compliance functions in the early 2000s.

*Ethics Officer (EO)*: A corporate position responsible for managing the ethics and compliance program while providing training, guidance, and oversight to leadership and the board of directors (Adobor, 2006). The literature uses the terms chief ethics and compliance officer, chief compliance officer, chief ethics officer, compliance officer, and ethics officer interchangeably in many instances. For this study, I use the EO abbreviation to represent these and other titles for those whose function is or previously was the responsibility of the corporate EO (regardless of their title) unless otherwise noted.

*Ethics Officers Association (EOA)*: A professional organization for ethics managers focused on programs to promote compliance and ethical conduct. Membership requirements include managers responsible for an organization's ethics program and who are members of an organization's upper level of management.

*Health Care Compliance Association (HCCA)*: A member-based organization established in 1996 that serves over 12,000 members dedicated to organizational cultures

of integrity within the healthcare compliance space (Health Care Compliance Association, 2023).

*Interpretative Phenomenological Analysis (IPA)*: A qualitative research approach spawning from the hermeneutic phenomenological theory used primarily for psychology and healthcare (Patel et al., 2015). The intent of this approach is to uncover the complexities of experiences and deeply understand the experiences of those who have experienced the phenomena.

*Sociology of Compliance (SOC):* The institutional analysis of the influence legal pressures has on organizations, illuminating vital professional roles and subjective interpretations of external regulations (Khaled & Gond, 2020).

*Society of Corporate Compliance and Ethics (SCCE):* A membership that includes attorneys and compliance professionals who provide insight into the corporate compliance space across all industries, helping each other solve legal issues and educating others on business ethics (Society of Corporate Compliance and Ethics, 2023).

*Stewardship*: Acting in the best interest of those who seek to attain organizational objectives and protect the company's wealth by building a strong relationship between organizational success and stakeholder satisfaction from within a service model (Davis et al., 1997).

*U.S. Federal Sentencing Guidelines for Organizations (FSG)*: Guidelines and policies established by the U.S. Sentencing Commission (*Federal Sentencing Guidelines Manual*, 2015). Recognized as a part of the judicial branch of the U.S. government, their

purpose is to enact sentencing policies and practices for the federal criminal justice system when wrongdoing occurs.

## Assumptions

An *assumption* is an aspect of a study that is out of a researcher's control, believed to be accurate, but that cannot be proven or demonstrated (Locke et al., 2013). Phenomenological research relies on participants' life experiences and expert knowledge. The following are assumptions relevant to this study:

The participants in this study had served in a role responsible for oversight of an organization's ethics culture, ideally titled corporate ethics officer. My study participants must have had similar roles within their organizations to support their governance of the compliance and ethics functions. Therefore, I assumed a sufficient participant sample from organizational leaders with EO experience could be selected. Those leaders held these job titles in their current or previous positions: chief ethics officer, chief compliance officer, chief compliance and ethics officer, chief integrity officer, chief trust officer, executive vice president, vice president, senior director, or director. I looked for these titles as part of the participant selection criteria. Further, I assumed there was a potential that not all these titles would be represented in my participant pool, but rather, a combination of them could be found.

Also, I asked potential participants to describe their roles within their organization for an added selection validation step. I assumed the EO duties across the various organizations would be similar enough to allow for participant response comparisons. If

these duties differed drastically across organizations, I could have struggled to find overlapping themes during the data analysis process.

Another assumption illuminated that the study participants would be willing to share insight into their experiences of engaging executives honestly and promptly on ethical behaviors. My approach was to foster trust that supported open conversations with all participants while keeping the participants' identities and associated organizations confidential. I clearly explained the study's purpose and conducted interviews with the participants in their natural working environment to reduce researcher bias.

Kim (2011) recommended conducting a pilot study to allow a researcher to apply adjustments and test protocols before conducting more extensive research. I assumed that by conducting a pilot study, changes to the questions or the interview protocol before completing the primary research would increase the success of the overall study.

I assumed that member-checking of interview transcripts would ensure that participants' experiences relating to the phenomenon being studied were adequately reflected in the results. A key aspect of IPA research, described by Smith et al. (2009), is that a researcher tries to make sense of a participant's responses while the participant is attempting to make sense of their personal experiences. Smith et al. cautioned that a researcher could interject their own experiences and beliefs when capturing and interpreting participant's experiences. I remained conscious of this bias and worked to ensure the phenomenon being studied stood for my participants' perspectives over those of my own.

**Scope and Delimitations**

According to Locke et al. (2013), scope and delimitations are parameters that set a study's boundaries. These boundaries are areas a researcher can control. Delimitations usually pertain to sample size, participant geographic region, instrumentation, and data collection methods. My research problem indicated some boundaries relevant to this study.

I conducted my research using Brown and Treviño's (2006) ethical leadership theory as the conceptual framework to gain insight into how EOs make sense of their experiences and the effectiveness of their role in influencing executive-level ethical behavior. The intent was to use a purposive sample from leaders who, at some time, served in the role of corporate EO or were responsible for creating or maintaining an organization's ethics culture. These participants were at the director level or above and represented organizations operating in North America with an established ethics and compliance program.

Chavez et al. (2001) explored the relationships among EOA (later known as the ECOA) membership, firm size, and executives' time in the position. Chavez et al. researched 130 firms across 31 industries, where 65 were members of the EOA. The researchers deduced that the 65 firms with membership to the EOA did so to signal an intent to be compliant with the FSGs. Sampson (2016) stated that many EO positions were created after the occurrence of ethical misconduct.

Membership in a community of practice implies an interest in maintaining high ethical standards (Weller, 2017). My target participants were those who were active in a

community of practice or were active between 2012 and 2022. I did not include EOs from organizations that did not have an established ethics and compliance program or were not active members of a nationally recognized community of practice.

## Limitations

Rudestam and Newton (2007) said that limitations are restrictions found in the study over which the researcher has no control. While limitations are not to be excuses, early identification helps the reader gain a sense of the research and understand the results.

Several limitations are associated with the IPA approach. Initially, a researcher needs to be concerned that some participants may not share their experiences fully (Gee et al., 2013) while holding back critical details. This absence of detail could have hindered my ability to capture the meanings of those experiences and could have impeded the process for themes to appear. To minimize this limitation, I established rapport with the participants and created an atmosphere that allowed them to focus on the dialogue without distractions from their daily duties. Further, the interviews occurred with participants in their natural work environment. I used multiple data sources, such as researcher observations and audio recordings of the interview sessions, to enhance the accuracy of my interpretations.

According to Gee et al. (2013), a second limitation is that participants may provide pre-edited response versions of their behavior as they mentally attempt to make sense of their experiences rather than giving insight into their actual experiences uncut. One bias that might have been present in my sample was that the participants may have

performed as a response to regulatory pressures. This motivation could have influenced the participants' experiences and perceptions of the effectiveness of their role. Descriptions and themes that emerged in my research were confirmed by allowing participants to member-check the accuracy of their responses during the data analysis phase. Follow-up interviews with participants served this task well when needed.

As presented by Larkin et al. (2019), a third study limitation was that the IPA methodology provides a one-dimensional perspective when searching for the meaning of participant events and processes that influence their perceptions. While a multi-perspective design was not used for this study, I established my sample to consist of a homogenous group who shared experiences of the single phenomenon being studied.

The sample size for this study was small. According to Smith et al. (2009), the objective should be to capture the experience of the phenomena thoroughly and systematically through "purposively-selected and carefully situated samples" (p. 29), where participants represent a perspective of the phenomenon, not the whole population. Each participant's conditions and duties in their role as EO may have been so different that consistent themes did not appear as expected. If required, follow-up interviews were considered to find enough consistency within the role to analyze the study findings.

According to Smith (2011), it is essential for a researcher to learn from participants through open dialogue about their terminology, meanings, and mannerisms to become familiar with how they make sense of the phenomenon. With IPA's intense, language-based approach, it is logical to expect a researcher to have presupposition or expert knowledge of the phenomenon under examination—in the case of this study, the

role of the EO and those factors that influence the effectiveness of the role (Lopez &

Willis, 2004). I had not served as an EO in a professional capacity. Therefore, I

minimized this limitation by emphasizing the IPA foundation, which I demonstrated

when the participant was trying to understand and make sense of the world around them

while I was trying to understand the participant (see Roberts, 2013).

## Significance of the Study

Sampson (2016) stated that strong ethical cultures need a workforce with special

moral skills. The EO's role must be more than window dressing, establishing a culture of

profitability, and a robust moral code of conduct. According to Schwartz (2013), ethical

behavior within an organization directly relates to executives' relationship to their core

ethical values. Despite this relationship, there appears to be a negative perception of

executives and adherence to ethical standards. Organizations where senior leaders want

open communications with the employees have a higher probability of establishing a

culture that prioritizes ethics (Gnazzo, 2011).

The shortfall found in the literature illuminated a gap in the knowledge and

understanding of measuring the effectiveness of the EO role. In most cases, this role is

measured by the overall program performance and not as a stand-alone function. This gap

leads to a blinded path by organizations and leaders who assume they are compliant until

they are not and perpetuates a cycle of scandal and public mistrust. Understanding the

factors that enhance EO effectiveness could lead to a better return on investment for

organizations and positive benefits to society.

**Significance to Theory**

This study extended the body of knowledge by focusing on the effectiveness of the EO role and the way this role influences executive-level ethical behavior. Such a study could be the genesis of a research bridge between how the effectiveness of the role is measured, what aspects of an organizational culture that link to effectiveness could be measured, and why specific measurements are more critical than others regarding the effectiveness of the role and the overall compliance program. This study could help advance ethical leadership theory by bridging the relationship between senior organizational leaders and the EO role to understand organizational performance issues and EO candidate recruiting trends based on candidate characteristics and senior leader expectations. Lastly, this research could bring a deeper understanding of the influence of the EO on senior organizational leaders by providing insight into the antecedents of ethical leadership.

**Significance to Practice**

The practical application of these findings could improve the effectiveness of the EO in cascading a robust ethical culture and repairing corporate ethical reputations. Enhancing the effectiveness of the role could improve employee recruitment and retention efforts, facilitate public trust, and provide a gateway to global competitiveness. According to Potts and Matuszewski (2004), these outcomes are facilitated through successful compliance programs and an influential EO. While scholars know little about the effectiveness of the EO role, gaining a better understanding of factors that have an influence could lead to changes in the way organizational leaders view leadership

structures, organizational cultures, and ethical training programs (both academically and in practice).

**Significance to Social Change**

This study may contribute to positive social change in several ways. A positive change in corporate leadership's social views could include increased employee commitment through ethical awareness, improved ethical decision-making, and reduced unethical behaviors. According to Treviño and Weaver (1999), there is potential that positive social change could occur from a value-based cultural approach to ethics management. Second, ethics training is focused primarily on the employee (98% of organizations surveyed in 2010 conducted training once a year, according to Weber and Wasieleski [2013]) to emphasize ethical resolutions when faced with at-work dilemmas and the importance of reporting misconduct. Little emphasis has been placed on managing ethical climates and cultures, ethical infrastructures, and the flow of messages about ethics throughout an organization (Treviño, den Nieuwenboer, & Kish-Gephart, 2014).

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**Summary and Transition**

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The focus of Chapter 1 was on establishing the need for this study by briefly highlighting the existing literature and showing that there is a lack of research into EOs' experiences, perceptions of effectiveness, and whether they effectively influence executive-level ethical conduct. Despite all the emphasis placed on corporations to develop the role of the EO within their organization, corporate misconduct continues, suggesting EO effectiveness remains an area for reform (DeMott, 2013). My proposal to

use an IPA design emerged from the gap in the literature and the lack of understanding about EO effectiveness. The essence of this study was to explore the effectiveness of the role in influencing executive-level ethical behavior. Justification for an IPA research method included a recommended sample population, sample size, and a high-level overview of the research process. A brief background of the problem, the problem statement, the study purpose statement, a research question, a theoretical framework, a definition of terms used within the study, assumptions, limitations, and scope and delimitations were presented. The chapter concluded with an elaboration on the significance of the study to theory, practice, and social change.

In Chapter 2, I share the strategy for searching the literature and various methodologies related to the problem and the organization of the literature review. Chapter 2 includes a critical review of the existing literature on ethical leadership theory, ethics and compliance programs, and the role of the EO. The literature summary shows gaps in the current research and justifies the problem selection and the research question.

Chapter 2: Literature Review

Despite the efforts to shape the ethical conduct of corporate leaders, there is a limited understanding of the effectiveness of the EO role and its influence on executive-level ethical behavior (Kaptein, 2014). This lack of understanding illuminates a gap in ethical leadership research related to strategies used by EOs and their effectiveness as influencers of ethical behavior among top leadership. Thus, the research problem was that despite the adoption of extensive corporate programs and an abundance of government oversight, there is a lack of knowledge and understanding of EOs' experiences, their perceptions of their effectiveness, and whether they effectively influence executive-level ethical conduct.

In the literature, there is an abundance of research on various corporate compliance and ethics programs that could be used for monitoring and improving corporate ethics culture (see Carroll, 1991; Stevens, 2008; Weaver et al., 1999; Weber, 2015). There is also a large corpus of literature on characteristics and requirements of corporate compliance and ethics programs that include the EO role (see Gnazzo, 2011; Hogenbirk & Dunn, 2020; Martin, 2015; Miller, 2017).

In Chapter 2, I describe my literature search strategy related to compliance and ethics programs, EOs, and ethical leadership theory. Then, I discuss ethical leadership theory as the conceptual framework for this study. I describe and compare the research related to the EO role in the literature review section of this chapter. I summarize and synthesize the literature related to the evolution of research on the current state of corporate ethics, elaborating on the general approach to corporate ethics and the role of

the EO. Further, I discuss in detail the ethical leadership theories and their uses in prior research. Then, I synthesize the research on applying the IPA methodology related to my research question and why this method is a meaningful approach. Finally, I summarize the major themes from the literature, including what is known and what is not known related to the role of the EO in guiding leadership behavior and ethical leadership theory. I conclude the chapter by describing how my study fills a gap and how it contributes to the body of knowledge on the role of the EO in corporate leadership, followed by a brief transition to Chapter 3.

## Literature Search Strategy

The scholarly sources for this literature review originated from multiple research databases, including ProQuest Central, Science Direct, ABI/Inform Complete, and Business Source Complete. Other databases included the Academy of Management, EBSCOhost, Elsevier, Emerald Management, Journals of Business Ethics, Springer Journals, and Sage Journals. Google Scholar alerts were used to receive notifications of new literature in various fields. Cross-referencing of non-scholarly information occurred using Google and Wikipedia to broaden my search criteria.

My searches consisted of these key terms and combinations using the AND and OR functions. I searched peer-reviewed journals using the following Boolean search expressions:

- *code of ethics*
- *compliance officer*
- *compliance* and *ethics officer*

- *compliance* and *ethics programs*

- *corporate ethics*

- *corporate misconduct*

- *corporate scandals*

- *ethics officer*

- *ethical leadership*

- *ethical leadership behavior*

- *ethics* and *compliance officers association*

- *ethical leadership theories*

- *ethics management*

- *ethics officer effectiveness*

- *ethics program effectiveness*

- *federal sentencing guidelines*

- *organizational ethics*

- *organizational ethical culture*

- *organizational governance*

- *unethical leadership behavior*

- *descriptive phenomenology*

- *interpretative phenomenology analysis*

- *qualitative methodology*

- *phenomenology*

My literature search strategy included taking a historical view of organizational ethics and compliance programs and their development and ethical leadership theory from the seminal works of key figures such as Joann Ciulla, Michael Brown, Linda Treviño, Marie Mitchell, Gary Weaver, Mark Schwartz, Muel Kaptein, and so on, dating from 1989 to 2021. Additionally, my strategy was based on searches of studies and literature in the areas of *top management teams, ethical climate, ethical culture, organizational culture, social role theory, social learning theory, stewardship theory, pro-organizational behavior, social ethics, compliance regulations, and utilitarian, altruism, virtues, and deontological theories.*

I used a process of citation chaining to find added references and bibliography lists from other studies to find possible related sources. Also, I researched books written by authors who had published peer-reviewed articles and authors who were considered subject matter experts in ethical leadership and executive-level ethical behaviors.

The scope of this study was limited to EO influence on executive-level leadership behaviors. Therefore, I did not include literature found on the impacts of the compliance program on employee performance and retention rates, organizational governance, corporate social responsibility, and global leadership.

## Conceptual Framework

The phenomenon for my study was the perception of the effectiveness of ethical leadership strategies used by corporate EOs to influence the ethical behavior of their organization's executive-level leadership and subsequent ethical behaviors used by all subordinates within an organization. Prior research on the topic of the EO role has relied

mainly on exploring corporate compliance programs, corporate ethics codes of conduct (Kusserow & Boateng, 2015), training programs, and alignment with regulatory governance policies and laws. There has been research on how compliance programs impacted the ethical corporate culture (see, for example, Schwartz, 2013). Other research has focused on the legitimacy of the EO role (Treviño, den Nieuwenboer, et al., 2014), the role within an organization's structure, and the characteristics and responsibilities of the role (Adobor, 2006, 2019; Mazsur, 2017; Weaver et al., 1999). Most recently, Hogenbirk and Dun (2020) embarked on connecting innovation and creativity with the role of the EO.

The dimensions of ethical leadership theory emerged from prior studies on transformational and charismatic leadership (Brown et al., 2005) to define business ethics through ethical leadership using a normative, social, and descriptive approach and to establish a framework of right versus wrong (Brown & Mitchell, 2010). As Brown and Treviño (2006) defined them, ethical leaders are expected to be trustworthy, honest, respectful; and to act with integrity, communicate ethical behavior through one's actions, perceive ethical status as learned through an individual's social learning experiences, and care about people and the broader needs of society. The conceptual framework for my study was based on these Brown and Treviño core principles. Ethical leadership is normatively appropriate behavior perpetuated through interpersonal relationships, decision-making, role modeling, two-way communication (DeConinck, 2015), and reinforcement of prosocial behaviors.

The normative approach, rooted in philosophy, prescribes behaviors that workplace leaders should demonstrate (Brown & Mitchell, 2010; DeConinck, 2015)**.** The social scientific approach, established in the principles of the fields of psychology, sociology, and organizational behavior, focuses on gaining an understanding of the perceptions of leadership antecedents, conditional boundaries, and overall performance outcomes. Initially, researchers viewed ethical leadership as a descriptive example of accountability and responsibility that hinged on the morality of leader behaviors, described by the moral person-moral manager dimensions (van den Akker et al., 2009; Brown & Treviño, 2006; Schwartz, 2013; Treviño et al., 1999).

Ethical leadership postulates that the moral caliber of the leader shapes the moral strength of society (Kanungo & Mendonca, 1996). The literature supports that ethical leadership is directly related to executive leadership behavior, required by external regulatory requirements (Mey et al., 2014), and strongly associated with culture (Alahmad, 2011). The principles of ethical leadership theory extend this sentiment further to focus on a leader's character of personal conduct (altruism), intrinsic qualities (honesty, integrity, trustworthiness, reliability, and accountably), and morality (equality, sense of justice, and a sense of brother/sisterhood; Ciulla, 2004). Society holds modern corporations to higher ethical expectations as stewards of society's ethical well-being. According to Mey et al., ethical practices, ethical leadership, and an organizational ethical climate promote ethical behavior. Toor and Ofori (2009) believed that ethical leadership includes managing organizational behavior and holding everyone accountable.

Resick et al. (2006) said that there are four different schools of thought on ethical leadership: (a) virtue ethics, (b) utilitarianism ethics, (c) deontological ethics, and (d) altruism ethics. These schools frame the standards of ethical leadership conduct. Marsh (2013) said that the virtue ethics theory has roots in an Aristotelian sense because practical judgment and adoption come from the regular use of ethical behavior developed with practice, which reflects a leader's character. Marsh continued to define virtue ethics as behavior leaders learn through experience while establishing habits and molding one's character, otherwise reflective of turning inward on the importance of engaging in the right actions for the situation. Aristotle's seminal view of the virtue ethics theory is based on the traditional characteristics of trust and moral principles, balancing morality, and power as the foundation of charismatic leadership.

Beu and Buckley (2001) defined utilitarian ethics as behavior considered right if the outcome produces the best results for the most significant number of people. Beu and Buckley argued that behavior alone is neither good nor bad. Still, the outcome must be judged based on the fairness of the consequences to determine the ethicality of a leader's actions. Resick et al. (2006) took this definition further by introducing the use of social power and community to motivate and empower ethical behavior. Burnes and By (2012) elaborated on the utilitarian theory, pointing out that leaders' behaviors should benefit everyone, including themselves. Seminal researcher John Stuart Mill argued that most leaders want to do good to benefit the groups they associate with directly rather than the entire world population (as paraphrased by Ciulla, 2005).

Deontological ethics introduced a view of ethical leadership that separated the good of the action from the consequences of the outcomes based on the intent of those actions (Resick et al., 2006). As noted by Resick et al. (2006), Kant's view of deontology argues that a sense of duty guides one's intentions and motivations to the moral aim of one's actions, where the judgment of those actions should not be based on the consequences. Deontology is grounded in people-based aspects of ethical leadership, such as character, integrity, awareness, and a sense of community. de Colle and Werhane (2008) stated that the critical factors are those that motivate action toward some different outcome where the belief is that those engaging in the activity think they are doing the right thing.

Altruism, the ethical–moral gold standard, is evident when leaders are driven by the concern to benefit others above all else, even when there is a cost to themselves (Ciulla, 2005). Altruism has been described as self-sacrificing relative to motivational triggers and behavioral outcomes. Kanungo and Mendonca (1996) contended that altruistic leaders are concerned with their organization's good and its members; and, therefore, are effective as charismatic leaders. The focus is on the leader-follower relationship and the quality of the shared vision, as this vision guides an organization toward goals that benefit the whole organization.

Toor and Ofori (2009) defined ethical leadership while comparing transformational to transactional leadership cultures to understand the world in a broad sense based on the present situation that requires the skill to act purposively within everyday conduct. Toor and Ofori's ethical leadership cornerstones were integrity, ethical

standards, and fair treatment of others based on moral perspectives. Key differences among these theories are evident within the approaches toward setting organizational vision, acceptable social values, and the emphasis on moral management. One important aspect of ethical leadership is navigating cultural and social biases to further the evolution of ethical leadership, build diversity-inspired trustworthy relationships, and remain profitable while socially responsible within today's culturally diverse organizations (Resick et al., 2006).

The ethical leadership conceptual framework relates to my approach and research question because I sought to understand EOs' perceptions of their effectiveness in influencing executive-level leadership behavior and ultimately refine compliance and ethics programs by closing the gap between ethical expectations and executive-level misconduct. The concepts of ethical leadership theory founded on the fundamental principles of honesty, integrity, trustworthiness, reliability, and accountability (Brown et al., 2005; Brown & Treviño, 2006) shaped my study because it was essential to define the EO as the member of the leadership team who is primarily responsible for the ethical health of an organization. The EO role represents a system of behavior governance based on social norms and principles of conduct. Those in this role act within an organization's goals and focus on the service of the larger group rather than self-serving individual leaders. Therefore, extending the understanding of EOs' effectiveness within the executive leadership team supplies an understanding to bridge the gap between the perceptions of right versus. wrong and the potential to narrow the occurrence of misconduct. This study drew on the ethics and leadership literature to explore the re-

conceptualizations of ethical leadership to provide insight into corporate EO perceptions of their influence on executive-level ethical behaviors within ethical leadership.

<div align="center">**Literature Review**</div>

**Overview of Corporate Compliance and Ethics Programs**

*Evolution of Corporate Ethics*

For decades, executives struggled to balance a responsibility to maximize shareholder dividends with a commitment to society (Carroll, 1991). While executives focused on profitability and business decisions beyond economic returns, a shift to social responsiveness occurred. This shift emphasized legal compliance and ethical norms, fairness, and justice of the corporation, which introduced a struggle between corporate morality and immorality.

According to Brooks (1989), interest in corporate ethics increased due to skeptical confidence in the ethical behaviors of corporations. Executives wanted to control corporate ethics to better the company and society by managing behaviors. Additionally, executives knew that investors favored an ethical dimension of decision-making that expected adherence to ethical standards and emphasized quality results.

A high rate of financial and behavioral scandals involving executive-level leadership misconduct caused organizations to recognize the growing gap in their moral responsibility to society (Pies et al., 2009). This gap in moral responsibility resulted in the creation of corporate ethics and compliance programs and the emergence of the EO role (Weber, 2015). Scandals such as Enron, WorldCom (Bennis, 2007), Volkswagen

(Schiermeier, 2015), and Wells Fargo (Miller, 2017) strengthened the public concern about the perceived limitations of ethical leadership.

The evolution of corporate ethics took many forms, each with different approaches to shaping corporate culture. This evolution began with the early undefined view of ethics and morality that later transcended into a *protect the leaders at the top* approach characterized by profit and moral struggles where corporate profit justified practices, outcomes, and misconduct. Later, corporate ethics shifted to a *compliance-based checklist* approach with the U.S. FSGs of 1991, which offered leaders an outline to build corporate compliance programs and potentially reduce misconduct penalties. As the evolution continued, the emphasis shifted to a *values-based* approach focused on environmental and social justice views coming to the forefront of corporate ethical practices (Lee, 2011). Meanwhile, today we see a *blended mixture* of protecting the corporation, complying with regulations, valuing social norms and views, and building profitable corporate cultures based on integrity and fairness.

Ciulla (2005) shared that every action demonstrated by a leader, ethical or unethical, has a ripple effect on their circle of influence. Components such as fairness, justice, and the greatest collective good go beyond values and beliefs. Ciulla emphasized that failures occur when leaders miss living up to the moral standards that guide others. Unethical leadership behavior that is pro-organizational presents a struggle to control. Treviño, Weaver, and Brown (as cited in Dean et al., 2010) stated that the perception of ethics varied significantly between executives and other employees. Zhang et al. (2018)

illuminated the moral and social impacts of unethical leadership behavior as contagion, showing that pressure to deliver economic benefits came at the cost of moral corruption.

Globalization and technology added highly visible accelerants to unethical leadership scandals. This intense surge of corruption scandals, according to Brown and Treviño (2006), had researchers searching for empirically based solutions. Further, Lee (2011) attributed this increased visibility of the rising rate of scandals and leader misconduct to the increasing pressure to hold business leaders accountable to the communities they serve and the demand to improve conduct based on government regulations. Having insight into those factors that affect the effectiveness of the EO role could contribute to the reform of ethical leadership misconduct, affect the firm's financial performance, and increase the ability to sustain ethical corporate cultures.

Each publication on ethical misconduct became clearer that determining right and wrong had become a matter of opinion (Lee, 2011). Society and executive-level leaders appeared to be losing a clear sense of moral direction. "Ethical issues arise because of conflicts among individual values, organizational values, and societal values" (Ferrell et al., 1998, p. 362). Social acceptance of misconduct, shaped by the world's global culture of executive-level leaders who struggle to juggle right from wrong, illuminated that even after the increased regulation, public oversight, and intense emphasis on ethics training programs, according to Alahmad (2011), ethical leadership still suffered both morally and socially.

Lee's (2011) interpretation reflected that unethical practices rapidly became acceptable in those circumstances where the misconduct was not discovered. He believed

ethics demonstrated society's cultural breakdown where honesty and character were not held in high esteem as they once were in prior centuries. Pfeffer (2015) stated in his book on problems with Leadership that need fixing those attitudes on ethical conduct differ based on situations and the individual position held in an organization.

In the 1960s, corporations used legal and human resource approaches to address ethical issues. There was a drive toward establishing big businesses that could create a global, multinational presence for North America to become a dominant economic force. The growth allowed for public scrutiny of corporate leaders to establish ethical, honest corporate cultures and introduce socially responsible practices.

Corporations, riddled with misconduct and publicly visible scandals, moved the view of ethics from a compliance approach to a value approach in the 1970s (Lee, 2011). The recession continued to drain the economy and escalate unemployment. While economic struggles continued to increase, the spotlight turned toward the ethical shortcomings of big businesses and the unethical behavior of corporate leaders.

In the 1980s, leadership misconduct surfaced in fraudulent accounting practices, controversial sales techniques, and questionable use of corporate funds (Ferrell et al., 1998). Ethics practices became a method to protect executives and the company's reputation from public scrutiny. According to Brooks (1989), a shift forced corporations to provide increased disclosure of their ethical performance from ethical investors who emphasized quality to ensure their investments were secured from ethical penalties. As the evolution of compliance programs continued, so did the regulatory scrutiny and the

emphasis on compliance-based approaches to corporate ethics and effectiveness

measurements (Chen & Soltes, 2018).

### *Compliance Approach*

A compliance-oriented ethics approach increased the need for monitoring

employee behavior that could reduce trust and use threats and coercion tactics to produce

productivity and a perceived sense of loyalty (Treviño & Weaver, 1999). Regulators

emphasized the need for compliance-oriented ethics programs to ensure regulations were

adhered to in the 1990s. The check-the-box approach became the norm surrounding the

intertwining of a code of conduct and an organization's mission (LRN, 2016). During this

period, ethics practices commonly applied many layers of rules, checklists, and

procedures.

According to Hopkins (2013), most significantly, corporations published a code

of ethics and instituted an ethics and compliance program to align with the FSG

published in 1991. The FSG steered the focus of the compliance program toward

detecting and preventing misconduct (Mazur, 2017) by imposing penalties for

occurrences of misconduct and offering lessened penalties when compliance programs

were in place. According to Garrity-Rokous and Baker (2017), the purpose of compliance

programs was to maintain synergies through standards, decision-making, and roles and

responsibilities. Further, these programs connected legal requirements with corporate

values, reinforcing preferred behaviors and improving organizational performance.

*Values Approach*

"A values-oriented ethics program can be perceived as supporting employees" (Treviño & Weaver, 1999, p. 320). In the 2000s, most compliance programs focused on structural elements such as policies, training, education, reporting lines, hotlines, and audits (LRN, 2016). Using the social exchange theory, Treviño and Weaver (1999) argued that when employees perceive they are valued within an organization, that perception creates an employee's sense of obligation to support organizational goals and ethical values. Additionally, ethical trends found regulators demanding more focus on establishing ethical cultures and supporting behavior with less emphasis on the many layers of rules and procedures. Values replacing checklists were at the core of corporate operations toward creating ethical cultures and acting as catalysts or predictors for higher performance standards.

Kaptein (2014) stressed a logical link between an ethics and compliance program's influence and the corporate ethical culture. Bonime-Blanc and Coyne II (2014) stated that executives and the board of directors still struggled with defining the effectiveness of their corporate ethics and compliance programs. Also, the return on the investment of appointing an EO came into question (DeMott, 2013) with the quest to maximize profits and minimize costs. Schwartz (2013) acknowledged that a formal ethics program coupled with consistent ethical leadership was significant in reducing the negative impacts of unethical activity. Weber and Wasieleski (2013) proclaimed an urgency to enhance the effectiveness of corporate ethics and compliance programs to ensure they reflected more than a window-dressing on social expectations and regulatory

requirements. Further, they stated that the critical practices of the ethics and compliance program had remained virtually unchanged over the years. Kaptein (2009) listed those essential practices as follows:

- a code of conduct which is the foundation of the program

- an EO merged into the organizational hierarchy

- ethics training and communications in place

- an operational ethics hotline (feedback procedures)

- policies on unethical behavior accountability

- policies on ethical behavior incentives and rewards

- control mechanisms of monitoring and auditing

- investigations and corrective policies

- pre-screening is incorporated into the hiring practices

The ethics and compliance program spans many aspects of the corporate structure, and it has seen little change in the definition of the components since the FSG was introduced in 1991. The Foreign Corrupt Practices Act, introduced in 1977, was designed to protect the credibility of honest U.S. companies doing business in foreign countries (Martin, 2015) and came about due to foreign bribery scandals (Weber & Wasieleski, 2013). Another significant regulation that perpetuated the evolution of the corporate ethics and compliance program included the Sarbanes-Oxley Act (SOX) of 2002 (Myers, 2003). SOX required organizations in the financial space to adopt a code of ethics and mandated that board members were included in ethics training programs (Weber, 2015).

SOX intended to strengthen investor confidence and improve corporate governance (Davidson & Stevens, 2013).

More robust regulatory changes came with the requirement of establishing the corporate EO role, where the responsibility of designing and executing an ethics program that fits the organization's context and complies with federal, state, and local regulations relies on the effectiveness of the EO (Hogenbirk & Dun, 2020). The EO is "responsible for the strategic and operational leadership of the ethics and compliance program (p. 2).

**Overview of the Corporate Ethics Officer Role**

*Evolution of the Ethics Officer Role*

Prior research on the EO role has relied mainly on the business ethics view of corporate compliance programs and corporate ethics codes of conduct (see, for example, Weber & Wasieleski, 2013). Other research has taken a corporate governance view, focusing on the legitimacy (Treviño, den Nieuwenboer, et al., 2014) and the characteristics and responsibilities of the role (DeMott, 2013). Also, there is a plethora of research on the impact of compliance programs on the corporate ethical culture (see, for example, Schwartz, 2013).

The role of the EO was created to watch over corporate actions (Morf et al., 1999). Corporate leaders responded to the intense public concern about leadership misconduct and the continued evolution of government regulations by adopting ethics and compliance programs and creating the EO role. Nevertheless, corporate scandals continued to accentuate the growing display of unethical leadership behavior due partly

to the limited understanding of the EO role and the factors influencing EOs' effectiveness (Gnazzo, 2011).

The EO is a relatively new leadership position adopted in 1985 when Gary Edwards created the new EO role to save the public reputation of the General Dynamics Corporation. The adoption of compliance programs and the role of the chief ethics and compliance officer in the 1980s and 1990s were primarily for show to satisfy society's desire to view corporations as socially responsible, guide lower-level employee behavior, and safeguard leadership (Bolt-Lee et al., 2014). The 2015 Compliance Trend Report concluded that 80% of the 364 ethics executives surveyed perform some enterprise-wide ethics assessment, while only 30% measure the effectiveness of their ethics program. Only 24% ranked the corporate culture as essential to their ethics goals (Jaeger, 2015).

According to Weaver et al. (1999), firms with a single EO responsible for the organization-wide ethics and compliance program effectiveness could bring a false sense of security into the organization's ethical health. Weaver et al. found that most EOs spend little time on ethics-related activities. Including a single individual responsible for the EO role does not ensure executive attention to controlling ethical misconduct. Weber and Wasieleski (2013) studied the current state of ethics and compliance programs focused on organizations in the United States. They found that EOs are critical to an organization's overall compliance program even though corporate executive scandals continue. Weber and Wasieleski stressed that only ethics and compliance programs deeply seated within a robust ethical culture would succeed in modifying unethical behavior.

Weber (2015) noted that the ethics programs presented gaps in the standards based on regulatory pressures and misalignment of the EO role within the corporate culture. According to Aznar and Vaccaro (2015), a surfeit of compliance and regulatory requirements (nationally and internationally) took the corporate EO role far beyond traditional expectations. The federal government endorsed the EO role as one that would directly address occurrences of misconduct with organizational leaders who violated the codes of conduct and legal and regulatory expectations (Mazur, 2017). When examining high-profile corporate scandals, Soltani (2014) found that contributing factors such as ineffective controls and inadequate governance policies reinforced arbitrary decision-making and executive-level misconduct. Kusserow and Boateng (2015) highlighted that many corporations recklessly approached creating the role of the EO.

Treviño, den Nieuwenboer, et al. (2014) stressed that the role of the EO, which was responsible for creating and maintaining the ethical culture, remains an area where little scholarly knowledge was known. Some of those areas focused on the EO's real-life experiences, the measurement of their effectiveness, the role influence on executive-level leadership behavior, and the outcomes of actions to shape organizational culture. Sampson (2016) stated that the EO's role was to protect executives by avoiding prosecution and inspiring others to do the right things morally and socially despite the new awareness that ethical breaches are closely associated with "good people doing bad things" (p. 73).

The EO role emerged with the U.S. FSGs of 1991 to "provide management with a broad perspective of the organization's stakeholders" (Izraeli & BarNir, 1998, p. 1189)

and to improve the ethical essence of the organization. Weaver et al. (1999) contacted Fortune 1000 firms to explore the adoption of compliance programs that included ethics policies, a code of ethics, and the EO role. Their findings reflected that 54% of the firms reported an EO role, while few modified their structures to facilitate the newly adopted role. The 2022 Ethics and Compliance Program Effectiveness Report (LRN, 2022) noted that 76% of high-impact organizations have a board of directors that ensures senior executive misconduct is effectively addressed, and 72% use misconduct trends to evaluate the overall program impacts on the organization. In contrast, Hogenbirk and Dun (2020) noted that unethical occurrences in top management have risen from 3.9% to 5.3% over the last decade.

Pendse (2012) compared the EO to a law enforcement officer, where the EO's focus would be to ensure adherence to current rules and regulations. Using this definition, the EO would deal with ethical breaches at the lower levels of organizational hierarchy and not so much at the top levels of the leadership team. Pendse also introduced a separate role of an ethical hazard marshal to complement the EO role. The marshal's role would focus on identifying potential problems and modifying the organizational framework, policies, and values before ethical breaches occur. Pendse's framework described the EO as one who deals with misconduct after it happens and ensures the organization meets the requirements of the FSG and SOX. The ethics hazard marshal would seek to be a step ahead of misconduct to safeguard the organization from itself rather than government regulations and the legal system and ensure organizational changes occur to avoid wrongdoing. The modern-day EO fulfills both these roles.

Taylor (2015) emphasized that the EO was often spread too thin to be effective. Glapion (2014) stated that having an ethics and compliance program or an EO appointed was insufficient. Additionally, the pace and "complexity between the regulators, the compliance team, and the operational teams" (Burdon & Harvey, 2016, p. 197) created difficulties for EOs who needed improved conceptual models to navigate the barrage of changing regulations and social expectations. Kusserow and Boateng (2015) emphasized that the absence of an effective EO potentially increased the risk to the business or, worse, damaged the program and ethical culture.

### *Communities of Practice*

Communities of practice provide a structure developed around people who leverage commonality in language, tools, and other artifacts (Weller, 2017). Membership in organizations such as the ECOA, SCCE, SOC, or HCCA implies a genuine interest in maintaining high ethical standards within an organization's culture without being driven solely by the fear of regulatory penalties (Chavez et al., 2001). These organizations are comprised of members from the backgrounds of legal, security, audit, finance, and human resources (Kavanagh, 2008) and compliance professionals who are interested in establishing and maintaining standardized compliance and ethics standards (Weller, 2017).

The EOA is a professional organization originating in 1991 from small meetings of EOs from local corporations who came together to share stories of their corporate ethical practices (https://www.ethics.org/the-eoa/). The focus of the original 15 ethics managers was on programs to promote compliance and ethical conduct. By 1995, there

were 500 EOs participating. Membership required the managers to be responsible for their organization's ethics program and a member of upper management (Chavez et al., 2001).

The ECOA, formally known as the EOA, promotes the importance of ethics and compliance programs within the corporate culture (Hogenbirk & Dun, 2020). Membership includes corporate and not-for-profit professionals who promote ethical practices, exchange information and strategies, and share ethics software to improve the efficiencies of the EO (Adobor, 2006).

SCCE members include attorneys and compliance professionals across many industries who help solve legal issues and offer education on business ethics. Membership in the HCCA promotes quality compliance programs and supports the belief that profit-driven business practices and ethics can co-exist in the corporate structure (Murphy, 2002).

These professional associations, characterized by Weller (2017) as communities of practice, emerged to provide a forum for the EO to define the role and reduce confusion regarding their duties. Also, these organizations provided a mechanism for EOs to support each other and actively earn respect within their organization. These benefits continue as the associations morph with social norms and regulatory requirements.

### *Role Expectations and Characteristics*

Are we expecting too much from the EO? Taylor (2015) reported that a need existed to have an effective compliance program, and an EO is crucial to the program's

overall effectiveness; however, the EO is spread too thin with too many duties. Aznar and Vaccaro (2015) shared four critical aspects of the EO's function. Initially, the EO establishes behavioral expectations throughout the organization, setting examples and providing guidance based on the corporate code of conduct and the organization's mission. Second, the EO's role is to detect and prevent criminal misconduct at all levels within the organization. Third, the EO is expected to respect and uphold human rights by informing and guiding their organization ethically and in compliance with all regulatory and legal policies. Lastly, the EO is expected to develop leaders who can perpetuate strong ethical cultures while balancing the quest for profit and the social demands of ethical conduct. Adobor (2006) added the task of accountability for all activities related to the ethical standards of conduct, including an organization's customers.

Treviño, den Nieuwenboer, et al. (2014) defined the EO as a high-level individual responsible for creating ethical, law-abiding leaders who produce and maintain an ethical environment. The EO must ensure that organizational values are included in the leadership's decision-making processes.

EOs came from legal, financial, human resources, and auditing backgrounds (Kavanagh, 2008). The need to enhance compliance programs with new regulatory requirements and increased oversight from the Department of Justice (DOJ) and Office of the Inspector General (OIG) illuminated the criticality of having the right experts in the role of EO (Kusserow & Boateng, 2015). Further, the understanding of the EO role was still lacking within the executive level of leadership (Gnazzo, 2011), which hindered the

authority and legitimacy of the role in many organizations (Treviño, den Nieuwenboer, et al., 2014).

Weaver et al. (1999) contacted Fortune 1000 firms and discovered a high degree of organizations adopted the concept of creating compliance programs that included ethics policies and a code of ethics. Few organizations modified organizational structures to facilitate the newly adopted ethics policies and code of ethical conduct. Further, Weaver et al. found that 54% of the firms reported the existence of an EO role. Weaver et al. did not assess the effectiveness of the ethics and compliance program or the EO role.

Treviño, den Nieuwenboer, et al. (2014) conducted a qualitative, grounded theory study using a sample of 40 EOs from a vast pool of U.S. organizations and industries. Their findings demonstrated that EOs were high-level law-abiding individuals responsible for creating and maintaining an ethical environment. Yet, little is still known about the experiences of those performing the role.

Another significant impact on an EO's effectiveness is the organizational hierarchy and where the EO is placed within that structure. The placement within the leadership reporting structure is a crucial challenge relevant to EO effectiveness (Parsons et al., 2019). The cost tradeoff is one of a *pay me now or pay me later* for many organizations that had the potential to be penalized for misconduct.

Evidence in the literature supports the EO's role as reporting to the board of directors directly to ensure the chief ethics officer does not negatively influence ethical actions and information reported to the board (see, for example, Gnazzo, 2011; Hoffman, 2010; Hoffman et al., 2008). However, some research supports placing the EO role

within the legal department of an organization even though this may create a conflict of interest—one where the legal emphasis is to protect the leadership at all costs (DeMott, 2013; Matin, 2015). The ethics emphasis was intended to develop an ethical culture that adheres to the regulations regardless of the cost to the organization. A similar struggle has been found when the EO role is placed within the finance department of an organization (Hoffman & Rowe, 2007).

Hoffman and Rowe (2007) explored the EO reporting structures, noting the most significant responsibility of the EO is to assist executive-level leaders with ethical advice in corporate strategizing and decision-making. Usually, the EO is placed at the vice president level and is often responsible for other significant day-to-day duties. Reporting structures have a built-in conflict of interest when the EO reports directly to management and not to the board of directors. This conflict adds pressure to yield modified behavior. Loss of credibility and impairment of judgment and effectiveness are consequences of the EO not reporting directly to the board of directors.

Hoffman and Rowe (2007) found that if the EO reported to the management of the legal department, the emphasis became focused on legal decisions; reporting to finance management placed the focus on the organization's financial performance. EOs must be independent of senior management to be effective. Hoffman and Rowe noted that a study done in 2004 on Fannie Mae's ethics and compliance program found that 20% of EOs reported directly to the board of directors. Reporting directly to the board of directors allows the EO to operate independently.

*EO Effectiveness*

The effectiveness of the EO, who has the "responsibility of overseeing adherence to compliance and corporate values" (Potts & Matuszewski, 2004, p. 178), is dependent on the degree of integration within the organizational culture and leadership team structure. According to Potts and Matuszewski (2004), the effectiveness of the role correlates directly with the amount of respect received for the role from the organization and its top executives. The placement of these responsibilities is irrelevant and best suited for another duty-assigned arrangement if the role is merely a window dressing. Barry (2002) reinforced that many EOs struggle because their effectiveness was compromised due to a lack of empowerment and leadership support.

Initially, the effectiveness of the EO role faced significant challenges; today, those challenges continue to increase the importance of adjusting hiring practices and selecting the best candidates for the position (Murphy, 2002). Those challenges are legal risks, organizational structures, staffing levels, and needed job skills. EOs must also be focused on the legal impacts, as compliance needs to be effective. EOs need to be knowledgeable in labor and union contract terms and, in some cases, foreign labor laws to be effective.

The EO's effectiveness depends on the relationships built with executive-level leaders across the organization (Murphy, 2002). Discovering and reporting wrongdoing could often lead to difficulty for the EO, depending on the organizational reporting structures and management's willingness to address misconduct. If this reporting of

wrongdoing conflicts with the company's interests, meaningful relationships could be jeopardized, therefore hindering the effectiveness of the role.

Millions of dollars spent yearly on reinforcing ethical conduct provided little to the ability to measure the impact of EOs on ethical decision-making and influencing executive-level leadership behavior. According to DeMott (2013), the fact remains that there is still limited literature on the role, measurements of the role's effectiveness, and the degree of influence the role has on executive-level leadership behavior. Questionable corporate conduct continued despite the continued financial investment in corporate compliance and ethical oversight. At the same time, little formal training was offered to prepare those serving in the role of EO to influence executive-level leadership behaviors. The EO function was designed to steer training programs, hotlines, and policy adherence audits, and to detect infractions and inform executive-level leaders of ethical misconduct (Adobor, 2006; Gherghel, 2010; Hogenbirk & Dun, 2020; Martin, 2015; Treviño, den Nieuwenboer, et al., 2014).

Potts and Matuszewski (2004), drawing on years of professional experience, addressed the need for corrective measures to hold organizations ethically accountable by reviewing the ethical struggles of the U.S. Olympic Committee, citing events from 2002. Potts and Matuszewski emphasized that good ethical practice must start at the top, where executive-level leaders should be held to higher standards. These authors cited that "fixing the rules is not fixing the problem" (p. 177). They stressed that an ethics program must integrate into the organizational culture to be effective. Further, this integration would not be possible without an EO to oversee the corporate atmosphere. Potts and

Matuszewski acknowledged that the EO had little influence on executive-level leadership behavior. While these authors recognized a critical need to have a good ethics program and an influential EO to oversee the ethical environment that could help prevent corruption before problems occur, they offered no approach to assess the program's effectiveness or EO effectiveness.

According to Gnazzo (2011), inauguration of the EO role usually occurred following a series of violations and as an outcome of regulatory penalties. Gnazzo outlined the duties of the role. Further, he demonstrated the tug-a-war between executive leadership, the corporate legal counsel, and the EO in an understanding and recognition of where the responsibility of ethical organizational oversight resided. Gnazzo emphasized an effective EO should provide a structure for employees to be productive in their job duties without worrying about protecting the interest of stakeholders. Gnazzo posited that consideration of the EO's effectiveness could not occur until executive leadership places a higher value on ethics over profit. There was no approach offered to measure the effectiveness of the EO.

Divers (2015) explored the definition of the word "effective" and asked how the ethics and compliance program and the EO could be effective if the expectations, although defined, are loosely implemented and continue to change. She emphasized that the "ambiguous and evolving standards" (p. 63) are challenging effectiveness in the real world.

Weber and Wasieleski (2013) reviewed the literature to evaluate the current state of ethics and compliance programs within the United States. They highlighted six past

studies to provide an in-depth understanding of corporate ethics and compliance programs. These authors did not focus on the effectiveness of the EO. Instead, they focused on the ethics and compliance program trends, comparing results from similar studies conducted in 1999 to their research conducted in 2010. Their 2010 findings demonstrated upward trends toward comprehensive ethics initiatives and recognition of the EO's role as a critical element of the ethics program. Weber and Wasieleski stressed the need for greater insight into corporate ethics' effectiveness. They emphasized a requirement for further understanding of ethics training and the challenges of external factors on the ethics program's effectiveness and the EO's role in reinforcing the need for higher standards that include executive-level leadership behavior, regulatory pressures, and industry expectations.

## Research Approach

I did not find studies emphasizing the actual lived experiences of EOs, and how their strategies for guiding executive-level leadership behaviors differed from other levels across the organization. Yin (2014) said the research question being asked is most significant when selecting a research method. Questions that ask how, what, and why are by nature exploratory where the researcher should use a qualitative approach. Likewise, a quantitative approach is more appropriate for questions that ask how many and are supported numerically. The research question for this study asked, How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? Logically, this qualitative research explored the perceptions of the EO's

lived experiences through the principles of ethical leadership that might benefit academics and practitioners alike.

**Phenomenological Research**

Moustakas (1994) advised that phenomenology is the research method choice when the researcher wants to describe perceptions, senses, and one's awareness of an experience. Englander (2012) stated that the phenomenological approach aims to answer the research question presented as what is the meaning of the experience. Smith et al. (2009) said that phenomenology is an approach to studying lived experiences by looking at the interest from the experience of a human being. Gill (2014) illuminated that the phenomenological approach is best when the phenomena being studied is the perception of someone's conscious experience. Further, an interpretive approach lends well when the goal is to explore an individual's experience explicitly. Gee et al. (2013) recommended studying the conscious experience of those who lived the experience to concentrate on the individual's description of the experience and perceptions.

Husserl and Heidegger were pioneers in establishing descriptive and interpretive phenomenology methods of qualitative research (Lopez & Willis, 2004). Husserl believed that seeking an understanding of those components that motivated human actions influenced by one's perceptions was essential and had value to science. He posited that the descriptive approach of bringing out the essentials of lived experiences related to a specific group was needed. Husserl assumed that the researcher should have limited personal knowledge of the lived experience being studied to minimize personal

biases. Further, Husserl believed that study outcomes should represent one correct interpretation of the participants' experiences through generalizations.

Whereas Heidegger advocated for an interpretive method that was founded on hermeneutics. Hermeneutics meant looking for meanings embedded in everyday life experiences (Lopez & Willis, 2004). Heidegger's foundation was to find clear, interpretive meanings hidden in human experiences and relations. He posited that one's sense of reality is influenced by the world in which one lives. The interpretive notion of this method is to interpret the meanings of those narratives provided by participants as they relate to the context of the phenomenon being studied. I took an interpretive approach to understand the meanings of EOs through perceptions of their influence on executive leadership ethical behavior. Therefore, I utilized Smith's IPA (Smith et al., 2009) approach.

**Interpretive Phenomenological Analysis**

Mayoh and Onwuegbuzie (2015) said that an interpretative approach emphasizes the interpretations of life when the researcher wants to capture the essence of human behaviors from a discovery-oriented viewpoint. The basics of the IPA approach, by definition, is the exploration of how others make sense of their experiences without attempting to manipulate and categorize those experiences (Smith et al., 2009). The IPA approach was appropriate for this study to explore how those in the EO role perceived the situations they faced and how they made sense of the complexity of their personal experiences.

Smith et al. (2009) introduced the IPA approach in 1996 and argued the approach was centered on psychology advocating a qualitative methodology. Smith stated that the IPA's beginnings stemmed from phenomenology, hermeneutics, and idiography (Smith, 2011). Initially, the primary use was health psychology and illness experiences, however. There has been an increase in the use of the IPA approach in non-psychology research. According to Roberts (2013), the IPA approach relies on observing the everyday flow of lived experiences allowing participants to describe their experiences. This approach explores the influences of behaviors as the participant perceives them. Further, (Smith et al., 2009) described the IPA approach as a "double hermeneutic" (p. 3) approach offering a dual role for the researcher since the researcher tries to make sense of the participant's responses while the participant tries to make sense of their experiences.

In an IPA study, research questions are open and exploratory (Smith et al., 2009). The thought process should not be about the generalizability of findings; instead, the research should focus on theoretical transferability. Samples should be derived using a purposeful selection process to derive a homogenous sample to facilitate gaining insight into a specific experience. Participants are selected not based on their ability to represent a population but on their ability to provide a perspective of phenomena. Sample sizes depend on the commitment of the study and the desired depth of insight into the phenomenon being studied.

In 2009, Smith (2011) conducted an extensive literature review of the IPA approach using three databases: PsycINFO, Medline, and Web of Science, covering 1996 to 2008. Much of this literature was generated from the UK, with the first paper outside

the UK being published in 2002. Smith noted that the UK base of literature on IPA was not surprising since the UK was primary in developing qualitative psychology literature at that time. Further, he found that the largest use of the IPA approach fell within health psychology and counseling psychology. His focus was on assessing the quality of the approach to develop a guide and identifying characteristics to distinguish between acceptable and non-acceptable IPA papers. Smith recommended expanding the application of IPA to non-psychology disciplines. He also encouraged the use of IPA within mixed-methods studies to facilitate an increase in the comparisons between quantitative and qualitative research. Lastly, Smith recommended emphasizing preventative health behavior by increasing the volume of research in this area using the IPA approach.

Although Smith (2011) presented the results of an extensive literature review on the IPA approach and did not document an actual study with this paper, I related his presentation and recommendations to my research, which provided the opportunity to expand the body of knowledge on the qualitative IPA approach and execute his core features to produce of a high-quality IPA study since my research was conducted outside the UK on a non-psychology discipline. My research objective is to evaluate the EO's perceptions of their effectiveness in influencing executives' ethical behavior within organizations with operations in North America with an established ethics and compliance program.

Cooper et al. (2012) applied the IPA approach to explore the student experience of learning qualitative research techniques. These authors noted that most of the research

on student experience in learning qualitative methodologies was conducted by pulling the sample from a single academic field and a single institution. Cooper et al. used the IPA approach to expand their knowledge on the topic to explore the lived experiences of six students (three men and three women) from various academic fields. They identified key themes and gained insight into data that could improve qualitative research course instructions. This approach was like my plan, which was to use EOs from organizations with operations in North America to gain insight into perceptions on the influence of their role on executive-level ethical behavior that could lead to improved training programs for EOs and executive leaders.

Cooper et al. (2012) found that the learning experience was emotional for students, often introducing anxiety because students lack experience with qualitative methods. Further, stories play a central role in learning, where interview stories are essential to data collection and analysis processes. Lastly, the students use their prior experiences and knowledge to make sense of their current learning events. These findings support previous research. Cooper made several recommendations. The practice of qualitative methods should be included earlier in coursework to reduce anxiety, confusion, and frustration. Also, instructors need to recognize that students' life experiences influence training events by helping students make sense of their roles within a qualitative setting.

Patel et al. (2015) used IPA with a case study, an idiographic method, to make sense of the effect of failure on the emotional well-being of a small sample of high-achieving UK medical school students. A series of semi-structured interviews were used

to capture the student's perceptions as they made sense emotionally and within a social context of the experience of failure. A cross-case analysis was applied to find common themes across participants. Patel et al. found that participants struggled with emotional trauma, ill health and depression, and a sense of social isolation after experiencing the phenomenon of failure in the medical program. These authors recommended future research explore the success rates of students struggling with personal, social, and mental health issues while participating in stressful, intense training programs and simultaneously participating in enhanced remediation support events.

## Summary and Conclusions

A review of the literature demonstrated a linkage between establishing an EO role within the corporate organizational structure and executive-level ethical behavior. I found research on corporate ethics and compliance programs, the EO role, and ethical leadership theory in the research literature. There is a large body of literature on various requirements and regulations governing the compliance and ethics program. There is research on the intersection of *ethical leadership theory* and *the effectiveness of the EO role*. Also, I found research defining EO characteristics, requirements, job duties, placement within organizational reporting structures, and challenges they experienced. Most research describes the characteristics and uses quantitative methodologies to provide an understanding of the role. Of the research I found on ethical leadership and the EO role, most were related to the overall compliance program, illuminating the role as a check box item critical to satisfying the regulatory requirements. None specifically addressed the ethical leadership strategies used to enhance the effectiveness of the role,

thereby supporting the existence of a gap in the literature on the ethical leadership

strategies used by EOs to influence the ethical behavior of executive-level leaders.

My literature review generated three major themes in the literature related to the

evolution of the EO role, with highlights on past, current, and future challenges in the

effectiveness of the EO in influencing executive-level leadership behavior. The first

theme highlights that the effectiveness of the EO is based on the balance between

compliance with laws and regulations, protecting executives and the organization's

reputation, and continuing to achieve corporate profitability (Gnazzo, 2011; Murphy,

2002). The second theme describes the inconsistencies in the role's definition and scope

(Hogenbirk & Dun, 2020); and the power struggles within an organization that impact the

reporting structures, authority, and effectiveness (DeMott, 2013). The third theme was

that the duties and skills required of the EO span across many disciplines; and need in-

depth knowledge of the laws and regulations, strong interpersonal skills (Mazur, 2017),

and insight into organizational processes and strategies (Miller, 2017).

Further, through this literature review, I found that the dimensions of ethical

leadership theory emerged from the attributes of transformational and charismatic

leadership (Brown et al., 2005) to define business ethics and establish a framework of

right vs. wrong (Brown & Mitchell, 2010). Essential components of ethical leadership, as

described by Brown and Treviño (2006), are deeply seated in honesty, integrity, and

trustworthiness of the person.

One significant gap in the research is that minimal scholarly knowledge exists

about the effectiveness of, and strategies used by the corporate EO outside the basic

constructs of the corporate compliance and ethics program framework to influence

executive-level leaders' ethical behavior. My study may offer a new lens by exploring the

perceptions of those serving in the EO role to extend the body of knowledge regarding

their perceptions toward influencing executive ethical behavior within the corporate

culture.

       In Chapter 3, I justify the rationale for selecting the IPA as the research method

for this study. I describe how I proposed to conduct this study, the participant selection

process, the steps I used to protect those participants, the data collection process, and the

ways I ensured my research results were valid and trustworthy. Further, I demonstrate the

alignment of my problem statement with the proposed research methodology. Lastly, I

describe how my research methodology may help enlighten the understanding and

contribute toward closing the knowledge and understanding gaps of the EO's influence

on executive-level ethical behavior.

Chapter 3: Research Method

The purpose of this qualitative IPA study was to explore the lived experiences of EOs regarding their interactions with executives. I collected data exploring EOs' perceptions of their effectiveness within organizations operating in North America that have an established ethics and compliance program. According to Smith et al. (2009), incorporating ethical behavior influencers into executive-level management principles could lead to the ability and readiness of practicing professionals to act responsibly. Expanded insights could advance understanding of ethical decision-making when professionals are presented with a dilemma. I conducted an IPA study to increase understanding of ethical leadership strategies used by corporate EOs to influence executive-level leadership ethical behavior. The IPA approach provides the ability to gain insight into the innermost understanding of participants' lived experiences and their meanings (Alase, 2017).

In this chapter, I share the research design, methodology, research question, and the rationale for selecting this research approach based on my research question. I discuss research methods I considered but opted not to use and why. I discuss my role as the researcher. I describe the participant selection and recruitment logic used, the planned instrumentation for data collection, my pilot study details, and how the data analysis occurred. Lastly, I discuss how I planned to ensure the trustworthiness of my study related to credibility, transferability, dependability, confirmability, and ethical procedures before summarizing of the chapter.

**Research Design and Rationale**

The research question for this study asked, How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? The phenomenon for this study was EOs' perceptions of their experiences and strategies and their effectiveness in influencing executive-level leadership ethical behaviors. Leung (2015) emphasized that nonnumerical information should be used to answer how, when, who, why, and where research questions. In contrast, Moustakas (1994) advised that a phenomenological research method is used when the goal is to capture the perceptions, senses, awareness of an experience, and the meaning of the experience from those who lived it. I used a qualitative IPA methodology to capture EO perceptions of their influence and effectiveness.

Although there is a plethora of research in the literature on establishing and maintaining corporate ethics and compliance programs and the role of the EO (see, for example, Burdon & Harvey, 2016; Stevens, 2008; Treviño, den Nieuwenboer, et al., 2014; Weller, 2017), there is a gap in the research on the understanding of the effectiveness of the EO to influence the behaviors of executives through the lens of ethical leadership theory. According to Gill (2014), the nature of the research question, the researcher's philosophy, and the study outcomes drive the selection of a methodology. A qualitative approach is more appropriate when the quest is to explore participants' experiences, perspectives, interpretations, and meanings from their viewpoint (Astin & Long, 2009).

Treviño, den Nieuwenboer, et al. (2014) said researchers studying business ethics and the critical role of the EO are only beginning to "use qualitative methods to advance the understanding of ethics" (p. 203) within corporate cultures. They found that previous research has relied primarily on quantitative surveys and laboratory approaches to close the gap in knowledge, which was not effective for understanding the role from a behavior lens. Further, little is known about the experiences of the actual work done by EOs to influence the ethics of executive-level leaders. Treviño, den Nieuwenboer, et al. also noted that assessing the effectiveness of an EO is a challenge.

Lopez and Willis (2004) stressed that many researchers using a qualitative approach struggle because the clear philosophy of the research goal is ambiguous. A phenomenological approach is used when the fundamental goal is to examine human experiences. For this reason, I selected a qualitative phenomenological research approach to capture the perceptions of those who serve in the EO role within organizations that operate in North America.

I considered five qualitative approaches for this study. The first method I considered was the case-study. The case-study approach focuses on a single unit observed at a single point in time to generalize the understanding to a large class of the population (Baskarada, 2014). The case-study researcher needs to be experienced with the subject matter; otherwise, the learning curve could be unsurmountable, leading to time wasted and misunderstanding the results. I did not choose a case-study research approach because I was seeking commonalities in ethical leadership strategies used by EOs from numerous organizations rather than exploring a single case.

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The second method I considered was the ethnography approach. Cunliffe and Karunanayake (2013) characterized the ethnographic approach as one that develops rich context and detailed accounts of a community's daily life. A researcher must spend extended time in the field, becoming immersed in the lives of the study participants. By spending extended time with the participants, a researcher has the potential to gain a greater understanding of the phenomenon while risking an unwanted reaction to the participants' responses and actions. Ethnography was not appropriate for this study.

The third method I considered was grounded theory. According to Jorgensen (2001), a grounded theory researcher seeks to construct theory by systematically gathering, synthesizing, and analyzing data. I did not choose a grounded theory research approach because I sought commonalities in the ethical leadership strategies used by EOs by examining perceptions of their influence on executive behaviors; I was not attempting to construct theory.

The fourth method was the narrative approach. McAlpine (2016) stated that the narrative approach captures personal stories and retells those participants' stories, accounting for how the storytellers made sense of their lived experiences. Muylaert et al. (2014) stated this approach is used to investigate and recreate an event from participants' viewpoints. I did not choose the narrative approach because I was seeking commonalities in the ethical leadership strategies used by EOs by exanimating perceptions of their influence on executive behaviors.

**Role of the Researcher**

Alase (2017) described the researcher in a phenomenological study as one who investigates and interprets the participants' lived experiences. The essence is to amplify those lived experiences by allowing participants to share freely. The researcher must assure the participants that their stories have not been distorted. Gill (2014) described the researcher in a phenomenological study as an instrument listening to the participants and capturing their reflections of the phenomena experienced. Giorgi (2012) said the researcher must resist interjecting their prior experiences into participants' responses. According to Roberts (2013), the researcher seeks to understand the participant who is trying to understand the world around them. Alase stated that the researcher is an interpreter, interpreting the meaning of participant's lived experiences.

Alase (2017) characterized the researcher conducting an IPA study as one performing a dual role. According to Smith et al. (2009), that dual role is "both like and unlike the participant" (p. 35). The researcher acts as a *meaning-making* participant by drawing from their own experiences to make sense of the environment surrounding the phenomenon. Alternately, the researcher acts in a *sense-making* non-participant role when absorbing the essence of the phenomenon through participants' lenses from the things said during interviews.

My responsibility as the researcher was to fulfill this dual role. First, I adopted an insider's perspective to feel what it is like to experience the phenomenon from participants' views. Second, I took an outsider's stance focused on asking questions, puzzling over participants' comments, and making sense of participants' responses.

During the interview process, I followed the recommendations of Smith et al. (2009) by showing empathy and working to put participants at ease while establishing a rapport that allowed them to share freely. Further, I immersed myself in the interview conversations, showing disciplined attention to participants' accounts and perceptions of the phenomenon.

In addition to being a doctoral candidate, I am a leadership professional with over 35 years of experience in applications development, information technology, project/program/portfolio management, and executive leadership. I set aside any prejudgments and preconceived ideas about the effectiveness of EOs to ensure that participant responses were accurately captured and interpreted. My experience includes quality management roles, like governance and adherence to processes, procedures, and compliance with government laws and regulations. However, I did not anticipate any conflict of interest in this researcher role because my professional experiences have not included the role of EO or EO duties. To provide transparency, I divulged my professional background and experiences to study participants during the selection phase of this study.

## Methodology

My methodology was based on the research question: How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? I planned to select participants for the study based on specific criteria, to collect data through semi-structured interviews, and then to analyze the data.

**Participant Selection Logic**

The population consisted of individuals employed by organizations with operations in North America who are responsible for the oversight of the compliance and ethics programs and customarily served in the EO role. The target population was individuals who were members of the ECOA, SCCE, SOC, or HCCA and served in an EO role within an organization with an established compliance and ethics program. By sampling from this group, I conducted an exploration among people with similar experiences and roles to allow for relevant themes to emerge and meaningful data analysis to occur.

According to Koerber and McMichael (2008), quantitative and qualitative participant selection techniques differ based on study biases and generalizability opportunities. Koerber and McMichael noted differences between *probability* and *non-probability* techniques in qualitative sampling methods. The non-probability techniques (purposive, convenience, and snowball) are best used when participant selection is based on the expectations that participants possess the characteristics, knowledge, and experiences necessary to answer the questions about the phenomenon being studied. In this case, a higher level of confidence that the sample represents the population of interest is essential. A non-probability technique is used when probability samples are not obtainable, or representation confidence levels are not as important.

Qualitative selection techniques, as described by Astin and Long (2009), characteristically identify who, what, and when. The emphasis is on defining (a) who to talk to by defining the participant's characteristics, (b) within what situations to observe

behavior based on an event that participants have in common that is observable, and (c) a place and time.

Smith et al. (2009) stated that an IPA sample should consist of participants who are oriented to a particular experience. This selection process is based on their representation of a particular perspective of the phenomenon under study. Roberts (2013) stated that a homogenous purposive sample is required to allow themes to be realized from a group that shares a common experience. According to Smith et al., a homogeneous sample is important to ensure the sample and research question are aligned meaningfully. Alase (2017) said that a homogenous participant pool obtained through purposive sampling allows a researcher to better gauge participant perceptions, leading to a better understanding of participants' overall perceptions of their lived experiences of the phenomenon being studied.

During my review of the literature, I found examples of quantitative studies that used a purposive sampling approach with a target audience consisting of ECOA members (see, for example, Chavez et al. 2001; Morf et al. 1999). I was unable to locate examples of qualitative studies using the IPA methodology and a sample consisting of EOs. However, several qualitative studies demonstrated an effective use of purposive sampling.

Stansbury and Barry (2007) analyzed corporate ethics programs in the context of control systems looking at the variations between coercive and enabling controls. They considered the impacts on the ethics and compliance program effectiveness in terms of an organizational political frame and an individual moral frame. Stansbury and Barry

summarized that an organization's ethics program consists of a collection of control

mechanisms (legal, moral, and behavioral expectations) that when used can yield

coercive and enabling control mechanisms. They stated that the ethics program aspects

must be used as tools rather than weapons to be effective.

Treviño, den Nieuwenboer, et al. (2014) conducted a qualitative study using a

combination of snowball and theoretical sampling procedures to facilitate 40 semi-

structured interviews of ethics and compliance officers (ECO). They found that even

though the ECO were responsible to help their organization navigate the external

legitimacy struggles, they themselves were met with major legitimacy struggles from

within their organization. Further, their findings demonstrated that the role of the ECO

must be legitimatized withing an organization to allow the ECO the ability to do their job.

Khaled and Gond (2020) conducted a qualitative study using a purposive

sampling approach focusing on multinational corporations that are formulating ethical

tools in place and the relationship between external regulations and the design of those

ethical tools. Twenty-six semi-structured interviews were conducted with those

responsible for the tool development efforts. They found that the effectiveness of the

ethical tools development and the factors that influence the development processes

continue to be overlooked within a multinational corporation setting.

Smith et al. (2009) acknowledged there was no right answer to determining

sample size for an IPA study. He recommended keeping the sample size small, yet large

enough to ensure sufficient and meaningful similarities and differences among

participants are achieved without overwhelming the researcher in the amount of data

collected. Mason (2010) stated that sample sizes should ensure that most participant

perceptions are uncovered but not too large to superfluously introduce repetitiveness in

the collected data.

I applied a purposive sampling selection approach based on the definition of

Smith et al. (2009). A secondary snowball sampling selection approach was used to

achieve the desired sample size and saturation. I posted frequently on LinkedIn using an

account set up for my study, providing the selection criteria and a request for those

interested in participating to contact me on LinkedIn. Further, I searched LinkedIn using

my candidate criteria to find EOs to contact directly. Also, I asked for referrals from

those potential candidates whom I could contact to invite additional participants. My plan

was to use a first-in process to select participants. Each potential participant's

qualifications were evaluated and the initial 12 candidates who met my criteria and

agreed to participant were selected as my research sample.

A second selection validation step included evaluating participant's placement in

the organizational reporting structure. I sought participants who had served in a role

responsible for overseeing their organization's ethics culture. It was ideal for consistency

if their corporate title was *corporate ethics officer*, but it was not required. My

expectation was that the participants had similar roles within their organizations to

support the organization's governance of the compliance and ethics functions. Those

leaders who fell into these job titles in their current or previous positions created a

homogeneous sample: ethics officer, chief ethics officer, chief compliance officer, chief

compliance and ethics officer, chief integrity officer, chief trust officer, executive vice

president, vice president, senior director, or director.

Mason (2010) suggested a qualitative study of five to 50 participants. He noted

few new insights come after 20 or so participant interviews have occurred (i.e.,

saturation). My initial sample size was 12 participants. This sample size was within the

range bounded by 3 to 6 identified by Smith et al. (2009) and Mason's ceiling of 20. I

postulate that my sample of 12 would enable me to capture meaningful themes despite

the heterogeneity of the population represented by the participants, such as industry,

company size, variations in reporting structures, the expertise of the EO, and maturity of

the ethics program; and, that saturation could be achieved with 12 participants.

According to Mason (2010), saturation occurs when *new* data are no longer being

discovered during data collection. Dworkin (2012) agreed with Mason that saturation

occurs when the data collection activities no longer spark new data or relevant insights.

Mason said that saturation should be used to determine sample size. However, the point

of saturation is difficult to identify and uncovering new themes could continue yet may

not add value during data analysis. Koerber and McMichael (2008) recommended that

the researcher continuously examine the data to judge if all the categories are full enough

to provide an adequate basis for saturation and analysis.

During the data collection phase, I selected a homogeneous sample that offered

some diversity to ensure each participant was allowed to offer individual level

perspectives during the interviews. The data analysis approach with an IPA study

requires many in-depth iterations of reviewing the interview transcripts and categorizing

the themes as they emerge (Smith et al., 2009). I continuously reviewed interview transcripts and field notes to look for richness of the data versus quantity of the accumulation of the data. If I had found that interviews with my initial 12 participants did not yield saturation, I planned to add participants by soliciting potential candidates from LinkedIn using the process outlined in the recruitment and participation section while doing an in-depth transcript review after each new participant interview session to determine if saturation has occurred. If I had reached 20 participants without yielding saturation, I planned to assess the value of any potentially new data that could be discovered with additional participants before continuing.

**Instrumentation**

I planned to use multiple instruments to facilitate my data collection activities. My primary collection tool was an in-depth semi-structured participant interview using the interview protocol (Appendix C). Further, I used researcher field notes and document reviews to supplement the collection of data. I triangulated the interview transcripts, my field notes, and document reviews to check the credibility of my findings and verify my interpretations of the data. All interviews were digitally recorded.

*Interviews*

Smith et al. (2009) recommended using an interview protocol, asking probing open-ended questions, and being flexible enough to explore all aspects of the participant's experiences. Smith et al. emphasized the importance of not interpreting participant responses while they are being shared.

My instrument was implemented through participant interviews either in person or with video technology using Zoom to simulate an in-person connection. Initially, my aim was to engage in a conversation with a purpose by being an active listener and allowing participants the latitude to think, speak, and be heard. This insight was emphasized by asking interview questions that allowed participants to describe the inner-most personal meanings of their experiences while serving in the role of EO without withholding critical details of those experiences. It was essential to the success of the data collection process that participants were candid and transparent about their experiences.

I transcribed the audio recordings of each interview for data analysis and to verify accuracy by sending the transcripts to the participants for member-checking. Follow-up interviews, although not anticipated, were available if necessary to clarify the initial participant responses.

According to Jacob and Furgerson (2012), the interview protocol should be a set of questions that guides the researcher through the dialogue with the participant. My interview protocol (Appendix C) consisted of open-ended questions and preconstructed prompt questions for use with the various participant responses. I began with a broad question to allow the participant to recount a descriptive experience to put them at ease and comfortable engaging in the conversation. The first part of my interview protocol focused on participant demographics. The second part emphasized the interview questions relating to the participant's experience as an EO and their interaction with executive-level leadership.

The interview questions were neutral and open-ended, not leading, and consisted of a main question with constructive prompts for follow-ups. My questions used inviting phrases such as "*tell me about*" as recommended by Jacob and Furgerson (2012). They stated this approach keeps the questions general allowing the individual participant to take their responses in a direction aligned with their experiences, ideas, impressions, and concepts. Jacob and Furgerson said that this approach helps the researcher to keep the protocol questions from becoming too structured, complicated, detailed, or difficult to answer.

My interview protocol was evaluated during my pilot study before being used with my main study. I enlisted the support of an unbiased research assistant to check my questions and analyze the data to ensure I refrained from introducing any bias in my questions, supportive reactions to participant comments, or ignoring contrary findings. This approach reduced my personal biases. To ensure quality and validity, I employed member-checking with participants, by having participants review the transcripts of their interview for accuracy and allow for corrections before the final write-up was completed.

### Field Notes

Field notes assist the researcher to capture information that is not present on the interview audio transcript. These functions include sights, sounds, the researcher's reflections, and identification of bias (Phillippi & Lauderdale, 2017). Field notes in qualitative studies aid in capturing thick, rich descriptions from the study context and participant interviews as they occur and are useful for secondary analyses while advancing knowledge on the topic through the shareability of the notes.

I took small, keyword-based notes during the interview to assist in clarifying my understanding of participants responses for accuracy or identifying areas that required further clarification later. During the interview it was important to allow the responses to flow naturally and uninterrupted. However, it was important for me to note keywords or alternate topics in their responses for follow-up probing when the dialogue reaches a natural conclusion (Smith et al., 2009). Also, I captured notes on any observations of body language or tone presented by the participant. These notes assisted with jogging my memory of important aspects later during data analysis.

### *Document Review*

I reviewed several industry survey documents relating to ethics and compliance programs. These documents allowed me to have a sense of the EO role, demographics of ethics and compliance programs, and perceptions of organization leaders. One document was the 2022 LRN Ethics and Compliance Program Effectiveness Report on underpinned values, challenges, and effectiveness of ethics and compliance programs (LRN, 2022). Another document was the 2016 LRN Ethics and Compliance Program Effectiveness Report that identified key behaviors that could strongly correlate to a healthy ethical culture (LRN, 2016).

### **Pilot Study**

According to Kim (2011), a pilot study is a smaller study that simulates the main study steps prior to conducting the main study. The intent is to ensure the methods, ideas, and instruments work as desired when put into practice with the main study. My approach with this pilot study was to simulate the steps I planned to use with my main

study to conduct each participant interview, capture an audio-recording of the session, and review the interview session transcriptions with the study participants for accuracy. This approach was beneficial, giving me practice interviewing EOs and then to apply adjustments if needed to my interview protocol and session techniques.

I planned to conduct a pilot study to validate the appropriateness of my questions in the interview protocol and to ensure the data properly aligned with the research question and overall study intent. My pilot study participants were to consist of two hand-picked professional colleagues who currently function in the EO role within organizations that had operations in North America with an established compliance and ethics program. I shared the Participant Recruitment Letter (Appendix A) and Participant Consent Form (Appendix B) with the pilot study participants.

Smith (2015) suggested transcribing the first interview before moving forward with additional interviews, to review the interview protocol, interview strategies, and session techniques. This intermediate step allowed me to focus on my presentation of the interview protocol, the time needed to conduct the interview, my abilities to capture participant responses in my field notes, and the audio taping of the session. By conducting a pilot study, I ensured my interview questions generated an open dialogue and facilitated the opportunity to ask probing questions following the participants initial question responses. The pilot study provided the opportunity to identify adjustments needed to improve my approach during the interview session. Also, I ensured the time needed to complete the interview session was sufficient before engaging the participants

of the main study. Lastly, the pilot study was intended to reveal where I needed to adjust my instrument prior to conducting my full study.

**Procedures for Recruitment, Participation, and Data Collection**

The following two subsections provide details outlining the recruitment, participation, and data collection processes.

*Recruitment and Participation*

According to Alase (2017), selecting the right participants can be tedious but critical to collecting rich, accurate data. I used a purposive sampling strategy to recruit participants for this study. I began the recruitment process using LinkedIn by developing a special profile designed only for my research. I posted on LinkedIn using this profile making requests and socializing the selection criteria to find potentials who might be interested and asking them to contact me on LinkedIn. I conducted searches on LinkedIn using my candidate criteria to find EOs to contact directly. Further, I located and joined relevant LinkedIn groups to solicit participation from my target population, EOs of North American corporations. I promoted my research and extended invitations within these specialty groups. If needed to reach my target number of participants or to reach saturation, I used snowball sampling to invite additional participants using the same process on LinkedIn. I asked for referrals from those initial potential candidates whom I contacted. Then I contacted those referred.

I planned to use a first-in process to select participants. Each potential participant was evaluated through an email exchange to verify they met the criteria before I scheduled the interviews. I selected the initial 12 candidates who met my criteria and

agreed to join as my research sample. Once potential participant candidates were

identified, I planned to solicit individual participation via email to each candidate and

included a recruitment letter (Appendix A). The recruitment letter outlined the purpose of

the study and identified the demographic criteria needed for participants. Informed

consent is essential to the ethics of research to protect the autonomy of human subjects

(Bloomberg & Volpe, 2008). A Participant Consent Form (Appendix B) accompanied the

invitation letter for those who agreed to participate. If a participant candidate agreed to

participate in the study, the individual was asked to respond to my email with a message

of "I consent." This consent notification began my process of scheduling a one-on-one

interview.

### *Data Collection*

The following data collection steps were planned for the initial 12 interviews.

Each 45- to 60-minute virtual interview session used the same interview protocol. I

planned to start the dialogue by thanking the participants for their participation and

elaborate on the purpose of the study. Continuing, I planned to remind participants that

their identity would be protected, and their participation was voluntary. Also, I planned to

remind them they can decline or stop their participation at any time without negative

impacts. Much of the session consisted of asking demographic and interview questions

while engaging in a semi-structured exchanges allowing the participant to talk as I

actively listened. I used follow-up or prompt questions if needed to dive deeper into

participants' responses.

I planned to wrap up the interview session by informing the participant that a transcript and interview summary will be sent to them for review to ensure accuracy of our session notes. I planned to mention that a short follow-up telephone call may be needed to clarify information from the initial interview session. Lastly, I planned to use the snowball sampling approach by asking them for references to other EO colleagues who might be interested in participating. I aimed to conduct and record the interviews virtually using Zoom or Teams. If a participant could not access Zoom or Teams, the participant was not included in the study.

**Data Analysis Plan**

The purpose of this qualitative IPA study was to explore the lived experiences of EOs regarding their interactions with executives. The study was guided by one research question: How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior?

Qualitative data analysis is rigorous and iterative requiring flexibility and a focus on the meanings based on participants' expressions (Roberts, 2013; Smith et al., 2009). The intent is to understand the content and complexities found in the meanings of participant responses rather than in the frequency of repeated responses (Smith, 2015). Data analysis for the IPA methodology is an inductive, open-ended strategy that uses open-coding and axial-coding (Hauser, 2020). According to Treviño, den Nieuwenboer, et al. (2014) open-coding is the use of short-hand terms to label and categorize meaning units within interview transcripts. Axial-coding relates to determining relationships among the various categorizes identified with open-coding. I planned to use both open-

coding and axial-coding to develop a coding dictionary (or master list) of emerging

themes from my in-depth and iterative analysis of interview transcripts.

I planned to use a double hermeneutic process where the primary concern is

participants' lived experience and the meaning participants make of that experience

(Smith et al., 2009). The result of my subjective analysis of interview responses was an

account of how I thought the participant was thinking. Further, I planned to analyze the

transcript data from each of the participants. I planned to use the inductive, open-ended

strategy prescribed by Smith et al. (2009), which includes the following:

- Read and re-read the interview transcript from each participant session.

- Capture notes in an exploratory manner (potential themes, thoughts, etc.)
  to gain an understating of the participant's talking style, perceptions, and
  language used.

- Divide the text into meaning units producing a detailed comprehensive set
  of notes.

- Develop a coding dictionary to include the open-coding labeling of
  themes, a detailed definition of each, and various parameters of each.

These steps are iterative and occur multiple times on a single interview transcript

going deeper into the context with each review. Once the researcher is confident this in-

depth review is sufficient, the next interview transcript for the next participant occurs. As

the review of each transcript occurs, synthetization and clustering of meaning units or

aggregation of themes across all the interview transcripts should occur to identify a

master list of significant themes (Gill, 2014; Hauser, 2020; Smith et al., 2009).

There is a variety of software applications that can be used to assist with the coding of meaning units and produce text and images directly from the digital recordings (Smith et al., 2009). For my data analysis, I used manual coding of the printed hardcopies of the interview transcripts. I used Microsoft Excel to assist with data storage and organization of the analysis while providing space to add notes of non-verbal utterances, significant pauses, and participant response hesitations. Each question had an individual tab within the workbook which allowed me to capture statements, phrases, and keywords. Once statements were captured, I used categories (codes) to group similar statements into higher level categories (codes) and then refined those categories (codes) into themes. The plan was to use this method with my pilot study and my main study. My manual coding steps included the following process:

1. Review interview transcripts individually and iteratively.

2. Use Microsoft Excel to create individual tabs for each question to document statements, phrases, keywords, categories (codes), grouping themes, frequency of occurrences, and notes on key findings for each key question.

3. Begin the manual coding process:

    a. Use a logical, objective, process of capturing key information from the individual transcripts,

        i. Identify responses, statements, phrases, and keywords.

        ii. Assess the frequency of the occurrence of those responses, statements, phrases, and keywords.

    iii. Aggregate the statements at a higher level into groupings of categories

      (codes).

    iv. Identify key findings with the intent to answer the research question.

  b. Record all noteworthy responses, statements, phrases, keywords, by question

    by participant; assess after each interview for the purpose of assessing

    *saturation*.

4. Begin the process of aggregating responses, statements, phrases, and keywords across

  all interview transcripts.

5. Identify common or frequent responses assigning *codes* to each for grouping across

  all interview transcripts.

6. Record the frequency of how many participants mentioned these codes.

7. Some codes might be infrequent but important because they may be a discrepant case.

8. Group codes into categories by grouping similar or related codes into higher level

  categories.

9. Group categories into themes by grouping similar or related categories into higher

  level themes.

10. Identify the most important themes as key findings.

    Discrepant cases may be identified during the stage of connecting themes from

the analysis of the various participant transcripts (Smith & Pietkiewicz, 2014). These

discrepancies are those themes that do not fit well with the emerging structure or have

weak evidential basis. I planned to follow the Smith and Pietkiewicz example and drop

those themes from the final list if they do not fit or offer weak evidential basis.

**Issues of Trustworthiness**

In qualitative research, trustworthiness is an attribute researchers use to establish the validity and reliability of the study findings (Bloomberg & Volpe, 2008). Validity and reliability show credibility and rigor in qualitative research (Curtin & Fossey, 2007). There are four criteria used to ensure the trustworthiness of qualitative research: *credibility*, *transferability*, *dependability*, *and confirmability* (Shenton, 2004). These criteria demonstrate the trustworthiness of ensuring the findings came from the data rather than the researcher's predispositions. In each of the following sections, I describe how I planned for trustworthiness issues.

**Credibility**

Credibility, or internal validity, seeks to ensure the reality of the findings through an assessment that the measures represent what was intended (Shenton, 2004). I planned to execute the strategies of member-checking and triangulation. Member-checking engages participants to validate the correctness of the data collection and analysis with participants' experiences (Curtin & Fossey, 2007). Triangulation strengthens the study's validity by providing a cross-reference comparison of data while testing for consistency and increasing the accuracy and credibility of the study findings (Patton, 2002).

I planned to use Patton's (2002) data triangulation method by using multiple data sources (interview transcripts, field notes, and audio records of the interview sessions) to increase the accuracy and validity of the findings. Patton identified four types of triangulations (methods, sources, analysts, and theory). I planned to use a triangulation strategy by taking interview transcripts and my field notes to confirm my interpretation of

the material and ensure participant responses were accurately captured. Also, I planned to compare my results to the 2022 LRN Ethics and Compliance Program Effectiveness Report (LRN, 2022). This comparison strengthened the credibility of my findings by allowing me to draw upon similarities and reflect on differences.

The semi-structured interview with an audio recording of all sessions was to be used for all data collection activities. These interviews were to be conducted in a virtual setting introducing time, space, and individual differences. These differences allowed for looking at similar data to the same interview questions yet yielding variations based on each interview setting by the individual participant. This variation allowed the triangulation of themes that might emerge from the interview transcripts across all 12 participants. Therefore, there was method and source consistency. Further, I was the only researcher analyzing the data; therefore, analyst triangulation consistency occurred.

Also, I planned to conduct member-checking or spot-checking of the accuracy of the data through interviews. Member-checking was to be achieved by providing the interview transcripts to my participants, asking them to review and identify corrections, or acknowledging the accuracy of the data gathered during the interview. This method allows participants to challenge the data collection process and interpretation of the data (Shenton, 2004).

**Transferability**

While qualitative researchers do not expect generalization of their findings, transferability infers that results from one study could fit the context of another study when comparing processes, instruments, and research sites used (Bloomberg & Volpe,

2008). Transferability can be achieved by establishing detailed boundaries related to the study scope, data collection period, data collection methods, sample demographics, and the number of organizations and participants involved (Shenton, 2004). It is important to provide a sufficient description of the phenomenon being examined and to enable readers to understand the research as it emerged fully. I planned to achieve transferability by providing detailed descriptions of the data to allow the reader the ability to make comparisons within other contexts. This method requires the researcher to provide thick descriptions of the research setting and participant information to enable the reader to transfer design aspects and findings (Curtin & Fossey, 2007).

**Dependability**

Dependability refers to the reliability of repeating the research in similar situations within the same design context, data collection and analysis methods, and participant demographics to produce similar results (Shenton, 2004). I planned to achieve dependability by creating and executing a data collection plan based on my research question. My data collection plan was to use the interview protocol (Appendix C), transcript software, field notes, and recorded interviews. Also, I planned to conduct a pilot test to test the interview protocol and adjust for correctness and consistency before conducting my main study.

**Confirmability**

Confirmability relates to objectivity in the research (Shenton, 2004). Confirmability occurs when research results are based on the participants' experiences and ideas rather than the predispositions of the researcher. To achieve conformity, the

researcher must refrain from interjecting self-biases and subjectivity. According to Bloomberg and Volpe (2008), this can be done by identifying an audit trail and triangulating journal notes, field notes, and recorded interview transcripts to track the data findings back to their origin. Shenton referred to this approach to confirmability as a '*data-oriented*' approach allowing the reader to track through steps of the research decisions and procedures described by the study.

I planned to achieve confirmability by acknowledging any potential biases and assumptions made in the interpretations of interview transcripts by using member-checking and reflexivity. Reflexivity is the acknowledgment that the researcher is an active study participant interjecting influence during the interview sessions and data analysis process (Curtin & Fossey, 2007). I engaged the interviewees to review the interview summaries and identify adjustments as needed as a member-checking approach. Also, I planned to reduce the potential for bias by masking participants' identities by assigning each interviewee a participant number.

**Ethical Procedures**

The Institutional Review Board (IRB) reviews all research proposals to ensure ethical issues related to data collection, data analysis, and interpretations, and the publication of research findings comply with the university's ethical standards and U.S. federal regulations. I followed the IRB's ethics review process to gain approval before engaging in participants' recruitment and executing my data collection plan. Upon IRB approval of my proposal, I commenced with the recruitment steps and data collection activities.

I planned to establish safeguards to protect the rights and autonomy of my study participants by password protecting all electronic data and stored via an external hard drive and any backup copies created. This data was accessible by me only. The only exception was during member-checking activities of the interview summaries and transcripts. All electronic and physical files were stored in a locked filing cabinet in my home office and kept for a duration of 5 years as required. After that, I planned to destroy all electronic and physical files.

## Summary

In Chapter 3, I provided the design description and rationale for using a qualitative phenomenology study which was based on my research question. I illuminated the role of the researcher and outlined the methodology for selecting and recruiting participants. I described the research instrumentation, using a pilot study, data collection tools, and the approach to conduct data analysis of participant interview transcripts to identify emerging themes from the data. Also, I discussed the issues with trustworthiness and the approach to be used to address each. Finally, I discussed the steps to be executed to comply with the university's IRB requirements.

In Chapter 4, I share the details of the actual execution of my research by elaborating on the recruiting steps, data collection and analysis approaches, participant demographics, and interview settings. Also, I include in-depth details of the study results supported by direct statements, keywords, and phrases from the participants. Lastly, I introduce key findings that will be interpreted in Chapter 5.

Chapter 4: Results

The purpose of this qualitative IPA study was to explore the lived experiences of EOs regarding their interactions with executives. My goal was to evaluate EOs' perceptions of their effectiveness in influencing executives' ethical behavior within organizations operating in North America that have an established ethics and compliance program. The research question guiding this study was, How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? I developed 12 questions that made up my interview protocol (Appendix C) to steer participant discussions and direct the data collection efforts.

Chapter 4 begins with a description of the pilot study. I share the lessons from the pilot study that influenced my approach to the main study and the changes I adopted to instrumentation and data analysis strategies. From there, I elaborate on the research setting. After presenting the participant demographic information, I describe the data collection process, including any changes made to the recruiting and data collection plans. I explain the data analysis process used to transcribe interviews and identify the statements, phrases, keywords, categories, and themes. Before presenting the study results, I present evidence of credibility, transferability, dependability, and confirmability to demonstrate trustworthiness.

Next, I elaborate on the results of the study. I share the analysis in response to my research question by presenting the overarching themes and corresponding participant statements from the interviews that emerged during the data coding process. This chapter

concludes with a summary of Chapter 4 and an introduction to Chapter 5, where I interpret the results.

## Pilot Study

To prepare for the main study, I conducted a pilot study using the interview protocol listed in Appendix C. Through this experience, I ensured the instrument flowed logically, was understandable, and generated responses related to the study's research question and purpose. The pilot study experience allowed me to practice my interview execution with a participant to judge the timing and delivery of the interview protocol. Further, executing this pilot study provided an opportunity to adjust the interview questions, format, and relevant instructions to participants and assess my note-taking approach. The role of the pilot study participant was to actively respond to the interview questions and provide feedback on the questions and my delivery.

Two EOs meeting the participation criteria participated in my pilot study. The first participant was a former colleague who filled the EO role as a consultant. From there, I used a purposeful selection approach to recruit a second participant from active and retired EOs with profiles on the LinkedIn social media platform. I executed the same recruiting approach for my pilot study as my main study. Each pilot study participant received the initial recruiting request email and the informed consent form. Before scheduling the virtual Zoom video one-on-one interview sessions, participants responded with the requested email confirming their consent.

The first participant's (PS-01) feedback was that I should consider combining Questions 9, 10, and 11 because the responses to Question 9 concerned challenges faced by the EO most likely would also answer the other two questions.

I did not modify the delivery of these questions for the main study because only one of the eight participants blurred their response to Q9, answering Q10 and Q11 at the same time. Each participant offered valuable information by answering these questions independently. Therefore, I did not adjust the interview protocol based on the pilot study recommendation.

## Research Setting

As outlined in Chapter 3, I followed the flow of the modified interview protocol (Appendix C) as a guide for each participant. I actively listened and took in-depth notes to ask clarifying questions and engage in dialogue, prompt additional responses, and ensure that my understanding of the electronic transcripts aligned with my notes and the participant's responses. The participants did not receive the questions in advance beyond the examples in the informed consent form, email, and LinkedIn solicitation messages.

I introduced the study purpose and selection criteria to each potential participant before they agreed to participate and again before scheduling the interview. I used the informed consent approach by providing a consent form and asking participants to respond with an "I consent" email. According to Bloomberg and Volpe (2008), informed consent is essential to research ethics and protects the autonomy of human subjects.

Each participant's availability determined the interview schedule. Seven participants could schedule their interviews the following week after they agreed to

participate. One participant was able to interview the same week, and one scheduled the interview 2 weeks later due to personal time away. Being flexible with my schedule allowed participants to select the day and time for the interview during their daytime business, evening, or weekend hours. This approach to scheduling the interview sessions made it possible to conduct each conversation uninterrupted.

All participants chose to engage in the interview session during business hours from their homes or professional offices where privacy and interruptions were controllable. I engaged from my home office for all the interview sessions, conducting all interviews during business hours. Over the Christmas and New Year's holidays, I encountered the usual scheduling challenges consistent with the busy schedules of these high-level executives.

## Demographics

There were nine participants in the main study. Six men and three women under various titles within different organizations participated. None were from the same organization, and all participants were in the United States. Most participants used the EO title (56%). Initially, the selection criteria required participants to be a member of a community of practice—specifically, ECOA, SCCE, SOC, or HCCA.

The number of participants secured through the purposeful selection process compared to snowballing was about equal, where five participants (56%) confirmed through the purposeful selection approach and four participants (45%) through snowballing from referrals. The background foundations for five participants (56%) were from a legal foundation, with accounting, business administration, electrical engineering,

and project management each represented by one participant. Lastly, my sample included active and retired EOs: seven participants (78%) were active, and two participants (22%) were retired.

## Data Collection

Data collection commenced after receiving IRB approval to proceed. I followed the recruiting and data collection process described in Chapter 3 with the following exceptions:

Initially, I planned a target of 12 participants. After multiple searches for participants, this criterion was relaxed to increase the response rate and secure engagement. Also, I expanded my potential participant pool to include associates in corporate and state government organizations. Only one participant was a community of practice member: MS-06 belonged to ECOA and SCCE. I captured responses during the interviews for demographic information.

I planned to use a special LinkedIn account to provide the selection criteria and to connect with interested participants. While establishing a special LinkedIn account, I found this approach did not yield the expected results. I realized that posting requests globally on LinkedIn did not provide contact with EOs as expected. Consequently, I abandoned the special account and used my existing LinkedIn account to solicit participation.

For the main study, I used purposive sampling to recruit participants by sending 126 recruitment emails and LinkedIn solicitation messages. Due to the low response rate, I sent out an additional 146 combined recruitment emails and LinkedIn solicitation

messages to generate interest and secure participation consent. Overall, I sent out 272 recruitment solicitations, receiving 56 responses. Eight declined, four wanted more information, 32 were undeliverable, 221 were nonresponsive, nine agreed to participate in my main study, and two for my pilot study.

Snowball sampling occurred to obtain additional participants after each interview for my main study. Snowball sampling proved helpful in assisting with the recruitment of interviewees and allowing a broader reach of qualified participants (Koerber & McMichael, 2008). I continued sending solicitation emails, LinkedIn in-messages, and using the snowball approach until I reached data saturation.

Throughout the interview process, I reviewed the responses and looked for evidence of saturation. That evidence was provided by coding statements, phrases, and keywords between interviews and checking which codes and themes repeated or new codes and themes appeared. In my quest for saturation, I excluded the first five questions about participant demographics. The last seven questions were open-ended, allowing participants to share freely their experiences as an EO.

I considered saturation satisfied with two criteria. The first criterion was to evaluate the addition of new information or new value during analysis. The design of the last seven open-ended questions was to get at the essence of the research question. The first six participants shared their typical daily experiences, challenges, and approaches as an EO to influence executive behavior. Within these first six participants, I created a coding structure that fit the replies of the two remaining participants. The coding

structure focused on the conceptual framework of ethical leadership and the EO role, and the design led logically and naturally to saturation.

The second criterion to judge saturation was recognizing if subsequent interviews generated new categories. I looked for evidence of saturation as I coded each participant's responses, capturing statements, phrases, and keywords. I checked for repetition of those statements, phrases, and keywords as I compared the responses to those of the interviews already conducted. With the first six participants (MS-01 to MS-06), I categorized statements as *reports ethical inquiries/incidents*, *interaction with executives*, *standards and policies*, *training employees*, *point of contact*, *investigates and analyses*, *role dynamics*, *hierarchy*, *influence characteristics*, *possible conflicts*, *ticket system*, *provides guidance*, and *regulations*. The replies from the remaining two participants (MS-07 and MS-08) fit into those categories and produced no new codes of value. Although the nine participants were fewer than the targeted 12, I met the saturation criteria after the sixth interview.

Each participant was labeled MS-01, MS-02, etc., where MS represented the main study and PS-01 and PS-02 for the pilot study to ensure the anonymity of the data captured and the participants' identities. I masked participants' names, the name of their organization, and any other descriptive demographic details to reduce bias and ensure the focus of the study was on the lived experiences of the participants.

The first interview (MS-01) occurred on November 7, 2022, and the final interview with MS-09 was planned for April 24, 2023, for a total duration of 9 months.

MS-09 did not attend the scheduled interview session and was unreachable via email, LinkedIn in-messaging, or telephone to reschedule.

I asked all questions in the order outlined in the interview protocol (Appendix C), interjecting additional probing questions following the initial responses before moving on to the next question. During the interview sessions, I captured handwritten field notes on verbal tone, body language cues, and quick reminders of the recorded responses. Initially, the interviews were 60 minutes long. However, after conducting a few interviews, I found the main study sessions lasted between 35 and 40 minutes because I was improving my delivery of the protocol questions.

All interviews were audio and video-recorded using the Zoom and Teams software applications. One participant requested Teams rather than Zoom because Zoom was unavailable on his office laptop. All the other interviews occurred using Zoom. I created electronic transcripts by uploading the mp4 audio files into Otter.ai software to produce a Microsoft Word transcript document.

I checked each transcript for accuracy by comparing the written and audio versions. Even though I used Otter.ai software to transcribe the session recordings to produce a written transcription in Microsoft Word, I found some errors with missing, duplicated, or incorrect words. I scrubbed each written transcript and compared it against the audio recording to ensure the transcript data were accurate and represented the session dialogue. Each participant received a summary of the interview transcript via email to check the document and respond if corrections were needed. I received no requested changes from the study participants.

**Data Analysis**

I used a double hermeneutic process where I focused on participants' lived experiences as they made sense of those experiences and my effort to find the meaning within their responses. I developed a systematic approach, represented in Figure 1, to capture statements, phrases, and keywords from the interview transcripts before assigning categories (codes) and then transitioning those categories into themes. I performed the data analysis using an Excel workbook.

**Figure 1**

*Systematic Coding Process*
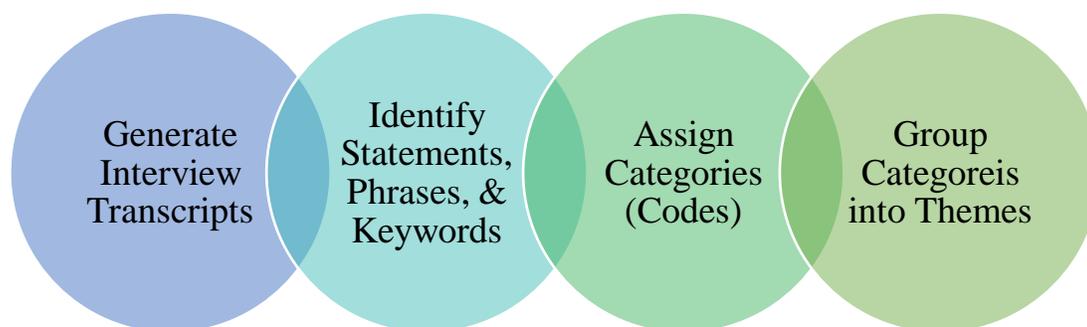


For questions Q1–Q5, I created a table format worksheet to gather *demographic information* for the first five multiple-choice questions. I asked all participants five multiple-choice questions related to demographics at the beginning of the interview (Table 1) to determine if the sample was homogeneous. The sample was homogeneous based on the specified selection criteria. There was a mixture of participants functioning within corporate or government settings. Half had legal backgrounds. Five of the eight were currently serving in the EO role. Only one belonged to one (or more) of the four specified communities of practice.

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**Table 1**

*Participant Demographic Information*

| Participant | Community member | Corporate title | Active/ retired | In role | #Staff EOs | Background | Corporate/ government |
|---|---|---|---|---|---|---|---|
| MS-01 | No | Staff attorney (EO) | Active | Current | 3 | Legal | Government |
| MS-02 | Other | Executive director of legal services (EO) | Active | Current | 1 | Legal | Government |
| MS-03 | No | Other | Retired | Last 10-years | 7 | Project management | Corporate |
| MS-04 | Other | Staff attorney (EO) | Active | Current | 2 | Legal | Government |
| MS-05 | Other | Executive staff advisor (EO) | Active | Current | 1 | Accounting | Government |
| MS-06 | Yes | Lead ethics advisor / director | Active | Last 10-years | 1 | Business administration | Corporate |
| MS-07 | No | Engineer manager (EO) | Active | Current | 100 | Electronic engineering | Corporate |
| MS-08 | No | Ethics officer | Retired | Last 10-years | 15 | Legal | Corporate |

I then created a worksheet for each of the seven open-ended questions (Q6-Q12) that focused on the *perspective of the ethics officer role*. The worksheets were labeled Question 6, Question 7, through Question 12. Using Microsoft Excel allowed me to sort

the categories (codes) and find information on each worksheet while tracking frequencies of the categories (codes) and, later, the themes created by further grouping the categories (codes).

On each worksheet, I established a column labeled *Statements*. In this column, after each interview, I captured statements, phrases, and keywords from the transcribed interview responses that were significant to the essence of the question.

Next, I grouped the statements into higher-level categories (codes) using one or two words that identified commonalities among participant statements. I noted them in a separate column labeled *Code* on each worksheet. I repeated this step until statements from all eight transcripts' questions were analyzed and coded into categories.

Lastly, I derived a higher-level set of themes that represented the commonalities among participant responses for each question. I discovered these themes through consolidation and aggregation from the previous categorization step until I identified a handful of the significant themes for each question. I recorded the themes in a fourth column in each worksheet labeled *Theme*.

To determine the combined overall themes and frequencies, I reviewed the top themes across all questions by consolidating the themes for all seven questions (Q6-Q12) for all eight interviews into one worksheet. Then, I created a pivot table to sum the frequencies as each theme emerged from the codes derived for each question, identifying those deemed significant when combined for all questions. The number of participants statements for some questions included more than one for each question. The number of statements from each participant per question was a multiple-to-one relationship and not

a one statement-per-participant-per-question count. Therefore, the frequency of statements, categories, and themes did not fit into a precise mathematical formula.

Table 2 illustrates the 10 most frequent themes and their related frequencies across all questions. The five themes most frequently identified were *effective interaction*, *guidelines*, *role definition*, *training*, and *reporting*. Three themes stood out: *effective interaction*, *guidelines*, and *role definition*. I consider these key findings because they relate to the study's purpose and contribute to answering the research question.

**Table 2**

*Overall Emerging Themes by Aggregated Frequency*

| Overall themes | Frequency |
|---|---|
| Effective interaction | 58 |
| Guidelines | 56 |
| Role definition | 56 |
| Training | 38 |
| Reporting | 33 |
| Tracking and monitoring | 25 |
| Investigations | 23 |
| Outcome perceptions | 23 |
| Organizational structure | 21 |

Next, I elaborate on the themes that emerged for each question. I provide participant comments to support each theme. I did not identify any discrepant cases or the appearance of nonconforming data.

**Q6: A Typical Day as an Ethics Officer**

Q6 was an opening question to build rapport, allowing participants to speak about their typical daily duties as an EO. The responses yielded 62 statements, phrases, and keywords from the written interview transcripts. The three most frequent themes that emerged were *guidelines*, *role definition*, and *tracking and monitoring*. MS-01 said, "We do regulations." MS-03 elaborated that the ethical program "built a framework of what is right based on standards and policies."

**Table 3**

*Q6 Emerging Themes*

| Q6 Themes | Frequency |
|---|:---:|
| Guidelines | 15 |
| Role definition | 13 |
| Tracking and monitoring | 12 |
| Investigations | 9 |
| Training | 7 |
| Reporting | 6 |

The second most frequent theme that emerged was *role definition*. While MS-01 described the role as "well-defined and crisp," most responses supported the notion that the EO usually was in a dual role of some type. MS-02 described the duty of being caught between serving as legal counsel and EO, stating a typical day as "not a situation where my focus every day is just the ethical issues that present themselves." MS-05 mentioned that upon the initial review of an inquiry, the first step was to determine if the inquiry was

a human resource or an ethics issue to ensure the right leadership team responded to the inquiry.

The third emerging theme was *tracking and monitoring*. There were variations in using ticketing systems and reporting frequencies. Helpline monitoring was consistent with all participants. MS-07 described the ticketing system as having the ability to capture anonymous calls, emails sent to the EO, corporate intranet webpage entries, and face-to-face conversations with the local onsite EO. MS-04 stated that "ethics issues, they kind of come up sporadically," and a ticketing system is helpful to track the inquiry and monitor the outcomes.

## Q7: Direct Interactions With Executive-Level Leadership

Q7 was intended to discover the extent of the engagement of EOs with the executive level and to grasp the EO's reporting hierarchy within the organizational structure. Three themes emerged from the data: *effective interactions*, *organizational structure*, and *reporting*. This finding aligns with the question's intent. MS-08 was an anomaly since the EO was part of the senior leadership team, which offered daily interactions and open-door access to executive-level leadership.

**Table 4**

*Q7 Emerging Themes*

| Q7 Themes | Frequency |
| --- | --- |
| Effective interaction | 12 |
| Organizational structure | 11 |
| Reporting | 11 |
| Tracking and monitoring | 6 |
| Role definition | 5 |
| Guidelines | 4 |
| Investigations | 2 |
| Training | 1 |

MS-05 reported to the deputy executive director, which gave daily access to executive-level leadership. MS-07 was a remote site EO with a dotted line to the corporate executive office but stated, "I do not have any direct contact with executives." MS-03 had limited interactions with the executive level since the layers of the organizational structure were a deep chain of command that provided slower feedback loops. In this case, the EO was a trusted advisor but not a direct report to the executive level or the board of directors. Overall, the perception of most participants was that the EO role had the appropriate hierarchy and opportunity for interactions with the executive level.

**Q8: Perceptions of Influence on Executive-Level Ethical Outcomes**

Q8 dove into EOs' perceptions of their influence on ethical outcomes aligning with the gap in the ethical leadership research related to strategies used by EOs and their

effectiveness as influencers of top leadership ethical behavior. The EOs who participated in my study perceived themselves as highly influential when guiding organizational ethical behavior. This confidence in their influence resonated with the emergence of the most significant theme of *effective interaction* for this question. Two other themes were consistent throughout their responses. They were *role definition* and *guidelines.*

**Table 5**

*Q8 Emerging Themes*

| Q8 Themes | Frequency |
|---|---|
| Effective interaction | 24 |
| Role definition | 14 |
| Guidelines | 12 |
| Tracking and monitoring | 2 |
| Investigations | 1 |
| Reporting | 1 |

MS-01 stated executive egos needed navigating but was "very confident that the things I am asked to weigh in on are done based on that decision," where the decision represented the EO's recommendation. MS-04 perceived a "fairly heavy influence on the decisions and executives when my input is provided," while MS-05 said, "I do find that they take it seriously and act upon it when you do provide feedback." MS-06, MS-07, and MS-08 believed they, in the EO role, were highly influential on executive-level ethical outcomes.

**Q9: Challenges Faced to Influence Executive-Level Ethical Behavior**

This study was needed to provide insights to help improve leadership structures, organizational ethical cultures, and ethics training programs and expand the tools to help grow the EO influence and effectiveness at the senior-most levels. The essence of Q9 was to gain insights into the challenges those in the EO role experienced to understand possible recommended changes. Parsons et al. (2019) noted the placement of the EO within the organizational hierarchy was a crucial challenge impacting the EO's effectiveness. Therefore, I expected to see challenges within the organizational structure frequently mentioned. However, the *organizational structure* theme emerged only three times out of the 55 statements captured for this question.

The most frequently mentioned challenge for the EO was the *outcome perceptions* theme relating to possible conflicts of interest and individual differences in the definition of ethics. MS-03 defined ethics as situational, saying, "We all have our own moral and ethical standards" to guide us. MS-01 described ethics as a "gray area," saying, "We have things that are even if it is not a conflict to the outside world, it might look like one internal to the organization."

**Table 6**

*Q9 Statements for the Emerging Theme – Outcome Perceptions*

| Participant | Statements | Code |
|---|---|---|
| MS-01 | You are being asked something, and you just you personally known the person. In this case, you just have to tell them no | Possible Conflicts |
| | Things are deemed ethic, comp, ethical conflicts | Possible Conflicts |

| Participant | Statements | Code |
|---|---|---|
| | We have things that are conflicts | Possible Conflicts |
| | Gray areas | Individual differences in the definition of ethics |
| | Primarily, it is requests for outside employment | Possible Conflicts |
| | Somebody who is a government official, but wants to be employed outside of the government | Possible Conflicts |
| | Side gig | Possible Conflicts |
| MS-03 | Remain as unbiased as possible | Possible Conflicts |
| | Hardest thing is remaining as middle ground as possible | |
| | We all have our own moral and ethical standards | Individual differences in the definition of ethics |
| | It is also situational | Individual differences in the definition of ethics |
| | As long as the system is operating within the upper and lowered control limits, you would have to say we are ethical | Individual differences in the definition of ethics |
| MS-04 | Not wanting to give my decisions or my opinions, the weight and created that they deserve | Individual differences in the definition of ethics |
| | Those individuals that own these, these vast conglomerates, they are sitting on the boards and commissions making the decisions | Possible Conflicts |
| | Making decisions that is their businesses or their personally | Possible Conflicts |

The second emerging theme was *guidelines*, where the influence of behavior was related to the perceptions of the laws and regulations. MS-02 illuminated the differences between the rigid adherence to the requirements of the government and the corporate setting, where "requirements are viewed more as recommendations and not a mandate." Further, MS-02 stated the "biggest challenge in corporate work is trying to reinforce the concept of ethical behavior based on statutory mandates." MS-04 emphasized that

maintaining an ethical culture "required all of the boards and the commission to restate a commitment to the ethics laws," setting the example and increasing the effectiveness of the EO.

**Q10: Approaches to Involve Executive-Level Leaders**

A practical approach to engaging executive leaders in the ethics program was the widely used annual training. Therefore, I found *training* the most significant theme emerging with this question.

**Table 7**

*Q10 Emerging Themes*

| Q10 Themes | Frequency |
|---|---|
| Training | 13 |
| Reporting | 7 |
| Guidelines | 5 |
| Effective interaction | 4 |
| Investigations | 4 |
| Tracking and Monitoring | 4 |
| Role Definition | 4 |
| Outcome Perceptions | 1 |
| Organizational Structure | 1 |

MS-06 shared they "had a separate training for the board of directors." Per MS-06, the "executive training was at a higher level focused on bribery, money laundering, conflict of interest to provide ethical guardrails and guidance to which they were more susceptible." Further, MS-06 said, "We identified risks for each major line of business and provided training on their particular risks." MS-05 put it into perspective, saying that

it was the EO's responsibility to "ensure all employees have taken the annual ethics training (including all executives)."

**Q11: Influence Effectiveness With Executive-Level Leadership**

Q11 allowed participants to elaborate on their perceived effectiveness in their approaches to influence executive-level leaders that they might not have already mentioned. Overall, all participants exuded confidence in their efficacy, and the most frequent emerging theme was *effective interaction*. Table 8 shows those themes that emerged from this question.

**Table 8**

*Q11 Emerging Themes*

| Q11 Themes | Frequency |
|---|---|
| Effective interaction | 7 |
| Guidelines | 5 |
| Outcome perceptions | 4 |
| Reporting | 4 |
| Role definition | 4 |
| Investigations | 3 |
| Organizational structure | 1 |

MS-08 was confident in the effectiveness of the EO since MS-08 "was the senior leader with an office amongst the other executives and easy access to them." MS-04 felt "very effective in influencing behaviors." MS-06 was confident in influencing behaviors by saying there was "moderate to high influence on outcomes."

**Q12: Differences in the EOs' Approaches**

Q12 captured the EOs' reflections on what they would do differently in their

approaches to increase their influence on executive-level ethical behaviors, if possible.

For Q12, *training* was the number one emergent theme.

**Table 9**

*Q12 Emerging Themes*

| Q12 Themes | Frequency |
|---|---|
| Training | 13 |
| Role definition | 9 |
| Effective interaction | 6 |
| Organizational structure | 5 |
| Guidelines | 4 |
| Reporting | 2 |

MS-03 said we must "do a better job defining the vision of being an ethical

organization to support the mission." MS-01 added this improved alignment would come

through having "awesome training materials." MS-05 said the training materials should

"increase the ethical awareness" and "encourage people in leadership positions to attend

training to stay on top of things and beyond."

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**Evidence of Trustworthiness**

</div>

In Chapter 3, I shared the four criteria used to ensure the trustworthiness of

qualitative research: *credibility*, *transferability*, *dependability*, and *confirmability*

(Shenton, 2004). These criteria ensure that the findings came from the data rather than the

researcher's predispositions. Trustworthiness establishes the validity and reliability of the

study findings (Bloomberg & Volpe, 2008). Validity and reliability show credibility and rigor in qualitative research (Curtin & Fossey, 2007). In the following sections, I describe how my data-gathering steps are repeatable and reliable, and my results are believable and transferable to similar situations.

**Credibility**

I used Patton's (2002) method of triangulating multiple data sources (interview transcripts, field notes, and audio records of the interview sessions) to increase the accuracy and validity of my findings. I triangulated the semi-structured interview with an audio recording of all sessions and my field notes to confirm my interpretation of the material and accurately capture participant responses. The interviews were conducted in a virtual setting, introducing time, space, and individual differences, allowing for similarity yet yielding variations based on each participant. This variation allowed themes to emerge from across all eight participants. Therefore, there was method and source consistency.

After sanitizing the interview transcripts, member-checking for all eight occurred. Member-checking was achieved by providing the transcript to my participants and asking them to review and identify corrections or acknowledge the accuracy of the data gathered during the session. I received no responses asking for revisions.

Further, I kept a journal while conducting this research. I kept track of notes from each interview session, scheduling details of upcoming sessions, ideas on asking the questions more precisely in the following interview, and future participant recommendations. An excerpt of my reflection on November 18, 2022, is the following:

I conclude the struggle to secure participants includes the tight criteria for participants to belong to one of these four communities of practice: ECOA, SCCE, SOC, or HCCA. It will be necessary to loosen this criterion and ask if they do, but do not eliminate them if they do not.

This change opened the opportunity to secure seven additional participants without jeopardizing the integrity of the study sample.

**Transferability**

According to (Shenton, 2004), transferability is when findings can be applied to similar situations using information on data collection and the number of participants. I demonstrated transferability through the detailed descriptions of my population and data collection approach, as depicted in Chapter 3. I desired a minimum of 12 and obtained eight participants, which did yield saturation. My participant selection added to the transferability of results since I explored the lived experiences of EOs with similar demographics.

Recruiting occurred through soliciting EOs to participate using direct emails, LinkedIn in-messages, and referrals from interviewees during our sessions. For participants to be eligible for this study, they must have served, currently or previously, in the EO role or a similar role performing the EO responsibilities within the last 10 years, employed by an organization with operations in North America, were at the director level or above within the organizational hierarchy and was a member of at least one communities of practice.

I struggled to secure participants due to my selection criteria being too stringent. First, most candidates did not belong to one of the four named communities of practice. I found some belonged to internal groups or the Bar Association but not the four communities of practice expected. Second, I desired all participants to be at the director level or above. This second criterion limited my candidate selection since most EOs did not see themselves at that level even though they had access to executive-level leadership. It was necessary to loosen these criteria to secure participation.

Data collection occurred using Zoom and Teams software to audio-record the interviews, then create those recordings into written transcripts using Otter.ai software. I captured field notes of my interpretations and clarifications of critical responses, participants' tone or hesitation in responses, and recommendations of other candidates and additional research topics. All participants were asked the same questions following the interview protocol (Appendix C).

**Dependability**

Shenton (2004) defined dependability as the reliability of duplicating previous research conducted in similar situations using the same participant demographics, design context, and data collection and analysis methods to produce similar results. Based on my research question, I demonstrated dependability by creating and executing a data collection approach as outlined in Chapter 3. In alignment with my data collection plan, I used the same interview protocol (Appendix C) for all participants.

Also, I created an audit trail using Microsoft Excel to track my steps through the data collection and analysis processes for each participant (Appendix D). Further, I used

Otter.ai software to upload the interview session audio recordings and produced a Microsoft Word written transcript to facilitate the member-checking and data analysis steps.

Before scheduling interviews, I conducted a pilot study testing the interview protocol with two EOs who met the study eligibility criteria. This pilot study was to ensure the questions were straightforward and test the time to complete the interview. From the pilot study, I recognized responses with Q7 could also frequently answer Q8. Also, Q9 responses overlapped with Q10 and Q11. All discussions were Zoom or Teams audio-recorded and transcribed using Otter.ai software.

**Confirmability**

Confirmability, according to Shenton (2004), relates to objectivity in the research when the results are based on the experiences and ideas of the participants rather than the researcher's predispositions. The researcher must refrain from interjecting self-biases and subjectivity. It was easier not to introduce my self-biases since the topic of this study was in a field where I had little pre-knowledge or professional experience. Confirmability was demonstrated through member-checking of interview transcripts allowing the participants to review the dialogue and identify any bias that I may have unintentionally interjected in the summary that could be identified and corrected. Also, following the recommendations of Bloomberg and Volpe (2008), I used a data-orientation approach by creating an audit trail that triangulated my field notes and the recorded interview transcripts to track the data findings back to their initial origin.

Curtin and Fossey (2007) defined reflexivity as the researcher's acknowledgment that they are an active participant, with the potential of interjecting influence during the interview sessions and data analysis process. I demonstrated my acknowledgment of reflexivity and took steps to ensure I did not introduce bias during the data collection and analysis activities. I assigned a number to each participant and masked their name to ensure I did not sway the data analysis. This approach allowed me to separate the participants' demographics from their interview protocol responses. Further, I reviewed my field notes for clarification of my interpretations. I identified an audit trail and triangulated my field notes and the recorded interview transcripts to track the data findings back to the origin.

## Study Results

I conducted qualitative interviews identifying statements, phrases, and keywords related to the factors that frame the EO's perception of their effectiveness in influencing behavior. In my analysis of the transcripts, I recognized several prominent themes emerging based on the frequencies of the aggregation of the open-coding and axial-coding approaches used with Q6-Q12 for all eight interviews to move from individual participant statements to the combined overall themes: *effective interaction*, *guidelines*, *role definition*, *training*, and *reporting*. These themes provided insight into the lived experiences of EOs and their perceptions of their influence on executive-level ethical behaviors within their respective organizations.

Using the overall aggregated frequencies by combining Q6-Q12 themes, I saw a clear break in the frequencies between the top three and the remaining six. Based on this

break, three themes emerged clearly as the most frequent; and, therefore, represent the key findings related to the study purpose that contributed to answering the research question. Those key findings were *effective interaction* (17.42%), *guidelines* (16.82%), and *role definition* (16.82%). I arrived at these percentages by starting with the statements for all seven questions (Q6-Q12) combined, then aggregated those statements into codes, and finally aggregated those codes into themes for each question. The total frequency of each aggregated theme divided by the overall frequency of all themes produced these percentages.

The themes of *effective interaction, guidelines,* and *role definition* were present in the responses for all seven questions (Q6-Q12). *Reporting* was the only other theme mentioned in all seven open-ended question responses. However, this theme's overall frequency did not reach the same level as *effective interaction*, *guidelines*, and *role definition*.

**Theme 1: Key Finding - Effective Interactions**

The theme of *effective interaction* emerged with all seven open-ended questions (Q6-Q12). I aggregated the categories of *interactions with executives*, *influence characteristics*, *and confidence in effectiveness* to yield the theme of *effective interactions*. Participant statements from Q7, Q8, Q9, Q10, and Q12 described the EO's perceptions that their interactions were daily or at least multiple times a week in most cases. With Q7, MS-02 stated, "I interact with executives every day," and MS-08 said there were "daily talks on ethics issues with executives." On the converse, MS-04 noted,

"There is not a daily interaction between the General Counsel, Commissioner, or me," followed up with, "I operate fairly autonomously."

Some challenges related to interaction effectiveness: for example, executive egos and that there are no guarantees that the executive team acts upon the EO's guidance. MS-06, with a response to Q9, elaborated on the challenges related to effectiveness, stating, "egos of the executives made it difficult to influence them." MS-04 supported that stance, saying that the "egos of the executives" were the biggest challenge. MS-08's response to Q8 provided a contradictory perspective, stating that "leaders are ultimately elected officials who want to run a squeaky-clean organization" and, therefore, engage with EOs to guide ethical behavior at all levels of the organization.

Q8 provided insight into the EO perspectives of the *influence characteristics* category. MS-06 said that "influence was moderate to high and very good;" MS-07 added they have "seen changes in the way ethics issues are raised, or guidance requested were made over the past." MS-05 said, "Yes, I do find that they take it seriously and act upon it when you do provide feedback." This influence is accomplished in one approach when executives " hold their [directors] feet to the fire and hold them accountable to our code of conduct and our key values."

Overall, the EO's actions were "perceived effective since the investigation of the allegation is through and reported succinctly to the corporate ethics office in a controlled manner of the narrative," as noted by MS-07 with Q11. MS-05 "feels her actions are well received and effective with the executives." MS-01 took a broader corporate-wide perception when asked Q11 by responding that the ethical culture was "distinguishing

itself from other ethical companies and other major companies," reinforcing the EO's effectiveness through their interactions with executives.

**Theme 2: Key Finding - Guidelines**

All seven questions (Q6-Q12) generated dialogue where *guidelines* were part of the discussion. This theme emerged when categorizing the responses of *providing guidance*, following the *standards and policies*, being governed by federal and state *regulations*, holding executives *accountable*, dealing with *records disclosure* events, and building *ethics awareness into executive strategies*. While the responses to Q6, Q8, and Q9 included quite a bit about standards, policies, and guidelines, Q6 had the highest frequency, with 15 statements, phrases, and keywords captured relating to guidelines. Q6 asked participants to describe a typical day. Q8 prompted discussion on the EO's perceptions toward influencing ethical behavior. The design of Q9 was to dive into the challenges faced by the EO.

This finding is logical since a primary part of the EO duties, as perceived by the participants and stated by MS-03, is to "build a framework of what is right based on standards and policies" when responding to Q6. MS-01 noted the responses to inquiries and allegations occur "with a statute to provide guidance" before and after misconduct occurs, and the only approach is to "apply the statute to the situation" since, according to MS-04, "there is no wiggle room." MS-02 emphasized the support of guidelines being the most significant theme for the EO role since "government is rigid based on the requirements outlined clearly within statutory or regulatory requirements."

One shift emerged in the responses for Q6, Q7, and Q8. Q7 asked participants to reflect on their direct interactions with executive-level leaders within their organization in which MS-03 perceived the EO influence was "all evolutionary." With Q8, MS-03 responded that "ethics is a sliding scale." With the same question, MS-07 supported the notation of a perceiving positive shift toward ethical cultures by saying, "People are reaching out for guidance instead of reporting problems after something has already happened." MS-04 with Q8 also supported this shift by stating the guidelines also "works not only to counter decisions but can be in support of them."

**Theme 3: Key Finding - Role Definition**

The third most frequent theme that emerged was the EO *role definition*. Again, this theme emerged out of the exercise to aggregate statements and categories into themes from all seven questions (Q6-Q12). I identified *provides guidance*, in a *dual role & legal counsel*, *point of contact* for ethical inquiries, and an early *warning system* for management as the dominant characteristics defining the EO role.

While there were a few differences between the corporate and government sectors in the responses within my sample, most perceptions were the same. For example, four of the eight participants, MS-01, MS-02, MS-04, and MS-08, had legal backgrounds. Yet, their responses did not differ from those who did not have legal backgrounds, especially when describing their typical day (Q6), their approaches to involving executive-level leaders in the ethics program (Q10), or their perceived effectiveness in influencing executive-level ethical behaviors (Q11). MS-01 perceived the role as "pretty limited" but

"well-defined and crisp." MS-02 perceived it "beneficial to have legal and/or accounting backgrounds, and the role should be segmented from the operational functions."

MS-03 supported that the perception of the role was a "warning system," MS-06 said it was an "advisory role," or, according to MS-03, the role was a "trusted advisor." MS-05 described a critical element of the EO role as being "very open-minded to listening to people's opinions about ethical situations," which MS-03 supported by saying, "We are listening." MS-03 continued, "We are a sounding board for ethics questions." Further, MS-01 and MS-02 perceived the duties to align with an enforcer by being "responsible for ensuring mandates are adhered to," MS-01 described it as "EOs carry out and enforce the things they created."

MS-01 "perceives that some differences exist in the EO role when comparing a government role to a corporate role." MS-02 perceived the EO as better positioned to satisfy the role when a "dual-role of legal counsel and EO helps legitimize the ethical questions and reinforces the requirements." MS-05 expressed the need to expand the role to "play a bigger role as the ethics officer and less as a trainer." MS-07 recommended improving the roles' approaches and enhancing effectiveness by "better separating HR from ethics inquiries to focus on the ethics issues and handing off the HR issues."

**Theme 4: Training**

The *training* theme was associated with Q6, Q7, Q9, Q10, and Q12. I identified *training employees*, *training materials*, *and motivate ethical awareness* as the primary categories that EOs focus on to promote an ethical culture and monitor the organization's ethical behaviors. Overall, 71% of the responses to these questions yielded the category

(code) of *training employees* as the primary approach used by the EO to influence organizational ethical behavior within all levels, including executive-level leaders.

MS-06 supported this theme with Q6, sharing that the EO, through employee training, drives the organization toward ethical awareness with an "emphasis on communication and training to avoid misconduct." MS-03 added that the responsibility rests with organizations to "do a better job of defining the vision of being an ethical organization to support the mission" as part of their efforts to motivate ethical awareness through training employees. MS-01 emphasized that "everybody should do it" and that many, if not all, organizations "have made it a requirement."

Further, MS-06 shared that one approach to increasing the effectiveness of the EO through training was to "tailor training with the level of the employee but also the division of the company." MS-06 illuminated this approach by saying they had a "more specialized type of training for the executives" and "identified risks for each major line of business and provided training on their particular risks." MS-06's organization was the only one with different training based on placement within the organizational hierarchy; they all agreed with MS-03 that the EO "ensured everybody took the training to understand what is meant by ethical behaviors." MS-05 echoed this approach to build an ethical culture and safeguard against misconduct by saying we "ensure that all of our employees have taken or are going to take the ethics training."

MS-01 had another view when reflecting on the training materials and stated that "there is no ethics training based on position." MS-01 said that "some suggestions given by the EO in the past have been introduced into the training materials" when the "ethics

board creates the ethics material." MS-01's perception of the EO's influence on shaping executive-level leadership's ethical behavior through training was limited. The MS-01 statement that "executives take the training content and run with it" within their organizational roles demonstrated this perception.

**Theme 5: Reporting**

*Reporting* was the only other theme mentioned in all seven open-ended question responses. However, this theme's overall frequency did not reach the same level as *guidelines* and *role definition*. All 33 response statements produced the *reporting* theme.

It was evident from seven of the eight participant's responses that fielding ethical inquiries and reporting incidents while offering opinions were vital parts of the EO's duties. This duty allowed engagement with executives and supported opportunities to influence organizational behaviors. MS-05 was the only participant who did not provide a response that supported a category ultimately ending in the *Reporting* theme.

In the responses, I found that reporting ethics inquiries and incidences occurred on some level weekly, monthly, quarterly, annually, and ad hoc depending on severity. MS-03 with Q6 said, "Ethics were reported as part of the monthly reporting" and "monthly reporting, as needed for subject matter, sharing, and then feedback went up and down the chain." MS-07's response to Q10 illuminated that EOs are "required to report to the corporate ethics office anything he hears about an ethics issue." MS-02 further elaborated with Q10 that they are "responsible for reporting to the ethics commission when an outside situation exists." MS-03, with Q7, shared that "the most ethical thing you can do is follow up" on these reported ethics inquiries and incidents.

**Summary**

In Chapter 4, I provided explanations of the pilot and main studies by elaborating on the steps executed through the data collection and analysis processes. The pilot study experience allowed me to adjust the interview protocol and the process before engaging the main study participants, which improved my delivery of the interview questions. I detailed the research setting for the interviews. The demographics of the participants followed, describing their background, participation in a community of practice, corporate titles, active or retired status, and their workplace setting. The data collection followed the approved IRB method, where I interviewed 10 participants between my pilot and main studies. I explained the steps for the anonymity of the participants by masking their identities and coding the categories and themes that emerged.

The main study participant responses to the interview questions led me to identify the five most frequent emergent themes that addressed the research question: How do those serving in the EO position perceive their experiences as stewards to influence executive-level ethical behavior? Those emergent themes were *effective interaction*, *guidelines*, *role definition*, *training*, and *reporting*. *Effective interaction*, *guidelines*, and *role definition* were the three most frequent overall themes related to the EO's perceptions of their duties and influence of executive-level ethical behavior. I discovered no discrepant cases or appearance of nonconforming data.

Finally, I provided the results highlighting the categories and themes supported by statements from the main study interviews. Then, I summarized the themes overall based on frequency. I briefly introduced the top three themes that represent the key findings

significant to the perceptions of the EOs regarding their duties and interactions with

executive-level leaders.

      In Chapter 5, I interpret the three key findings and relate them to previous

research to extend the body of knowledge of the EO's lived experiences and their

perceptions of their influence when guiding executive-level ethical behavior. Further, I

describe the study's limitations of trustworthiness and provide recommendations for

future research and practical application. Lastly, I discuss the implications for social

change and wrap up by presenting the key essence of the study.

Chapter 5: Discussion, Conclusions, and Recommendations

The purpose of this qualitative IPA study was to explore the lived experiences of EOs regarding their interactions with executives. To gather this insight, I explored EOs' perceptions of the role and their engagement approaches. I chose a phenomenological research design to investigate the lived experiences of those serving in the EO role within organizations that do business in North America and have an established ethics program. I collected data from eight interviews, field notes, and public documents on ethics and compliance program effectiveness. Then, I applied a conceptual framework of ethical leadership theory to analyze participants' responses.

Through analysis of the data, three key findings emerged that could prove beneficial to the broader ethics and compliance community. I found that (a) EOs perceive their interaction with executives to be effective; (b) guidelines, training, and reporting of inquiries and incidents are the foundation of their influence; and (c) the definition of the EO role is consistent across corporate and government programs. In this chapter, I discuss the interpretations of these key findings and the study's limitations. Further, I offer recommendations for future research and discuss implications for social change.

**Interpretation of Findings**

**Finding 1: EOs Perceived Their Interactions With Executives to be Effective**

Most of my participants perceived their effectiveness with executive-level leadership as positive and frequent, and direct interaction with executives occurred while their effectiveness increased. Most organizations (63%) represented in my sample had multiple EOs on staff who shared the duties of compliance and regulatory oversight,

ethics training, and monitoring and reporting ethics inquiries and incidents. This finding

supports the notion that executives are listening, recognizing, and supporting Weaver et

al.'s (1999) argument that firms with a single EO responsible for the entire ethics

program may demonstrate a false sense of the organization's ethical health. Weaver and

Wasieleski (2013) found EOs to be a critical influence on executive behavior to help

prevent misconduct before an incident occurs and reduce unethical penalties. My research

demonstrates that organizations expand the number of EOs sharing the duties across

multiple people rather than relying on one individual.

Murphy (2002) stated that the effectiveness of the EO depends on the

relationships built with leaders across an organization. Parsons et al. (2009) stressed that

placement within the leadership structure is crucial to EO effectiveness. My research

supports Parsons and Murphy's arguments. The organizational structures described by

my participants (75%) showed them reporting directly to executive-level leadership with

frequent, daily, or multiple-times-per-week engagements, contributing to their confidence

and perception of their effectiveness. Martin (2015) emphasized the need for the EO to

have a direct relationship with the board of directors to empower the role to protect the

organization's credibility and to encourage executives to obey the guidelines. While only

25% of my participants had direct access to the board of directors, none perceived this

reporting structure to limit their ability to govern the organization's ethical culture.

**Finding 2: The Foundation for Influencing Behavior included Guidelines, Training, and Reporting Inquiries and Incidents**

I found in my review of the literature that the effectiveness of the EO was based on the balance between compliance with laws and regulations, protecting the company's executives and the organization's reputation, and achieving corporate profitability (Gnazzo, 2011; Murphy, 2002). Morf et al. (1999) supported this thought of creating the role of the EO as a mechanism to watch over corporate actions. According to Mazur (2017), leadership expects the EO to address organizational leadership misconduct after violations occurred. My participants said their duties included compliance oversight of the ethical culture to adhere to local, state, and federal regulations and guidelines. Guidelines (16.8%) were the second most frequent overall theme when aggregating themes across all eight interviews. Based on those interviews, my findings demonstrated that 46% of the role is focused on oversight of standards and policies and 19% on regulations. This finding supports the compliance approach toward the ethics program to ensure adherence to the guidelines before misconduct occurs rather than after experiencing infractions and financial penalties.

According to Weber (2015), employee training is vital to influence adherence to guidelines and regulations. My findings showed that 71% of the participants' statements related to training focused on *training employees* as the primary approach the EO uses to promote ethical awareness and influence executive-level behaviors. One strategy to increase EO effectiveness and their influence on executives emerged in my findings: the tailoring of training materials specific to the risks and duties of the executive position.

My participants had differing perceptions on tailoring the training materials for executives. Half of the participants supported varying the focus based on the role within their organizational structure, and half did not. Also, my participants noted that through their annual training opportunities, they could emphasize adherence to the required ethical guidelines and not merely a recommendation. Weber identified six dimensions that each ethical training program should include for all employees: "ethical work climate, ethics policies, sanctions and rewards, enforcement officer, reporting mechanisms, and ethics training" (p.40). The EOs who supported differing training structures for executives identified a key to the EO administering the employee training. Specifically, the key to the executive-level training was to keep training at a higher level focused on bribery, money laundering, and conflict of interest topics to provide ethical guardrails and guidance they were more susceptible to encounter.

Internal and external monitoring for deviations should occur at least annually (Cantone, 1999). Kaptein (2009) recommended measuring the effectiveness of the ethics program through internal monitoring and periodic audits. This form of communication would focus on prevention and increasing transparency in detecting misconduct before it occurs. Kaptein (2014) stressed a logical link between an ethics and compliance program's influence and the corporate ethical culture. My findings showed that EO duties included weekly, monthly, quarterly, and annual reporting ethics inquiries and incidences as they occurred. All eight participants reported they used a ticketing system that varied in sophistication to capture ethics inquiries, provide guidance, monitor outcomes,

improve training materials, communicate with executive-level leadership, and influence

decision-making and ethical behavior.

**Finding 3: The Definition of the EO Role was Consistent Across Corporate and**

**Government Programs**

My sample included participants from corporate and government organizations.

This variation provided a few differences between the two settings; however, most of

their perceptions were consistent across all eight participants. My sample demonstrated a

50% split, with half coming from a legal background and half having a business,

accounting, or project management background. This finding supports Kavanagh's

(2008) statement that EOs come from legal, financial, human resources, and auditing

backgrounds. Further, my second key finding demonstrated that guidelines and governing

adherence to those regulations and policies consume a large majority of the EO's focus.

Therefore, from a legal perspective, monitoring compliance at the local, state, and federal

levels is consistent with my findings.

In addition, I expected to find that perceptions supported the notion that the EO

plays a dual role between EO duties and other disciplines such as legal counsel, auditor,

or human resources. According to Weber and Wasieleksi (2013), the EO role relies

mainly on a business ethics view to guide the compliance program and ethics code of

conduct. Aznar and Vaccaro (2015) posited that the increased demand on the EO to

remain knowledgeable about compliance and regulatory requirements extends the EO's

duties beyond traditional expectations. My respondents perceived this dual role as an

opportunity to legitimize the ethics inquiries they receive and reinforce the guidelines in their responses and reporting mechanisms to leadership.

All eight participants perceived their role as a point of contact for the entire organization as the face and mouth of ethics. Participants indicated they are required to listen with an open mind and act in an advisor capacity, assisting in interpreting the guidelines, regulations, and policies while remaining nonjudgmental or politically biased. Also included in their duties was attending meetings without participating in decision-making activities to ensure they did not introduce personal biases.

## Limitations of the Study

Limitations are restrictions in the study where the researcher has no control (Rudestam & Newton, 2007). Limitations to the scope of this study included EOs meeting a pre-established set of criteria who were selected using purposive and snowball sampling approaches. LinkedIn was my main platform for contacting potential participants. Email and LinkedIn in-messages served as my primary medium for communication.

I identified some limitations to this study in Chapter 1 that could limit the extent of my research. Also, I identified additional limitations while conducting my research. The first limitation specified in Chapter 1 and associated with the IPA research approach was that some participants might not fully share their experiences (Gee et al., 2013) and hold back critical details during the interviews. To minimize this potential limitation, I allowed participants to set the schedule for the discussion during a time they would have the privacy to respond openly. Also, I use a virtual face-to-face setting to assist with the

participant's comfort within their natural environment. This limitation did not appear to hinder my ability to capture the meanings of the experiences expressed during the interview or my ability to aggregate themes from participant statements, phrases, or keywords.

The second limitation was that some participants may provide pre-rehearsed responses or tailor their behavior during the interview based on regulatory requirements to participants. All my participants were randomly selected, willing to volunteer, and not required to engage in the study by their organization to minimize this limitation. Reflexivity was a mechanism to assist me in remaining neutral and being self-aware of my potential biases, where I frequently reviewed my notes and the transcripts throughout the data collection process. Further, I validated the interview transcripts against the audio recordings, and the participants had the opportunity to member-check the written transcript to ensure the accuracy of the data collection and analysis steps.

The third limitation of this study was that the IPA approach offered a one-dimensional participant perspective. My sample consisted of a homogenous group with shared experiences of the EO role. These similar experiences provided the opportunity to explore the EO's typical day in-depth, regardless of the variations in corporate and government settings, years of expertise, and backgrounds among the participants.

A fourth limitation of this study included the struggle to find EOs willing to participate. My scope of reach into this narrow community limited my ability to secure participants and elongated my data collection and analysis phases. To minimize the impacts, I relied on snowball sampling and requested referrals from those consenting to

participate. Also, I loosened the selection criteria by removing the requirement for a participant to belong to one of the following communities of practice: ECOA, SCCE, SOC, or HCCA.

## Recommendations

Hoffman and Rowe (2007) identified that the EO's most important responsibility was to monitor executive-level conduct and elaborated that everyone, regardless of reporting structure, is ethically accountable. Further, EOs must be empowered with the authority to execute their job duties without repercussions and have open support from the board of directors. Although the literature is abundant on ethical leadership and compliance and ethics programs, there is a gap in the literature on the EO as a standalone influence on executive-level leadership ethical behavior. I chose to use an ethical leadership conceptual framework to improve the understanding and knowledge of the strategies utilized by EOs for North American-based companies by delving into their perceptions of their influence on ethical behavior and their role, and I shared those results and interpretations in this chapter. Expanding on other prior research and this study, I have several recommendations for future research.

The first recommendation is to obtain participants who would broaden the diversity of the sample while remaining homogenous related to understanding the lived experiences of the EO and their influence on executive-level leadership behavior. Future research might obtain the membership data of the SCCE or HCCA and use that list to solicit participants. This approach would expand the selection criteria to include EOs

with organizations whose primary markets are outside North America, providing an

element of diversity not demonstrated in my study.

I captured the hierarchical reporting structures and EOs' perception of their

interaction with the executive level. Still, it did not delve into those occurrences and the

outcomes of each interpersonal strategy. Therefore, a second recommendation is to

expand on this qualitative study, tailoring the focus of the interview protocol to explore

the EO's engagement with the executive level and the auditing strategies used by the EO.

While touching on executive-level engagement, I did not focus solely on analyzing the

EO's influence and approaches to navigate the limitations of potential reporting

structures.

A third recommendation is to focus on duties other than the EO's tasks to guide

regulatory requirements and govern adherence to organizational ethical expectations and

local, state, and federal laws. A key finding of this study was that the majority of the EO

role was providing guidance, assisting interpretations, and governing the behavior to the

guidelines. I would recommend further research to expand the exploration into other

duties outside of guideline governance, training, and reporting incidents. This approach to

future research could enhance understanding of the EO's role by understanding

prioritization conflicts and potential knowledge-building opportunities for the EO.

In this study, I used the qualitative IPA approach to explore the perceptions of

EOs relating to their influence and effectiveness on executive-level ethical behavior. The

qualitative approach aligned with my quest to explore participants' perceptions,

interpretations, and meanings of their experiences (Astin & Long, 2009). Although there

is abundant quantitative and qualitative research on ethical leadership, I recommend a future study using the qualitative ethnographic approach where inserting the researcher into the participant's daily life would offer the ability to absorb through observations the meanings of the EO experiences when engaging with executive-level leadership. This proximity would allow the researcher to be immersed in the experience and capture participants' perceptions as they experience the phenomena.

Lastly, I recommend using a sample of EOs from companies with prior misconduct infractions who have endured financial penalties based on the FSG requirements for future research. Views into this sample could provide the opportunity to expand the understanding from the lessons learned perspective, allowing scholars to gather insight into the effectiveness of the misconduct penalties and impacts on an organization and the role the EO plays in that experience. Further, it would be beneficial to compare studies with companies that have and those that have not experienced a misconduct infraction.

### Implications

The study provides insight into the perceptions of a small sample of EOs responsible for the ethics programs within their organizations doing business in North America. My research indicated the EOs perceived their interactions with the executive level to be effective. Most of their duties centered on answering ethical inquiries, socializing guidelines, and governing behavior based on those guidelines. My findings may be significant to social change, theory, and practice.

**Significance to Social Change**

According to Treviño and Weaver (1999), there is potential that positive social change would occur from a value-based ethical culture. Accepting ethical and unethical behavior is broadly defined based on Society's moral norms (Treviño, den Nieuwenboer, et al., 2014). Conflicts arise when societal norms and organizational norms are inconsistent. Brown et al. (2005) postulated that executives in high-power roles tend to ignore social influences and are less likely to follow the behavior of others, while other non-executives tend to adjust their behavior to confirm the local norms. Culture shapes the values placed on ethics and acceptable perspectives. Societal norms link to variations in the expectations of leaders (Resick et al., 2006). Therefore, the insights from this study could help shape executive ethical behavior that influences social norms and the value of ethical expectations based on Brown and Treviño's (2006) assertion that the leader's morality is a visible role model of ethical behavior to the community.

The purpose of this qualitative IPA study was to explore the lived experiences of EOs regarding their interactions with executives. This study may contribute to positive social change by enhancing the understanding of the EO in shaping corporate leadership's social views and increasing employee commitment through a heightened sense of ethical awareness, improved ethical decision-making, and reduced unethical misconduct. These changes in social beliefs and ethical understanding could impact the local communities as individuals apply their professional, ethical awareness to their personal experiences with family, friends, and community activities. Further, insights from this study could help shape executive ethical conduct, improve the leadership process, change ethics training

approaches, evolve the role of the EO, and insert ethics aspects into executive hiring practices and development programs, resulting in positive social change.

**Significance to Theory**

There is a gap in understanding the EO role relative to the constructs of ethical leadership theory. The conceptual framework for this study used Brown and Treviño 's (2006) principles of ethical leadership theory. They asserted that ethical leadership was evident in executives' characteristics such as trust, integrity, role modeling ethical behavior through their actions, and the perceptions of ethical status learned through social experiences. DeConinck (2015) found ethical leadership principles within a social learning context based on the moral person and moral manager principles. Brown and Treviño postulated six core principles: trust, fairness, honesty, respect, integrity, and support, which established a framework of right vs. wrong (Brown & Mitchell, 2010).

This study addressed the research problem regarding the lack of knowledge and understanding of EO's experiences, their perceptions about driving behavior effectively, and their ability to influence executives on matters of ethical guidelines. I applied a conceptual framework of ethical leadership theory in analyzing the transcripts of eight EOs from companies with an established compliance and ethics program. Using this unique lens to study how EOs interacted with executives allowed me to discover that these participants perceived their influence in high regard and their frequency of engagement to vary from daily to quarterly.

My research extended the body of knowledge about ethical leadership by exploring the EO role with a focus on the effectiveness of steering the ethical behavior of

executive leaders. A deeper understanding of the EO role could reduce unethical

behavior, enhance ethics training programs, and improve the ability to sustain ethical

cultures (Treviño, den Nieuwenboer, et al., 2014). Such improvement could add value

and strengthen the EO's legitimacy toward influencing ethical leadership behavior

(Treviño, den Nieuwenboer, & Kish-Gephart, 2014) and expand the tools available to

help grow the EO's influence and protect the overall corporate profitability.

**Significance to Practice**

The creation of the EO role was intended to serve as a watchdog (Morf et al.,

1999) or enforcer (Pendse, 2012), guiding ethical behavior to minimize misconduct and

protecting an organization's reputation and bottom line (Sampson, 2016). It could be

practical to enhance the role structure to include multiple EO roles that split the role

expectations: for example, one to focus on the legalities of the duties and expected

knowledge and one who focuses on reporting, training, auditing of the program's

components, and other administrative responsibilities of the role. This divided approach

to the EO role would support Taylor's (2015) notion that the EO role is spread too thin to

be adequate with current structures. This structural divide could also help with Burdon

and Harvey's (2015) noted challenge that the EO role models struggle to keep up with the

ever-changing regulations and social expectations to effectively protect an organization's

reputation and leaders.

Further, ethics training primarily focuses on the employee (Weber & Wasieleski,

2013) by emphasizing ethical resolutions when faced with at-work dilemmas and

reporting misconduct. Extending this logic and tailoring the executive-level training

approach to include higher-level factors from a role-based lens would consist of risk content associated with such aspects as bribery, money laundering, and conflict of interest topics to provide ethical guardrails and guide leadership behaviors to avoid misconduct before infractions occur and the assessment of penalties.

### Conclusions

I conducted this qualitative IPA study to better understand the experiences and perceptions of those serving in the EO role who govern the compliance and ethics program and drive the ethical culture of their organization. My research showed that all eight EOs in my sample perceived their interaction with the executive level and their ability to influence executive behavior as effective. It was evident that when comparing the responses from my participants of those in a corporate setting to those in a government setting, there were little perceived differences.

I found that the EO role mostly centered on answering ethics inquiries, socializing guideline expectations, and governing adherence to those guidelines. This finding lent itself to the notation that EOs perform a dual role of legal counsel and other disciplines such as accounting, human resources, or project management. The EO is not required to be from a legal background; however, the EO must remain knowledgeable of the local, state, and federal regulations and laws. Also, they must have in-depth knowledge of the company's code of conduct and other operating policies and procedures. Further, I found that reporting inquiries and incidents and providing ethics training were duties the EO performed extensively. These activities enhanced communication with executives and shaped the organization's ethics culture.

As I reflect on my findings and my experience while engaging the participants, I ponder the notion that although the scholarly literature shows the evolution of corporate ethics moving from a compliance-based checklist approach of the early 1990s to a value-based approach of the 2020s, I question if this evolution has created a new blended mixture of both that emphasizes compliance with regulations from a checklist perceptive while focuses on training, education, reporting, hotlines, and audits found at the forefront of a values-based approach and supporting the employee at all levels of an organization.

Further, the EO's role as the watchdog over an organization's ethics culture (Morf et al., 1999) and guidelines enforcement (Pendse, 2012) to deter misconduct and protect the organization's leaders (Sampson, 2016) could benefit from enhancements to split the role into two tracks providing the opportunity for EOs to focus on guidelines and everything else without being stretched too thin across their duties. Currently, the role expectations include remaining knowledgeable of regulations, laws, and policies. While doing so, the EO must be an expert on inquiry and incident reporting, ethics training, and executing audits of the compliance and ethics program's components, presenting the challenge of keeping up with the ever-changing regulations and social norms (Burdon & Harvey, 2015).

References

Adobor, H. (2006). Exploring the role performance of corporate ethics officers. *Journal of Business Ethics*, 69(1), 57–75. https://doi.org/10.1007/s10551-006-9068-7

Adobor, H. (2019). Corporate ethics officers. In D. C. Poff & A. C. Michalos (Eds.), Encyclopedia of business and professional ethics (pp. 1–6). Springer International Publishing. https://doi.org/10.1007/978-3-319-23514-1_66-1

Alahmad, A. (2011). To be ethical or not to be: An international code of ethics for leadership. *Journal of Diversity Management*, 5(1). https://doi.org/10.19030/jdm.v5i1.803

Alase, A. (2017). The interpretative phenomenological analysis (IPA): A guide to a good qualitative research approach. *International Journal of Education and Literacy Studies*, 5(2), 9. https://doi.org/10.1016/j.obhdp.2013.12.003

Ambrose, M. L., Schminke, M., & Reynolds, S. J. (2014). Behavioral ethics: New frontiers. *Organizational Behavior and Human Decision Processes*, 123(2), 77–78. https://doi.org/10.1016/j.obhdp.2013.12.003

Astin, F., & Long, A. F. (2009). Qualitative research: An overview. *British Journal of Cardiac Nursing*, 4(8), 390–393. https://doi.org/10.12968/bjca.2009.48.43498

Aznar, E., & Vaccaro, A. (2015). Make way for the chief integrity officer: Beyond Compliance, *IESE Insight*, 27, 23–30. https://doi.org/10.15581/002.art-2790

Barry, M. (2002). Why ethics & compliance programs can fail. *Journal of Business Strategy*, 23(6), 37–40. https://doi.org/10.1108/eb040287

Baskarada, S. (2014). Qualitative case study guidelines. *The Qualitative Report*.

https://doi.org/10.46743/2160-3715/2014.1008

Bennis, W. (2007). The challenges of leadership in the modern world: Introduction to the

special issue. *American Psychologist*, 62(1), 2–5. https://doi.org/10.1037/0003-

066X.62.1.2

Beu, D., & Buckley, M. R. (2001). The hypothesized relationship between accountability

and ethical behavior. *Journal of Business Ethics*, 34(1), 57–73.

https://doi.org/10.1023/A:1011957832141

Bloomberg, L. D., & Volpe. (2008). *Completing your qualitative dissertation: A

roadmap from beginning to end (annotated edition)*. SAGE Publications.

Bolt-Lee, C. E., Yi-Jing Wu, & Zimmerman, A. B. (2014). Highlights of ethics research.

*Journal of Accountancy*, 217(6), 34–39.

https://www.journalofaccountancy.com/issues/2014/jun/20139009.html

Bonime-Blanc, A., & Coyne II, M. (2014). A life-cycle guide to ethics and compliance

programs. *NACD Directorship*, 40(6), 72–75.

Brooks, L. J. (1989). Corporate ethical performance: Trends, forecasts and outlooks.

*Journal of Business Ethics*, 8(1), 31–38. https://doi.org/10.1007/BF00382014

Brown, M. E., & Mitchell, M. S. (2010). Ethical and unethical leadership: Exploring new

avenues for further research. *Business Ethics Quarterly*, 20(4), 583–616.

https://doi.org/10.5840/beq201020439

Brown, M. E., & Treviño, L. K. (2006). Ethical leadership: A review and future

directions. *The Leadership Quarterly*, 17(6), 595–616.

https://doi.org/10.1016/j.leaqua.2006.10.004

Brown, M. E., Treviño, L. K., & Harrison, D. A. (2005). Ethical leadership: A social

    learning perspective for construct development and testing. *Organizational*

    *Behavior and Human Decision Processes*, 97(2), 117–134.

    https://doi.org/10.1016/j.obhdp.2005.03.002

Burdon, W. M., & Harvey, J. (2016). A plea for adoption of ethical compliance:

    Avoiding pitfalls of compliance groupthink and consulting. *Journal of Financial*

    *Crime*, 23(1), 187–200. https://doi.org/10.1108/JFC-11-2014-0049

Burnes, B., & By, R. T. (2012). Leadership and change: The case for greater ethical

    clarity. *Journal of Business Ethics*, 108(2), 239–252.

    https://doi.org/10.1007/s10551-011-1088-2

Business ethics and compliance timeline. (2015). *Ethics & compliance initiative*.

    https://www.ethics.org/

Cantone L. (1999). Corporate compliance: Critical to organizational success. *Nursing*

    *Economic$*, 17(1), 15-52.

Carroll, A. B. (1991). The pyramid of corporate social responsibility: Toward the moral

    management of organizational stakeholders. *Business Horizons*, 34(4), 39–48.

    https://doi.org/0.1016/0007-6813(91)90005-G

Chavez, G., Wiggins, R., & Yolas, M. (2001). The impact of membership in the ethics

    officer association. *Journal of Business Ethics*, 34(1), 39–56.

    https://doi.org/10.1023/A:1011968010131

Chen, H., & Soltes, E. (2018). Why compliance programs fail—And how to fix them.

    *Harvard Business Review*, March-April, 116–125. https://hbr.org/2018/03/why-

compliance-programs-fail

Ciulla, J. B. (2004). *Ethics, the heart of leadership (2 edition)*. Praeger.

Ciulla, J. B. (2005). The state of leadership ethics and the work that lies before us.

*Business Ethics: A European Review*, 14(4), 323–335.

https://doi.org/10.1111/j.1467-8608.2005.00414.x

Cooper, R., Fleisher, A., & Cotton, F. A. (2012). Building connections: An interpretative

phenomenological analysis of qualitative research students' learning experiences.

*The Qualitative Report*, 17(17), 1–16. https://doi.org/ 10.46743/2160-

3715/2012.1780

Creswell, J. W. (2009). *Research design: Qualitative, quantitative, and mixed methods*

*approaches (3rd ed.).* SAGE Publications Ltd.

Cunliffe, A. L., & Karunanayake, G. (2013). Working within hyphen-spaces in

ethnographic research: Implications for research identities and practice.

*Organizational Research Methods*, 16(3), 364–392.

https://doi.org/10.1177/1094428113489353

Curtin, M., & Fossey, E. (2007). Appraising the trustworthiness of qualitative studies:

Guidelines for occupational therapists. Australian Occupational Therapy Journal,

54(2), 88–94. https://doi.org/10.1111/j.1440-1630.2007.00661.x

Davidson, B. I., & Stevens, D. E. (2013). Can a code of ethics improve manager behavior

and investor confidence? An experimental study. *The Accounting Review*, 88(1),

51–74. https://doi.org/10.2308/accr-50272

Davis, J. H., Schoorman, F. D., & Donaldson, L. (1997). Toward a stewardship theory of

management. *Academy of Management Review*, 22(1), 20–47.

https://doi.org/10.5465/AMR.1997.9707180258

de Colle, S., & Werhane, P. H. (2008). Moral motivation across ethical theories: What

can we learn for designing corporate ethics programs? *Journal of Business Ethics*,

81(4), 751–764. https://doi.org/10.1007/s10551-007-9545-7

Dean, K., Beggs, J., & Keane, T. (2010). Mid-level managers, organizational context, and

(un)ethical encounters. *Journal of Business Ethics*. 97(1), 51-69.

https://doi.org/10.1007/s10551-010-0495-0

DeConinck, J. B. (2015). Outcomes of ethical leadership among salespeople. *Journal of

Business Research*, 68(5), 1086–1093.

https://doi.org/10.1016/j.jbusres.2014.10.011

DeMott, D. A. (2013). The crucial but (potentially) precarious position of the chief

compliance officer. *Brooklyn Journal of Corporate, Financial & Commercial

Law*, 8(1), 56–79.

Divers, S. (2015, March). Balancing Best Practices and Reality in Compliance.

*Compliance Week*, 12(134), 43.

https://link.gale.com/apps/doc/A410139091/EAIM?u=minn4020&sid=ebsco&xid

=44120b26

Dworkin, S. L. (2012). Sample size policy for qualitative studies using in-depth

interviews. *Archives of Sexual Behavior*, 41(6), 1319–1320.

https://doi.org/10.1007/s10508-012-0016-6

Englander, M. (2012). The interview: Data collection in descriptive phenomenological

human scientific research*. *Journal of Phenomenological Psychology*, 43(1), 13–

35. https://doi.org/10.1163/156916212X632943

Federal Sentencing Guidelines Manual. (2015). United States Sentencing Commission.

https://www.ussc.gov/guidelines/guidelines-archive/2015-guidelines-manual

Ferrell, O. c., LeClair, D. T., & Ferrell, L. (1998). The federal sentencing guidelines for

organizations: A framework for ethical compliance. *Journal of Business Ethics*,

17(4), 353–363. https://doi.org/10.1023/A:1005786809479

Forbes Insights. (2019, May 27). *Forbes insights: Rise of the chief ethics officer*. Forbes.

https://www.forbes.com/sites/insights-intelai/2019/03/27/rise-of-the-chief-ethics-

officer/

Gamez-Djokic, M., & Molden, D. (2016). Beyond affective influences on deontological

moral judgment: The role of motivations for prevention in the moral

condemnation of harm. *Personality and Social Psychology Bulletin*, 42(11),

1522–1537. https://doi.org/10.1177/0146167216665094

Garrity-Rokous, G., & Baker, H. F. (2017). Solving ethical "decoupling": A

programmatic approach to ensuring both compliance and ethics. *University of

Toledo Law Review*, 48(3), 453–463.

https://heinonline.org/HOL/LandingPage?handle=hein.journals/utol48&div=32&i

d=&page=

Gee, J., Loewenthal, D., & Cayne, J. (2013). Phenomenological research: The case of

empirical phenomenological analysis and the possibility of reverie. *Counselling

Psychology Review*, 28(3), 52–62. https://psycnet.apa.org/record/2013-41437-006

Gherghel, A.-M. (2010). Ethics and compliance officer's role in 'healing' organizational

culture. *Alexandru Ioan Cuza University Press*, 1(1), 153–162.

https://doaj.org/article/f93e6ad48bef44bfba57dc080855b2fc

Gill, M. J. (2014). The possibilities of phenomenology for organizational research.

*Organizational Research Methods*, 17(2), 118–137.

https://doi.org/10.1177/1094428113518348

Giorgi, A. (2012). The descriptive phenomenological psychological method. *Journal of

Phenomenological Psychology*, 43(1), 3–12.

https://doi.org/10.1163/156916212X632934

Glapion, M. (2014, July 2). Effectiveness. *Compliance Week*, 20.

Gnazzo, P. J. (2011). The chief ethics and compliance officer: A test of endurance.

*Business and Society Review*, 116(4), 533. https://doi.org/10.1111/j.1467-

8594.2011.00396.x

Hansen, S. D., Alge, B. J., Brown, M. E., Jackson, C. L., & Dunford, B. B. (2013).

Ethical leadership: Assessing the value of a multifoci social exchange perspective.

*Journal of Business Ethics*, 115(3), 435–449. https://doi.org/10.1007/s10551-012-

1408-1

Hauser, C. (2020). From preaching to behavioral change: Fostering ethics and

compliance learning in the workplace. *Journal of Business Ethics*, 162(4), 835–

855. https://doi.org/10.1007/s10551-019-04364-9

Health Care Compliance Association. (2023). *About HCCA*. https://www.hcca-

info.org/about-hcca

Hoffman, W. M. (2010). Repositioning the corporate ethics officer. *Business Ethics Quarterly*, *20*(4), 744–745.

Hoffman, W. M., & Rowe, M. (2007). The ethics officer as agent of the board: Leveraging ethical governance capability in the post-Enron corporation. *Business & Society Review*, 112(4), 553–572. https://doi.org/10.1111/j.1467-8594.2007.00309.x

Hoffman, W. M., Neill, J. D., & Stovall, O. S. (2008). An investigation of ethics officer independence. *Journal of Business Ethics*, *78*(1–2), 87–95. https://doi.org/10.1007/s10551-006-9312-1

Hogenbirk, S., & Dun, D. H. van. (2020). Innovative ethics officers as drivers of effective ethics programs: An empirical study in the Netherlands. *Business Ethics: A European Review*, 1–14. https://doi.org/10.1111/beer.12310

Hopkins, S. L. (2013). How effective are ethics codes and programs? Many companies craft codes of ethics and establish the related ethics and compliance programs to enforce the codes. But do they actually work in practice to accomplish what they set out to do? *Financial Executive*, 29(2), 42–45. https://link.gale.com/apps/doc/A322028777/AONE?u=googlescholar&sid=bookmark-AONE&xid=286c6b37http://ezp.waldenulibrary.org/login?url=http://search.ebscohost.com/login.aspx?direct=true&db=bth&AN=85919969&site=eds-live&scope=site

Izraeli, D., & BarNir, A. (1998). Promoting ethics through ethics officers: A proposed

profile and an application. *Journal of Business Ethics*, 17(11), 1189. https://doi.org/10.1023/A:1005770732000

Jacob, S., & Furgerson, S. P. (2012). Writing interview protocols and conducting interviews: Tips for students new to the field of qualitative research. *The Qualitative Report*, 17(42), 1–10. https://doi.org/10.46743/2160-3715/2012.1718

Jaeger, J. (2015, July). Compliance trends in 2015: More IT uncertainty. *Compliance Week*, 12(138), 48. https://www.complianceweek.com/compliance-trends-in-2015-more-authority-more-it-uncertainty/3315.article

Jorgensen, U. (2001). Greening of technology and ecotechnology. In *International encyclopedia of the social & behavioral sciences* (pp. 6393–6396). Elsevier. https://doi.org/10.1016/B0-08-043076-7/04181-4

Kanungo, R. N., & Mendonca, M. (1996). *Ethical dimensions of leadership*. SAGE Publications.

Kaptein, M. (2009). Ethics programs and ethical culture: A next step in unraveling their multi-faceted relationship. *Journal of Business Ethics*, 89(2), 261–281. https://doi.org/10.1007/s10551-008-9998-3

Kaptein, M. (2014). The effectiveness of ethics programs: The role of scope, composition, and sequence (SSRN Scholarly Paper ID 2464004). *Social Science Research Network*. http://papers.ssrn.com/abstract=2464004

Kavanagh, S. (2008). Paper discusses the role of a chief ethics and compliance officer. Professional and Personal Skills and Qualifications that Are Simply a Must for the Job. *Journal of Health Care Compliance*, 10(1), 25–75.

Khaled, W. B., & Gond, J.-P. (2020). How do external regulations shape the design of

    ethical tools in organisations? An open polity and sociology of compliance

    perspective. *Human Relations*, 73(5), 653–681.

    https://doi.org/10.1177/0018726719828437

Kim, Y. (2011). The pilot study in qualitative inquiry identifying issues and learning

    lessons for culturally competent research. *Qualitative Social Work*, 10(2), 190–

    206. https://doi.org/10.1177/1473325010362001

Koerber, A., & McMichael, L. (2008). Qualitative sampling methods: A primer for

    technical communicators. *Journal of Business and Technical Communication*,

    22(4), 454–473. https://doi.org/10.1177/1050651908320362

Kusserow, R. P., & Boateng, C. (2015). Filling a gap between permanent compliance

    officers: Hiring outside experts versus using internal staff. *Journal of Health Care*

    *Compliance*, 17(4), 37–54.

Larkin, M., Shaw, R., & Flowers, P. (2019). Multiperspectival designs and processes in

    interpretative phenomenological analysis research. *Qualitative Research in*

    *Psychology*, 16(2), 182–198. https://doi.org/10.1080/14780887.2018.1540655

Lee, P. T. (2011). Business and Ethics. *International Forum Journal*, 14(2), 39–54.

    http://ojs.aiias.edu/index.php/iforum/article/view/143

Leung, L. (2015). Validity, reliability, and generalizability in qualitative research.

    *Journal Of Family Medicine And Primary Care*, 4(3), 324–327.

    https://doi.org/10.4103/2249-4863.161306

Locke, L. F., Spirduso, W. W., & Silverman, S. J. (2013). *Proposals that work: A guide*

*for planning dissertations and grant proposals*. SAGE Publications.

Lopez, K. A., & Willis, D. G. (2004). Descriptive versus interpretive phenomenology: Their contributions to nursing knowledge. *Qualitative Health Research*, 14(5), 726–735. https://doi.org/10.1177/1049732304263638

LRN. (2016). *2016 ethics and compliance effectiveness report*. LRN Corporation. www.lrn.com

LRN. (2020). *Confronting the root causes of misconduct: 2020 LRN ethics and compliance program effectiveness report*. LRN Corporation. https://pages.lrn.com/hubfs/2020%20LRN%20Ethics%20and%20Compliance%20PEI%20Report.pdf

LRN. (2022) *2022 ethics and compliance program effectiveness report*. LRN Corporation. www.lrn.com

Marsh, C. (2013). Business executives' perceptions of ethical leadership and its development. *Journal of Business Ethics*, 114(3), 565–582. http://doi.org/10.1007/s10551-012-1366-7

Martin, S. L. (2015). Compliance officers: More jobs, more responsibility, more liability. *Notre Dame JL Ethics & Pub*. Pol'y, 29, 169. http://heinonline.org/hol-cgi-bin/get_pdf.cgi?handle=hein.journals/ndlep29&section=6

Mason, M. (2010). Sample size and saturation in PhD studies using qualitative interviews. *Forum Qualitative Sozialforschung*, 11(3). http://www.qualitative-research.net/

Mayoh, J., & Onwuegbuzie, A. J. (2015). Toward a conceptualization of mixed methods

phenomenological research. *Journal of Mixed Methods Research*, 9(1), 91–107. https://doi.org/10.1177/1558689813505358

Mazur, T. C. (2017). *Ethics Officers*. In A. Farazmand (Ed.), Global encyclopedia of public administration, public policy, and governance (pp. 1–7). Springer International Publishing. https://doi.org/10.1007/978-3-319-31816-5_2378-1

McAlpine, L. (2016). Why might you use narrative methodology? A story about narrative. *Eesti Haridusteaduste Ajakiri. Estonian Journal of Education*, 4(1), Article 1. https://doi.org/10.12697/eha.2016.4.1.02b

Mey, M., Lloyd, H., & Ramalingum, K. (2014). Ethical leadership essential for an ethical environment. *Mediterranean Journal of Social Sciences*. https://doi.org/10.5901/mjss.2014.v5n20p897

Miller, G. P. (2017). Compliance: Past, present and future. *University of Toledo Law Review*, 48(3), 437–451. https://heinonline.org/HOL/LandingPage?handle=hein.journals/utol48&div=31&id=&page=

Morf, D. A., Schumacher, M. G., & Vitell, S. J. (1999). A survey of ethics officers in large organizations. *Journal of Business Ethics*, 20(3), 265–271. https://doi.org/10.1023/A:1006000131803

Moustakas, C. (1994). *Phenomenological Research Methods*. SAGE Publications.

Murphy, D. E. (2002). The federal sentencing guidelines for organizations: A decade of promoting compliance and ethics symposium: legal issues and sociolegal consequences of the federal sentencing guidelines. *Iowa Law Review*, 87, 697–

720. https://heinonline.org/HOL/P?h=hein.journals/ilr87&i=709

Muylaert, C. J., Sarubbi Jr, V., Gallo, P. R., Neto, M. L. R., & Reis, A. O. A. (2014).

Narrative interviews: An important resource in qualitative research. *Revista Da Escola de Enfermagem Da USP*, 48(spe2), 184–189.

https://doi.org/10.1590/S0080-623420140000800027

Myers, R. (2003). Ensuring ethical effectiveness. (Cover story). *Journal of Accountancy*, 195(2), 28.

https://www.journalofaccountancy.com/issues/2003/feb/ensuringethicaleffectiveness.html

Parsons, K., Biskup, R., & Lamm, R. (2019, October 15). Board oversight of corporate compliance: Is it time for a refresh? *The Harvard Law School Forum on Corporate Governance*. https://corpgov.law.harvard.edu/2019/10/15/board-oversight-of-corporate-compliance-is-it-time-for-a-refresh/

Patel, R. S., Tarrant, C., Bonas, S., & Shaw, R. L. (2015). Medical students' personal experience of high-stakes failure: Case studies using interpretative phenomenological analysis. *BMC Medical Education*, 15(86).

https://doi.org/10.1186/s12909-015-0371-9

Patton, M. Q. (2002). *Qualitative research and evaluation methods*. Sage Publications.

Pendse, S. (2012). Ethical hazards: A motive, means, and opportunity approach to curbing corporate unethical behavior. *Journal of Business Ethics*, 107(3), 265–279. https://doi.org/10.1007/s10551-011-1037-0

Pfeffer, J. (2015). *Leadership BS: Fixing workplaces and careers one truth at a time*.

HarperCollins.

Phillippi, J., & Lauderdale, J. (2017). A guide to field notes for qualitative research: Context and conversation. *Qualitative Health Research*, *28*(3), 381–388. https://doi.org/10.1177/1049732317697102

Pies, I., Beckmann, M., & Hielscher, S. (2009). Value creation, management competencies, and global corporate citizenship: An ordonomic approach to business ethics in the age of globalization. *Journal of Business Ethics*, 94(2), 265–278. https://doi.org/10.1007/s10551-009-0263-1

Potts, S. D., & Matuszewski, I. L. (2004). Ethics and corporate governance. *Corporate Governance: An International Review*, 12(2), 177–179. https://doi.org/10.1111/j.1467-8683.2004.00357.x

Resick, C. J., Hanges, P. J., Dickson, M. W., & Mitchelson, J. K. (2006). A Cross-cultural examination of the endorsement of ethical leadership. *Journal of Business Ethics*, 63(4), 345–359. https://doi.org/10.1007/s10551-005-3242-1

Roberts, T. (2013). Understanding the research methodology of interpretative phenomenological analysis. *British Journal of Midwifery*, 21(3), 215–218. https://doi.org/10.12968/bjom.2013.21.3.215

Rudestam, K. E., & Newton, R. R. (2007). *Surviving your dissertation: A comprehensive guide to content and process (3rd ed.)*. SAGE Publications.

Sampson, S. (2016). The "right way": Moral capitalism and the emergence of the corporate ethics and compliance officer. *Journal of Business Anthropology*, 2(1), 65–86. https://doi.org/10.22439/jba.v2i1.5009

Schiermeier, Q. (2015). The science behind the Volkswagen emissions scandal. *Nature*. https://doi.org/10.1038/nature.2015.18426

Schwartz, M. S. (2013). Developing and sustaining an ethical corporate culture: The core elements. *Business Horizons*, 56(1), 39–50. https://doi.org/10.1016/j.bushor.2012.09.002

Shenton, A. K. (2004). Strategies for ensuring trustworthiness in qualitative research projects. *Education for Information*, 22(2), 63–75. https://doi.org/10.3233/EFI-2004-22201

Smith, J. A. (2011). Evaluating the contribution of interpretative phenomenological analysis. *Health Psychology Review*, 5(1), 9–27. https://doi.org/10.1080/17437199.2010.510659

Smith, J. A. (2015). *Qualitative psychology: A practical guide to research methods (3rd ed.)*. Sage Publications.

Smith, J. A., Flowers, P., & Larkin, M. (2009). *Interpretative phenomenological analysis: Theory, method and research*. SAGE Publications.

Smith, J. A., & Pietkiewicz, I. (2014). A practical guide to using interpretative phenomenological analysis in qualitative research psychology. *Czasopismo Phsychoogiczne Psychological Journal*, 20(1), 7–14. https://doi.org/10.14691/CPPJ.20.1.7

Society of Corporate Compliance and Ethics. (2023). *About SCCE*. https://www.corporatecompliance.org/about-scce

Soltani, B. (2014). The anatomy of corporate fraud: A comparative analysis of high

profile American and European corporate scandals. *Journal of Business Ethics*, 120(2), 251–274. https://doi.org/10.1007/s10551-013-1660-z

Stansbury, J., & Barry, B. (2007). Ethics programs and the paradox of control. *Business Ethics Quarterly*, 17(2), 239–261. https://doi.org/10.5840/beq200717229

Stevens, B. (2008). Corporate ethical codes: Effective instruments for influencing behavior. *Journal of Business Ethics*, 78(4), 601–609. https://doi.org/10.1007/s10551-007-9370-z

Tanner, C., Brügger, A., van Schie, S., & Lebherz, C. (2010). Actions speak louder than words: The benefits of ethical behaviors of leaders. *Zeitschrift Für Psychologie/Journal of Psychology*, 218(4), 225–233. https://doi.org/10.1027/0044-3409/a000032

Taylor, S. L. (2015). Help! I have to eat an elephant. *Journal of Health Care Compliance*, 17(4), 17–51.

Toor, S.-R., & Ofori, G. (2009). Ethical leadership: Examining the relationships with full range leadership model, employee outcomes, and organizational culture. *Journal of Business Ethics*, 90(4), 533–547. https://doi.org/10.1007/s10551-009-0059-3

Treviño, L. K., den Nieuwenboer, N. A., & Kish-Gephart, J. J. (2014). (Un)Ethical behavior in organizations. *Annual Review of Psychology*, 65(1), 635–660. https://doi.org/10.1146/annurev-psych-113011-143745

Treviño, L. K., den Nieuwenboer, N. A., Kreiner, G. E., & Bishop, D. G. (2014). Legitimating the legitimate: A grounded theory study of legitimacy work among ethics and compliance officers. *Organizational Behavior and Human Decision*

*Processes*, 123(2), 186–205. https://doi.org/10.1016/j.obhdp.2013.10.009

Treviño, L. K., & Weaver, G. R. (1999). Compliance and values-oriented ethics

programs: Influences on employees' attitudes and behavior. *Business Ethics*

*Quarterly*, 9(2), 315–335. https://doi.org/10.2307/3857477

Treviño, L. K., Weaver, G. R., Gibson, D. G., & Toffler, B. L. (1999). Managing ethics

and legal compliance: What works and what hurts. *California Management*

*Review*, 41(2), 131. https://doi.org/10.2307/41165990

van den Akker, L., Heres, L., Lasthuizen, K., & Six, F. (2009). Ethical leadership and

trust: It's all about meeting expectations. *International Journal of Leadership*

*Studies*, *5*(2), 102–122.

http://www.regent.edu/acad/global/publications/ijls/new/vol5iss2/IJLS_vol5_iss2

_akker_ethical_leadership.pdf

Voegtlin, C., Patzer, M., & Scherer, A. G. (2011). Responsible leadership in global

business: A new approach to leadership and its multi-level outcomes. *Journal of*

*Business Ethics*, 105(1), 1–16. https://doi.org/10.1007/s10551-011-0952-4

Weaver, G. R., Treviño, L. K., & Cochran, P. L. (1999). Corporate ethics practices in the

mid-1990s: An empirical study of the Fortune 1000. *Journal of Business Ethics*,

18(3), 283–294. https://doi.org/10.1023/A:1005726901050

Weber, J. (2015). Investigating and assessing the quality of employee ethics training

programs among us-based global organizations. *Journal of Business Ethics*,

129(1), 27–42. https://doi.org/10.1007/s10551-014-2128-5

Weber, J., & Wasieleski, D. (2013). Corporate ethics and compliance programs: A report,

analysis and critique. *Journal of Business Ethics*, 112(4), 609–626.

https://doi.org/10.1007/s10551-012-1561-6

Weller, A. (2017). Professional associations as communities of practice: Exploring the boundaries of ethics and compliance and corporate social responsibility. *Business and Society Review*, 122(3), 359–392. https://doi.org/10.1111/basr.12120

Yin, R. K. (2014). Case study research: Design and methods (5 edition). *SAGE Publications*.

Zhang, Y., He, B., & Sun, X. (2018). The Contagion of unethical pro-organizational behavior: From leaders to followers. *Frontiers in Psychology*, 9, 1102. https://doi.org/10.3389/fpsyg.2018.01102

Appendix A: Participant Recruitment Letter

Greetings,

This letter invites you to participate in a study that explores the lived experiences of Ethic Officers or those who perform this role under another title. I am a doctoral candidate at Walden University in the Management Program specializing in Leadership and Organizational Change. I am conducting a study to examine the corporate ethics officer's effectiveness in influencing the ethical behaviors of the executive levels of leadership. There is a need for an increased understanding of this phenomenon expressed based on a lack of scholarly research found in the literature. The results of this study may illuminate a deeper understanding of the Ethics Officer role, lead to reducing corporate unethical behavior, enhance ethics training programs, and improve the ability to sustain ethical climates. Participants eligible for this study must meet all the following criteria: serves or has served in the Ethics Officer role or a similar role performing Ethics Officer responsibilities within the last 10 years, is employed, contractor or full-time, by an organization with operations in North America, is at the director level or above within the organizational hierarchy, and is a member of at least one of the following communities of practice: *Ethics Officers Association (EOA)*, *Ethics and Compliance Officers Association (ECOA)*, *Health Care Compliance Association (HCCA)*, *Sociology of Compliance (SOC)*, *or Society Of Corporate Compliance and Ethics (SCCE)*. In addition, participants cannot know me professionally or personally. To collect data, I am conducting individual 60-minute interviews that are audio-recorded via Zoom or Teams. Your identity will be masked, and all information is confidential.

If you agree to participate, kindly read the attached Informed Consent Form, and reply to this email with the words "I consent." If you have any questions, please reply to this email. Once your reply is received, I will contact you within 24-48 hours.

Thank you in advance for your consideration.

Respectfully,

Cheryl K. Douthitt
Ph.D. Candidate, Walden University

Appendix B: Participant Consent Form

You are invited to take part in a study about exploring the lived experiences of the corporate ethics officer's effectiveness in influencing the ethical behaviors of the executive levels of leadership. This form is part of a process called "informed consent" to allow you to understand this study before deciding whether to take part.

The study is seeking at least 12 volunteers who are currently serving or have served in the Ethics Officer role or a similar role performing the Ethics Officer responsibilities within the last ten years, are employed, contractor or full-time, by an organization with operations in North America, are at the director level or above within the organizational hierarchy, and is a member of at least one of the following communities of practice: *Ethics Officers Association (EOA), Ethics and Compliance Officers Association (ECOA), Health Care Compliance Association (HCCA), or Sociology of Compliance (SOC).*

This study is being conducted by a researcher named Cheryl Douthitt, who is a doctoral student at Walden University.

**Study Purpose:**
This study aims to explore the lived experiences of Ethic Officers to improve the understanding of the Ethics Officer's role as an effective influence on corporate ethical behavior. The study will examine the Ethics Officer's perceptions of their effectiveness in influencing ethical behavior within the executive levels of organizations with operations in North America with an established ethics and compliance program.

**Procedures:**
This study will involve you completing the following steps:
- read and return this Consent Form via email with the words "I consent" to the researcher using the email address below (30 minutes)
- participate in a confidential, Zoom or Teams audio-recorded interview (1 hour)
- read and provide feedback in writing via email on the interview summary and transcript (this is called member-checking and takes 20-30 minutes)
- be available for up to two short follow-up telephone calls to clarify information from the initial interview, if needed (15 minutes each; 30 minutes)

The virtual Zoom or Teams interviews will be conducted on an agreed-upon date and time to ensure a location is identified without interruption and to ensure privacy.

Here are some sample questions:

1. What does a typical day look like in your role of a corporate Ethics Officer?
2. Are you a member of ECOA, SCCE, SOC, or HCCA communities of practice?

3. How do you interact directly with the executive-level leaders within your organization?

**Voluntary Nature of the Study:**
Research should only be done with those who freely volunteer. So, everyone involved will respect your decision to join or not.

If you decide to join the study now, you can still change your mind later. You may stop at any time.

Also, declining or stopping will not negatively impact the participant's relationship with the researcher.

Please note that not all volunteers will be contacted to take part.

**Risks and Benefits of Being in the Study:**
Being in this study could involve some risk of the minor discomforts that can be encountered in daily life, such as sharing sensitive information. With the protections in place, this study would pose minimal risk to your well-being.

This study offers no direct benefits to individual volunteers. This study aims to benefit society by illuminating a deeper understanding of the Ethics Officer role, leading to reducing corporate unethical behavior, enhancing ethics training programs and executive hiring practices, and improving the ability to sustain ethical climates. Once the analysis is complete, the researcher will share the overall results with all study volunteers.

**Payment:**
Participation is strictly voluntary. No compensation will be offered for this study.

**Privacy:**
The researcher is required to protect your privacy. Your identity will be kept confidential, within the limits of the law. The researcher is only allowed to share your identity or contact info as needed with Walden University supervisors (who are also required to protect your privacy) or with authorities if court-ordered (very rare). The researcher will not use your personal information for any purposes outside of this research project. Also, the researcher will not include your name or anything else that could identify you in the study reports. If the researcher were to share this dataset with another researcher in the future, the dataset would contain no identifiers so this would not involve another round of obtaining informed consent. Data will be kept secure by password protecting the file and storing in a locked cabinet in my home office. Participant names or any other identifiable characteristics will not be used in the report. Participants will be assigned a participant number and not referred to by name or any other identifiable or traceable means. Data will be kept for a period of at least 5 years, as required by the university, then destroyed.

**Contacts and Questions:** You can ask questions of the researcher by contacting through email at Cheryl.Douthitt@Waldenu.Edu. If you want to talk privately about your rights as a participant or any negative parts of the study, you can call Walden University's Research Participant Advocate at 612-312-1210. Walden University's approval number for this study is 08-26-22-0260490. It expires on 08/25/2023.

You might wish to retain this consent form for your records. You may ask the researcher or Walden University for a copy at any time using the contact info above.

**Obtaining Your Consent**

If you feel you understand the study and wish to volunteer, please indicate your consent by replying to this email with the words, "I consent."

Appendix C: Interview Protocol

Participant Code:

Date of Interview:

Hello, my name is Cheryl Douthitt. Thank you for taking the time to answer questions regarding my study, *The Effectiveness of the Ethics Officer's Influence: An Interpretive Phenomenological Analysis Exploration*.

I will utilize an interpretive phenomenological analysis approach for my study. The interpretive phenomenological analysis approach involves looking at finding meanings embedded in everyday life experiences. It is the intent of this study to obtain a comprehensive description that could provide the basis for a reflective structural analysis that portrays the essences of the Ethic Officer's experience.

The purpose of this qualitative study is to explore the lived experiences of Ethic Officers to improve the understanding of the Ethics Officer's role as an effective influence on corporate ethical behavior. This purpose will be addressed by examining the Ethics Officer's perceptions of their effectiveness in influencing ethical behavior within the executive levels of organizations with operations in North America that have an established ethics and compliance program.

The interview should take about 45 to 60-minutes to complete and will be audio-recorded using Zoom or Teams. Interviews will be transcribed to conduct data analysis searching for themes that emerge. You will be assigned a participant code that will be used in my analysis; therefore, your identity will be masked.

Before we begin, I would like to collect some demographic information.

Demographic Information

1. What is the primary country where your organization does business?
    a. United States of America
    b. Outside of the United States of America
    c. Unknown

2. Are you a member of a community of practice? Yes or No?
    a. If yes, which one(s)?
        i. ECOA
        ii. SCCE
        iii. SOC
        iv. HCCA
        v. Other

3. What is your organizational title?
     a. Chief Ethics and Compliance Officer
     b. Chief Compliance Officer
     c. Compliance Officer
     d. Chief Ethics Officer
     e. Ethics Officer
     f. Chief Integrity Officer
     g. Chief Trust Officer
     h. Executive Vice President
     i. Vice President
     j. Senior Director
     k. Director
     l. Other

4. Do you fulfill the Ethics Officer role within your organization?
     a. Currently performing duties of the Ethics Officer
     b. Not currently, but have performed the duties of the Ethics Officer in the last 10 years
     c. Never performed the duties of the Ethics Officer

5. How many Ethics Officers are on staff at your organization?

Thank you for providing this information. If you are ready, we can begin the next portion of this interview, which should take 45 to 60-minutes.

Perspective of the ethics officer role

6. Tell me about your typical day as a corporate Ethics Officer.

7. Tell me about your direct interactions with executive-level leaders within your organization.
     a. If there are interactions,
          i. How often do you have direct interaction with executive leaders?
          ii. What ways do you interact with executive leaders?

     b. If no interactions,
          i. What levels of the organization do you interact with regularly?
          ii. How would your effectiveness benefit with direct interaction with executive leaders?
          iii. What changes would allow you to increase the interacting with executive-level leaders?

8. Tell me about your perception to influence ethical outcomes with the executive-level leaders in your organization.

9. Tell me about challenges you face in your Ethics Officer role to influence executive-level leader's ethical behavior.

10. Tell me about the approaches you use to involve the executive-level leaders in the corporate ethics program activities.

11. How do you perceive the effectiveness of the approaches mentioned in your response to question #10 toward influencing the actions of your executive-level leaders?

12. Tell me about anything you would do differently or in addition to the approaches discussed in question #10 response if you could? Why?

That concludes the interview portion of the study. I would like to ask you one more question. Based on the criteria for the study, would you recommend anyone for my study? If so, can you please supply me with their contact information?

Thank you again for your willingness to participate in my study. After 5-years, all physical data will be shredded, and electronic files will be deleted. I would like to reiterate that your identity will remain anonymous and only known to me or my non-biased research assistant who will assist with validating the accuracy of the interview transcripts and field notes. I will contact you if any follow-up information is needed and I appreciate you taking the time to assist me in my doctoral study. Thank you.

Appendix D: Research Data Collection and Analysis Audit Trail

| Participant ID | Pilot | Main | Interviewed | Transcript | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| | | | | Recoding Uploaded to Otter.ai | Sanitized | Member-Checked | Coded | Analyzed |
| PS-01 | Yes | No | Yes | Yes | Yes | Yes | Yes | Yes |
| PS-02 | Yes | No | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-01 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-02 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-03 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-04 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-05 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-06 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-07 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-08 | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| MS-09 | No | Yes | No | No | No | No | No | No |

*Note.* PS-01 and PS-02 represent the pilot study participants.