

# Compliance & Ethics *Professional*<sup>®</sup>

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A portrait of Ryan Meade, a middle-aged man with short, light-colored hair, wearing a dark suit jacket, a light blue dress shirt, and a patterned tie. He is smiling slightly and looking directly at the camera. The background is a blurred interior space with a wooden railing and some framed pictures or artwork on the wall.

## Meet Ryan Meade

Director, Center for Compliance Studies  
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# 11 tips for engaging middle managers on compliance

- » Middle management teams have close relationships with employees and significant oversight roles that make them key culture communicators that compliance professionals can often overlook or underutilize.
- » Ethics and compliance professionals need to make the case to leadership that middle managers play a cost-effective role in creating real culture change that can serve the business in a variety of ways.
- » The best way for Compliance to help support managers as culture and ethics ambassadors is by providing ready-made training, activities, and tools that managers can easily share with their team.
- » A direct call from Compliance lets managers know Compliance is an advocate when there is pressure to be non-compliant and reinforces the partnership between managers and compliance professionals in preventing abuse and unethical behavior in the organization.
- » Middle managers are the means by which compliance objectives and company culture change can actually happen, and they are a key resource that organizations can't afford to ignore.

**E**thics and compliance (E&C) professionals cannot create an ethical culture by themselves. They can only invite their employees to create that culture, and middle managers are a critical step in making this “ask.” The close relationship managers have with their employees makes them the real culture communicators in your organization.



Thomas

Moreover, managers play a significant role in many key systems of oversight. They review timecards, approve expense reports, hire new employees, and are often the first to receive reports of ethical violations. They are the first line of defense against most forms of misconduct within an organization.

Yet compliance professionals often underutilize these important team members. Tone at the top is

important; however, messaging from E&C and leadership can often ring hollow if not backed up by so called “mood in the middle.” Strong E&C messaging can even be seen as hypocritical and actively harm an organization when employees do not see that ethical culture reflected in their daily lives.

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Although it can seem daunting, there are several simple, concrete steps that compliance professionals can take to enlist the help of managers in creating an ethical culture.



Locklear

**Getting started: Making the case to leadership**

Engaging managers means an additional time investment in resources for a compliance program, not to mention the time busy managers will have to take away from their day-to-day work to be trained on and implement compliance activities. Before compliance professionals can unlock the potential of their managers, they will need to secure buy-in from leadership. Pulling managers away from their primary role will never be an easy “ask.” However, middle managers provide a cost-effective opportunity to create real culture change, which can serve the business in a variety of ways. Furthermore, involving managers in the process sooner rather than later will help with employee engagement and retention and provide development opportunities for these resources. Training these individuals could also create a pipeline of talent that could be used to fill other managerial or compliance-related roles.

When making the case to leadership, outline the financial benefits of an ethical culture. Ethical organizations enjoy fewer legal costs, lower employee turnover, and more satisfied customers. Middle managers can also be a powerful tool for breaking down departmental silos and ensuring compliance messaging is disseminated throughout an organization. In addition to outlining the benefits, make sure you outline management-specific risks in your risk assessment. This includes the roles managers play in financial oversight, hiring,

confidential information, employee reports, retaliation risks, etc.

You will rarely be given all the resources you need. So, start with changes that provide the most benefit with the least commitment from your employees and managers. Usually, this means starting with an organizational culture assessment. This assessment measures employee perceptions

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of an organization’s program and culture. Assessment findings can often highlight problem areas and help you gain traction internally for spending more time and resources on compliance needs. An assessment can also help you pinpoint what areas you particularly need to focus on in the immediate future and

assist in exploring whether the “tone at the top” is understood and accepted by managers and employees on the front lines.

**1. Provide ready-made training and activities for managers**

You will undoubtedly have many requests and initiatives you ask managers to undertake in their role as culture and ethics ambassadors to their teams. However, Compliance can avoid being just another department making demands of managers. Instead, E&C professionals can position themselves as partners by providing tools and ideas that help make managers’ jobs easier and their teams stronger. Turnkey training and activities are one way you can contribute to any E&C efforts you want managers to undertake. Usually, these are

short, discussion-based scenarios managers can talk through with their teams to help reinforce E&C messages. You can also provide managers with talking points to share with their teams via newsletters, group Q&A sessions, or one-on-one meetings. These tools allow E&C managers to utilize a train-the-trainer model that ensures consistent messaging across the organization and allows a small E&C team to have a large impact without an exorbitant travel budget or countless hours spent training.

## 2. Provide tools that make their job easier

Ensure managers have the tools to make their day-to-day work as E&C ambassadors that much easier. Provide a checklist of what to do when an employee reports an ethics violation. This makes the process easier for them and ensures managers follow all appropriate steps when caring for an employee's concern. Provide a simple and intuitive method for managers to submit employee concerns. Considering that 35% of ethics violations are reported to a manager first, this can be a powerful tool in collecting the information you need.<sup>1</sup> E&C teams can also provide sample interview questions and scoring rubrics that help managers hire for integrity.

Clearly laying out expectations and backing them up with tools and materials to make life easier demonstrates a strong commitment from E&C and the executive team. Consider what managers need and how you can improve their day-to-day work. This will position Compliance as a strategic

partner and make managers more willing to help with E&C requests in the future.

## 3. Reinforce messaging to managers throughout the year

Once you have trained managers in an E&C initiative, reinforce this and continue to engage those managers throughout the year to keep momentum going. This demonstrates that E&C is an ongoing effort, not something to simply pay attention to once in a while or

when an issue arises. Staying in touch with managers can be tricky, but being creative about how and when to reach them can help. If you have the resources, an E&C newsletter for managers might be perfect for sharing Q&A, conversation starters with employees, or the latest on an industry regulation change.

It can also offer tips on E&C webinars they might want to attend and other relevant E&C information or initiatives the organization is participating in. Look for articles that provide practical guidance you can share to help managers deal with the day-to-day challenges of leading a team ethically.

Consider providing an intranet portal or social media page exclusively for managers. This can provide a space for collaboration and a confidential outlet for managers to share and learn from each other under the guidance of the E&C team.

If you cannot take on all these initiatives yourself, consider using preexisting methods for reaching managers. If a newsletter is already in circulation, ask for space for E&C

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topics. If you already have a web or intranet page for managers, perhaps you could add a monthly E&C topic.

#### **4. Advocate to include ethics and compliance topics in new manager training**

Many companies offer new manager training, ensuring that new hires as well as current employees moving into management roles live up to the expectations of the organization. Manager onboarding allows organizations to set the tone for managers right from the beginning. Compliance teams should take advantage of any set manager training time and ask to be included in this process. Supplement this training with an onboarding kit that contains links, documentation, and resources that can help managers in their role as culture ambassadors.

New managers are attentive and impressionable, and this is a perfect time to help them understand their role as a culture and ethics ambassador, as well as get them familiar with the E&C team. Setting the tone with new managers from the start can pave the way for a partnership moving forward.

#### **5. Provide messaging from other managers**

Although messaging from executive leadership and the Compliance department is important, allowing fellow managers to deliver messaging can make a stronger, more lasting impression. Fellow managers can make the case that being ethical and compliant applies to them and that they have

role models and resources in other managers. Include current managers in new manager training or have them walk other managers through “real world” scenarios and discuss relevant topics. You can even provide real-life examples from your own organization, as long as that information is confidential and anonymous.

#### **6. Have managers create their own messaging**

Consider having managers create their own compliance messaging based on material or talking points you provide. Give them ready-made talking points, but encourage them to tailor these to their team’s unique situation and needs. Creating their own content allows managers to craft messages that they believe in and will share with their teams with genuine enthusiasm. Furthermore, managers typically understand

employee lingo more so than others, so letting them craft their own messaging in a way that makes sense to their employees is critical to their success and being trusted as a leader versus being considered just another voice from corporate.

#### **7. Advocate for managers when there is pressure to be non-compliant**

When pressure to meet unrealistic or poorly created goals is not checked by effective systems of oversight, managers may be tempted to cut corners. Rather than giving in to this pressure, managers can play a key role in preventing abuse and unethical behavior

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in these situations. Let managers know you will be an advocate and partner to them when there are pressures in the business to act unethically. Let them know they can come to you if they believe or see that pressure in the organization. This will help diffuse potentially disastrous situations and reinforce E&C's role as a strategic partner to managers.

### **8. Create feedback channels for managers**

Change is almost always difficult. Asking managers to be E&C communicators means asking even more of an already overworked segment of your workforce. However, proactively asking managers to provide input on E&C matters can encourage buy-in and reinforce that Compliance is a partner. Closed door sessions, survey questions, or intranet portals that allow managers to provide feedback will provide valuable insight and ensure that managers are more receptive to the changes and new initiatives that result. Consider having members of the E&C team call managers once a quarter to ask how things are going and how the E&C team can help. This will provide valuable feedback to your team and reinforce that Compliance is there to help. Chances are you will be the only team proactively reaching out to make manager's lives easier.

### **9. Help create/drive messaging from leadership to middle managers**

Petition leadership to create messaging just for managers. If they are already doing this, encourage them to include compliance topics. This can reinforce your message and show

that managers have the support of leadership. If the CEO or other leaders can join a webinar or training for managers, even better. Again, it is important to have messaging to managers be consistent regardless of who it comes from. This consistency and alignment on messaging demonstrates that the organization is not just paying lip service to compliance efforts.

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### **10. Outline clear expectations around reporting**

Managers often make up the front line in any open door policy a company may have. Compliance teams need to ensure managers know exactly what to do if an employee brings a concern forward

to them and, most importantly, how to spot potential issues based on conversations with employees. Ensuring managers feel equipped and confident to take reports can be vital to employees feeling confident that their report will be cared for in an organized, confidential manner and increase the likelihood they will report to the manager again if needed. Coaching, training, and education for managers is key, along with providing them tools to effectively take the report. Ensuring there is a clear process for submitting a report goes a long way in supporting managers and creating a consistent process for reporting across the organization.

### **11. Utilize preexisting materials**

Maintaining regular messaging and communication with managers, especially if you have thousands of employees, can be time consuming and difficult. Compliance

teams often have a lot on their plate, even without the added responsibility of constantly creating new, impactful content for managers. Save time by leveraging resources that you can send to managers with little-to-no modification. Leverage industry websites and blogs for information, statistics, and case studies that you can send to managers. Share anonymized incident management case metrics that you are already reporting to leadership. Providing this team with insight into case volume, anonymity rates, and other data will make them feel as if they are part of the process.

**Conclusion**

Compliance resources are often spread thin in an organization. There will always be more risks than there are staff and resources to address them. In this

context, it would be easy to see engaging middle managers as just another To Do on a long list, something that would be great if only compliance teams could get around to it. However, managers are not just another compliance objective. They are the means by which compliance teams can achieve their objectives. Because of their close proximity to employees and the relationship they have with their teams, they are a key resource that compliance teams cannot afford to ignore. \*

1. Ethics Resource Center: National Business Ethics Survey of the U.S. Workforce, 2014. Available at <http://bit.ly/ethics-survey>

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