

Ethisphere

Essentials

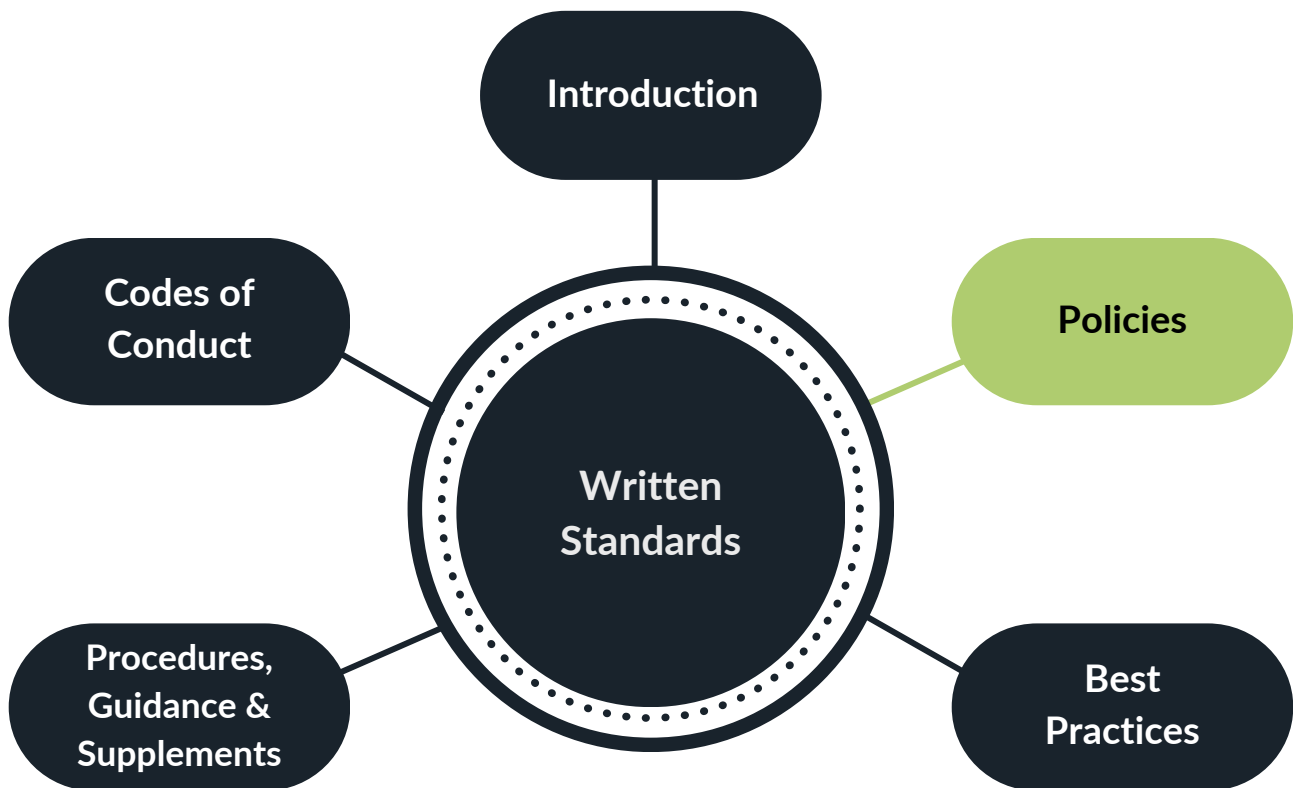
Written Standards

Part 3:
Policies

Guidance on *Policies*

This **Ethisphere Essentials** resource on Written Standards covers:

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GUIDANCE ON *Policies*

Written policies are a fundamental element of an effective compliance program and are essential for maintaining consistent standards and communications with employees. Policies outline an organization's position on the risk subject, incorporate relevant laws and regulations, company standards, and operating principles, and are brought to life through practical examples and real-world applications.

PURPOSE OF POLICIES

Policies outline the formal guidance for an organization's approach to specific topics and risk areas by providing an explanation of the subject and including practical examples to illustrate the application of the policy.

Policies vs. Commitment Statements

A **commitment statement** is a public-facing declaration about how an organization approaches or views a particular topic. They are aligned with the Code of Conduct and applicable policies and are a broad statement of agreement or intent.

Policies differ from commitment statements in that they lay out the actual guidance and rules for employees to follow.

It is not necessary to have both a commitment statement and a policy for all topics, but it is important to remember that having a commitment statement is not the same as having a policy.

Take human rights as an example. Many organizations publish a human rights statement on their commitment to upholding global standards. However, without a formal, written policy on how to recognize and maintain human rights at the organization, employees will likely not know what they should be doing, or how human rights violations may appear for them.

Developing a human rights policy that defines human rights and identifies the relevant obligations and requirements of the organization—along with remediation and consequences of non-compliance—can help employees understand what is expected of them and what to look out for.

DRAFTING A POLICY ON POLICIES

A strong Policy on Policies lays out the standards and guidelines for the structure, content (including readability and tone), development, approval, publication, maintenance, and management of an organization's policies. It ensures that policies are kept up to date, have a similar voice or tone, and are understandable and accessible for employees.

By developing and enforcing policy standards, an organization can ensure that key elements will be included in all policies, supporting overall policy management. Additionally, implementing a Policy on Policies gives employees a consistent expectation of where to find information and guidance.

What should be included?

While the content and scope of what should be included in a Policy on Policies will vary and should be tailored to the organization, a basic Policy on Policies should include:

- A standard policy template
- Guidance on drafting policies
- Roles and responsibilities for policy management
- Steps for developing a new policy
- Guidance on monitoring, reviewing, and updating policies

97%

of **2024 World's Most Ethical Companies** honorees have a policy on policies that governs how policies are created and updated, where they live, the standard template to follow, and more.

Policy Template & Drafting Tips

A Policy on Policies should include tips, advice, and guidance for those writing the policies. It should also include a policy template for drafters to follow to ensure uniformity of formatting and design. A policy implementation plan could also be included to provide a consistent workflow for the policy deployment team. See the section below on Guidance for Policy Drafters for tips and sample templates.

Roles & Responsibilities

This section of the Policy on Policies defines who does what. There could be a robust team of people managing policies at the organization, or it could be one individual, or anything in between. This will likely depend on the size and complexity of the organization and who owns organizational policy management. Alongside specifically designated individuals, there could be additional employees who review policy drafts, such as subject matter experts or a focus group.

Examples of Policy Management Roles could be:

- **Policy Owner** – the individual who drafts, revises, and maintains a particular policy.
- **Enterprise Policy Manager** – the individual who reviews all drafted policies to ensure that they meet the organization’s guidelines for readability and utilize the policy template correctly. They also usually manage the Policy Hub (where policies are stored and accessed by employees), communicate new policies or updates to policies to employees, coordinate with policy owners, and ensure that policies are monitored and reviewed.
- **Enterprise Policy Committee** – an organization may create a committee to oversee the management of policies. Members of the committee could include senior leadership, the Chief Ethics & Compliance Officer, the head of Human Resources, and representatives from corporate control functions and major business units.

Developing New Policies

This section should lay out the steps for developing a new policy at the organization. This should include:

- The process for proposing a new policy
- Steps for drafting the policy, including who to work with to ensure that the policy meets business needs and provides practical guidance
- Creating an implementation plan for the policy
- Guidelines for reviewing the policy
- The process for obtaining approval
- Implementing the policy and communicating it to employees

Monitoring, Reviewing & Updating Policies

The requirements for monitoring, reviewing, and updating policies should be risk-based and tailored to the organization. Use this section of the policy on policy to state timelines for monitoring and reviewing policies, including the cadence for review and circumstances that trigger an ad hoc update. If there are particular individuals who should be involved in the process, include their information in this section.

For example, the Policy on Policies may make a distinction between major and minor updates, detailing what constitutes each type, whether approvals are needed, and the steps for making revisions. That might look like this:

Minor revisions include changes such as correcting grammatical errors, fixing typos, and updating contact information. These revisions should not lead to a significant change in current practice or represent a cost to the organization. Minor revisions can often be made by the Policy Owner and do not need to be approved by the Enterprise Policy Committee if the organization has one.

Substantive revisions lead to changes in practice at the organization or incur a cost. If a policy needs substantive revisions, it is often put through the entire process for developing a new policy.

After any revisions are made, updated policies should be handed to the Enterprise Policy Manager to be posted to the organization's Policy Hub or applicable location and communicated to employees.



Sample Policy on Policies

Looking for an example? Request [BELA Member Guest Access](#)

GUIDANCE FOR POLICY DRAFTERS

Policies should be clear and easy for all employees to understand. Here are some tips and advice to follow when drafting policies:

- Follow the policy template, do not skip or remove sections
- In each section, use subheadings to break up the text by subtopics
- Use bulleted lists where appropriate
- Avoid long paragraphs
- Where possible, utilize visual ways to present information, such as tables, diagrams, or decision trees
- Use consistent terminology throughout the policy and across other policies
- Write as simply and clearly as possible
 - Employees may not be experts on the topic, so provide examples and definitions of key terms
 - Use plain language and common words and avoid overly technical descriptions
 - Spell out acronyms the first time they are used
- Focus on what employees should do, not what they shouldn't do. In other words, provide guidance to help them do the right thing
- Refer to the organization consistently throughout the policy
- Use “we” language when discussing shared responsibilities and values (“We all have a responsibility to protect company information.”), and use “you” language when providing actionable guidance (“You should contact your manager with questions.”)
- Use no more than 20% passive language and keep the reading level below grade 14 (a college sophomore) or whatever standard is relevant for the organization

SAMPLE POLICY TEMPLATE

Policy Title

The title should be short and meaningful so employees can clearly identify the policy's topic.

Table of Contents

If the policy is lengthy (more than five pages), consider adding a table of contents to make the policy easier to navigate. For shorter policies, this section can be omitted.

Purpose

A brief summary of why this policy is necessary and how complying with it supports the organization's business goals and ethical culture. Where possible, tie in a company value to provide the “why” behind the policy.

GUIDANCE ON *Policies*

Scope

State to whom the policy applies. Generally, global policies apply to all employees, as well as contractors, vendors, suppliers, or business partners. If the policy applies to a smaller group (for example, if it is not applicable to contract workers), this section should state that clearly.

Policy

Describe the requirements of the policy and the organization's expectations for employee behavior, including any exceptions or special situations. Where possible, break up the text with bulleted lists and subheadings. Define key terms and provide concrete examples or scenarios to illustrate the main concepts of the policy. Make sure to state the consequences of non-compliance with the policy.

Where to Go with Questions & Concerns

Provide contact information for relevant business units or functions, such as Human Resources or the Legal Department, along with the contact for any applicable individuals, such as the General Counsel or Chief Ethics & Compliance Officer. Include a mention of the Ethics Helpline and a statement of the organization's non-retaliation policy.

Related Policies & Procedures

List any policies and procedures about related topic areas that may be helpful to employees with links to guidance on the organization's policy hub.

Related Policies & Procedures

Policy Sponsor:	Type:
Contact:	Category:
Effective Date:	Policy Number:

Revision History

Update when any revisions, even minor, are made.

Date	Policy Revision No.	Revisions Made	Revised by:	Approved by:

SAMPLE POLICY IMPLEMENTATION PLAN

Policy Name:

Policy Sponsor or Owner:

Expected Policy Approval Date:

Who needs to be aware of the policy?

This may include all employees in certain business functions or employees in specific locations.

Potential Content for Communications

This section should outline what employees need to know about the policy and why it is important to the organization and their work. For example, is it a policy that provides new guidance? Does it reflect recent changes in the law or company practices? This will be used to guide the creation of communications.

Proposed Communication Plan

Communication Modality	Internal Resources Needed	Expected Communication Date	Department Responsible for the Communication
<p>This could include any of the following:</p> <ul style="list-style-type: none"> • Email • Video • Manager announcement • Poster, flier, or other hard copy material <p>[Company] is open to utilizing other communication modalities to reach employees, so feel free to suggest additional methods for communication.</p>	<p>This could be coordination or information from another function at the organization.</p>		<p>List the department that will be sending or disseminating the communication to employees.</p>
<p>Add a row for each modality or instance of communication.</p>			

Additional Information

Include any additional information about how the policy will be communicated to employees.

MODEL POLICIES

Check out these model policies on a variety of ethics and compliance programmatic areas. Some provisions in the policies may or may not apply to every organization based on size, industry, or region.



Want to unlock access to the other 7 sample policies?
Request [BELA Member Guest Access](#)

TO ETHISPHERE ESSENTIALS

WHAT ARE ETHISPHERE ESSENTIALS?

Ethisphere Essentials are exclusive Business Ethics Leadership Alliance (BELA) benefits that are foundational resource packages on topics that ethics and compliance teams must address on a continuing basis. While they can be used by programs at any maturity level, they are geared toward organizations that are looking to build the foundations of their ethics and compliance program.

This Ethisphere Essentials package is on **Written Standards**. It contains five resources:

- An introduction to written standards
 - The importance of written standards
 - A written standards framework
- Guidance on Codes of Conduct
 - The purpose of a Code of Conduct
 - Elements of an effective Code
 - Acknowledgement and training on the Code
 - Third-Party Codes of Conduct
- Guidance on policies
 - The purpose of policies
 - Drafting a policy on policies
 - Guidance for policy drafters
 - Policy Template
 - Policy Implementation Plan Template
 - 8 Model Policies
- Guidance on supplementary documents
 - Policies vs. Supplementary Documents
 - Examples of supplementary documents
- Best practices for written standards
 - Writing for your audience
 - Tips for accessibility
 - Measuring effectiveness
 - Educating employees



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Ethisphere Essentials on *Written Standards*

1

Introduction

- Importance of written standards
- Written standards framework

2

Codes of Conduct

- Purpose of a Code
- Elements of an effective Code
- Acknowledgement and training
- Third-Party Codes of Conduct

3

Policies

- Purpose of policies
- Policy on Policies
- Guidance for drafters
 - Policy Template
 - Implementation Plan Template
- 8 Model Policies

4

Procedures, Guidance, & Supplements

- Policies vs. Supplementary Documents
- Examples of supplementary documents

5

Best Practices

- Writing for your audience
- Accessibility
- Measuring effectiveness
- Educating employees