The IoIC guidance on

Ethical Practice

Institute *of* Internal Communication

Introduction by CEO – Jennifer Sproul

The Institute exists to help organisations and people succeed through promoting internal communication of the highest standards.   This guide has been created to further support the professional standards of internal communication by focussing on our ethical practice, setting out the principles and giving advice for making ethical decisions.

Ethical values provide the moral compass by which we practice and help our organisations make decisions, acting as a foundation upon which professionalism and ethical practice is promoted.

All members of the IoIC are bound by the Code of Conduct, which now incorporates these ethical principles. We look forward to working with our members to help embed and develop this new guidance to further enhance the processes, decisions, and outcomes of our profession.

**Jennifer Sproul,
Chief Executive**

What is ethical communication?

Good ethical communication is about ensuring all communication within the organisation is truthful, fair, and demonstrates respect.

The way in which an organisation communicates with its internal stakeholders is critical to building trust and positive relationships, and for individuals to feel valued and respected.

Internal communication professionals have a key role to play in championing, supporting and monitoring communication within an organisation to ensure that the highest standards are maintained across all organisational communication. We should seek to embed the principles of good ethical practice in our own work and encourage those we work alongside to adopt them.

Principles of ethical good practice

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The following table aims to sets out the principles 'To be adhered to and those principles 'to be adhered to wherever possible' as a guide to support our members.

To be adhered to	To be adhered to wherever possible
Content • Communication to be honest and accurate. Misleading statements and the omission of important information is not acceptable. • Legal requirements (e.g. GDPR requirements, announcements for quoted companies; formal consultation over issues such as TUPE or redundancies) must be maintained. • Internal communication professionals must seek and follow advice from those responsible for adherence to these requirements (e.g. HR, Legal) in advance of any communication.	• Provision of background information that gives context for a decision, including access to/inclusion of relevant data (e.g. stock market figures) in an appropriate form.
Timing of communication • Employees should be informed directly of any decisions that are likely to have a direct impact on their working or personal lives at the earliest opportunity.	• Conscious withholding of information (when there is no legal or regulatory reason to do so) risks damaging trust and relationships.
Accessibility • Channels used to communicate key information should be accessible. • All channels selected should reach all relevant employees, including those 'hard to reach' colleagues. • This includes putting in place systems to support those with particular needs, eg, provision of signers or subtitles for videos.	
Confidentiality • Confidentiality commitments to the organisation to be adhered to. • Confidentiality statements should be put in place and communicated in advance of any potentially sensitive employee feedback exercise (e.g. surveys, focus groups or other interviews). • These should be clear and specific, reiterated at the start of any process, and strictly adhered to. Examples include not reporting on the views of groups of under ten employees. • Confidentiality statements should include any specific circumstances where the agreement could not be maintained: e.g. if feedback indicates that vulnerable individuals may be at risk, or discloses unlawful activities.	
Data-gathering • Robust data gathering methods should be used and employee feedback should be reflected honestly, including how representative any data is.	
Two-way communication • It is good practice (and in some cases a legal obligation) to also provide opportunities for broader employee voice e.g. to be able to have relevant input in advance of decisions.	• Opportunities should be provided for individuals to ask questions for clarification where a message will have a direct impact.
Diversity and Inclusion • All messaging should respect the dignity of others. Offensive or derogatory language is damaging and never acceptable. • Communication should reflect and respect the diverse nature of the workforce. • Communicators must take steps to ensure no demographic groups are excluded from or disadvantaged by organisations' communication choices.	• Respect for diversity of perspectives and tolerance of difference and of dissent, in the context of guidelines that emphasise the shared importance of communicating in a way that respects others and maintains their dignity. • Creating and communicating shared guidelines applicable to all in the organisation is good practice.

Challenges for internal communicators

Ethical decision checklist

As an Institute and as a profession we recognise the challenges this brings for internal communication professionals.

Ensuring communication consistently adheres to high ethical standards brings its own challenges: a decision on when to first start to communicate a change that will impact on groups of employees will depend on a number of factors, including legal and commercial considerations, as well as the internal culture of the organisation.

In setting out these principles, we recognise that internal communication professionals are sometimes restricted to some degree in their influence within organisations, particularly when it comes to leadership and management behaviours. Professionals should seek to embed the above principles in their own work and encourage those they work alongside to adopt them. When blocked, professionals should clearly articulate to their senior stakeholders the risks an organisation takes when it chooses to communicate unethically.

Professional bravery is sometimes required in these situations, though we recognise that how much to challenge is a judgement call the individual professional must make, and that ultimately the professional's attempts to influence may not be successful. By providing this guidance and supporting members to be part of a professional community, we aim to improve professionals' ability to influence successfully.

When faced with tough choices, doing what's right can sometimes be difficult. The below checklist will help guide you in your decision-making process.

1.

Is it legal?

We should always comply with the law. Always be familiar with the relevant laws and regulations where you work. Would you be proud to tell others about your actions? If not, this course of action may not be ethical.

2.

How would it appear to the IoIC and my fellow members?

As a member of the IoIC, does this decision align with the Institute's Code of Conduct?

3.

If this was a story in the media, how would it portray me and the IoIC?

Would I be comfortable if this was the front-page story on the Daily Mail?

4.

If someone did this to me, would I think it's fair and ethical?

Take a moment to consider how you would feel if you were on the receiving end of this communication.

Potential scenarios

Ethical dilemmas are, by the very fact of being dilemmas, situations in which the right action is not immediately evident. This section, while not exhaustive, sets out to provide guidance to our members on typical ethical dilemmas that internal communications practitioners may face. Over time, further examples will be added.

Speaking truth to power

- The ability to be a 'bridge' for the organisation depends on the strength of your relationships. Building robust relationships and developing trust at all levels in an organisation should be a priority for internal communication practitioners.

- Ensure feedback is based on evidence, not anecdote.

- Use robust data gathering methods and reflect employee feedback honestly, including how representative any data is.

- Develop the skills to have challenging, evidence-based conversations.

- Agree and maintain confidentiality guidelines for all those contributing to feedback, including when under pressure.

- Learn how to give feedback without compromising confidentiality

Example

You are an internal communications business partner working for a multi-national organisation. Part of your role is to provide guidance and advice to your senior stakeholder. Your initial interactions with them are positive; they are very supportive and seem to understand the value that internal comms can bring to the organisation. They appear to be a good role model in leadership and well liked. Over the months, you become aware that not everybody has the same view of this particular stakeholder and, in fact, there is growing negative feedback about their leadership style. You are, also, not comfortable with how they talk about some employees behind their back.

What's the ethical dilemma?

Your role is to provide guidance on how their communications are being received and their style but how do you approach what is a tricky situation? Do you share the feedback? You want to be seen as a trusted advisor but are concerned that some of the feedback is not favourable and could reflect badly on you. But you want to remain true to your values.

What's the guidance?

As an internal communication practitioner, part of our role, alongside other colleagues we work with, is to provide a moral compass to the organisations we work. That means standing up for what's right and sharing truths and not saying what you think they want to hear. It means developing confidence and skills to have those challenging conversations. But it is also about picking your battles and building trust with your stakeholders that will enable you to have those tricky conversations.

It wouldn't be right to ignore the feedback, but you'll need to consider what the best thing to do is dependent on the context. Sensitively gathering more feedback on the leader's communication style may help to inform this. You may be able to address the feedback directly with the leader without breaking confidence – approaching this as a coaching opportunity. Or, if the relationship with the leader doesn't allow for this, then a conversation with the relevant HR partner might help to ensure that the feedback is handled as part of ongoing performance management. You'll need to think about what's considered normal in your organisation in order to choose a course of action that is fair to both those providing the feedback and the leader themselves.

Protecting confidentiality

- The anonymity of those providing feedback should be protected.

- Agree confidentiality guidelines in advance of collating any feedback and make these transparent.

- The confidentiality statement (e.g. in a survey) should state that no individual incident can be acted on following the research and for individuals to use other available routes for this.

- If there is potential for disclosure this needs to be made explicit in advance. However, it will depend on what channel the information came through.

- If someone use an anonymous or confidential channel to raise an issue, they will have an expectation that their identify will be protected. In these cases, you'd need to have a very strong cause to break confidence - e.g. a very clear threat to the safety of that person or others around them, or a law being broken.

- If the person raises an issue with a manager or HR, the person they complain to may feel they have no alternative but to take action in cases involving abuse (for example). As always, this is often about context and interpretation rather than hard and fast rules.

- Where there is a conflict of ethical guidelines (e.g. between confidentiality and the disclosure of illegal activity/potential harm to others) then individuals must be informed in advance of any information being disclosed.

Embedding good ethical practice

Example

You have carried out an internal communications audit for a client. You are now presenting the results back to the HR Director. Some of the feedback is around employees being bullied and harassed, which is particularly concerning. The HR Director has expressed interest in this feedback has asked for further feedback and, in particular, the employee who provided the feedback.

What's the ethical dilemma?

Normal ethical practice is that such feedback should not be shared, as it has been given in confidence. Sometimes, particularly, if the internal comms practitioner is in a more junior role, it can be difficult to push back on such requests.

However, dilemmas around confidentiality arise when the principle of confidentiality is in possible conflict with other ethical principles such as avoiding harm to an individual or others. In specific circumstances possible harm to others will override the duty of confidentiality to an individual.

What's the guidance?

Audits are confidential and the feedback is shared in confidence. Maintaining confidentiality when feedback is collected remains vital to ensuring ongoing confidence of respondents/general population. The best approach in most cases is to flag the issue in a generalised way that ensures that individuals cannot be identified.

The identity of the individual should almost always be protected. This may limit what action can be taken against the individual in question, but more universal measures (e.g. putting a policy in place and making it accessible, management training) can still be implemented without compromising anyone's confidentiality. Only in cases where there is a genuine risk of harm to others would you consider breaking confidence. Before doing so, it would be wise for the IC professional to get a legal view (e.g. from the IoIC's legal helpline).

Being open, honest and transparent

- While legal requirements (e.g. for quoted companies) require some information to be held confidentially, this should be kept to an absolute minimum and set against the importance of establishing and maintaining trust with employees by being transparent about decisions affecting them.

- Employees should be informed about decisions affecting them at least as soon as other stakeholders (so e.g. simultaneously in the event of stock sensitive information).

1. All new IoIC members will be offered access to on-line training course - Ethical Guidance for Internal Communicators - as part of their joining package.

2. All IoIC members will be offered access to on-line training course - Ethical Guidance for Internal Communicators - every year as part of the renewal process.

3. An ongoing programme of Ethical Guidance workshops to be held throughout the year. Members invited to take part to discuss and reflect on current ethical issues and the appropriate response. Outputs from these workshops will be used to update the 'Guidance on ethical practice' to ensure we keep this up-to-date and a practical tool for our members.

4. Ethical practice will be incorporated into the IoIC profession map and be part of the CPD programme.

5. All IoIC qualifications will overtly reflect best ethical practice.

Further reading and information

1. The Institute of Business Ethics
2. Communicating Ethical Values Internally
3. CIPR – Ethics in Action for Internal Communicators
4. Ethics of the 'all staff' email
5. Ethical IC in a gas light world

Raising a concern

If you have a concern about a member of the Institute, please refer to our Code of Conduct for the process to be followed.