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by Walter E. Johnson, CCEP, CCEP-I

Ethical leadership: Mentoring to influence corporate culture

- » Mentoring programs provide another communication channel for influencing ethical culture.
- » Ethics and compliance officers (ECOs) may notice similarities between the elements of a mentoring program and an effective compliance program.
- » Formal and informal mentoring programs can influence ethical behavior.
- » Individuals can ask themselves several questions before selecting a mentor.
- » A five-step process can be useful for influencing ethical behavior.

Leadership quotes, diagrams, statistics, images/memes, and other resources fill the screens of popular social media sites. An individual doesn't have to conduct extensive research for leadership perspectives. With leadership resources readily available,

there continues to be a consensus that there is an ongoing ethical crisis and a need for leadership.¹

Are leaders born or trained?

This question has been evaluated extensively by the late "leadership guru" and author Warren Bennis² and other thought leaders. Lynda S.

Hilliard visits the topic in a 2016 issue of *Compliance Today*.³ If one was to ask whether ethical leaders are born or trained, my guess is that there would be less of a debate and most would vote that ethical leaders are trained.

Globally, organizations are on a continuous quest to deliver quality products and services while being more productive and achieving cost efficiency. Many of these organizations are making a conscious effort to achieve these results ethically. At the foundation, each result is driven by effective

workforce engagement. Ethics and compliance officers (ECOs) are continually developing approaches to engage the workforce. The board or governing body has a responsibility to help foster an ethical and compliant culture.⁴ Because many ECOs are included in the C-suite strategy sessions, one approach worth proposing is to establish a mentoring program to increase workforce engagement. Mentoring programs are commonly known for succession planning, but mentoring can be a tool for influencing corporate culture through leadership development at all levels. According to Salmon Byrne, there is an increasing awareness that succession planning must extend beyond just the CEO role.⁵

Corporate culture is set by the leadership tone, but there is often an inconsistent subculture within the operational front line. There are many reasons for this inconsistency, but here are a couple. One reason is middle management and front-line supervisors may misinterpret leadership actions and tone. Another reason is that individual employee philosophies of business practices may differ from



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leadership. Training is an approach to resolving inconsistency by engaging employees continually throughout the year. As this one channel remains the go-to solution, many companies are seeking assistance to provide training using multiple approaches such as gamification, videos, and cartoons.

Mentoring requires continual engagement between the mentor and mentee. This approach offers another channel for interaction besides delegation of duties and training. Due to its structure, it provides the opportunity for an informational and often inspirational exchange among participants. This relationship can influence change in behavior.

Formal mentoring

Many federal government agencies offer formal mentoring programs. The United States Office of Personnel Management (OPM) has evaluated each of their agencies mentoring programs and recorded their findings in the “Best Practices: Mentoring” publication.⁶

For organizations that decide to develop a formal mentoring program, OPM recommends including these five elements:

- ▶ Conduct Needs Assessment
- ▶ Develop a Mentoring Program Roadmap
- ▶ Gain Top Management Support and Commitment
- ▶ Commit a Program Manager
- ▶ Create a Steering Committee or Working Group

ECOs should find these elements similar to the guidelines established by the United States Sentencing Commission that highlight the elements of an

effective compliance and ethics program. In comparison, a formal mentoring program requires similar support from senior management to accomplish program objectives.

OPM recommends the following components to implement a mentoring program that is consistent with the best practices of federal agencies.

1. Develop a Recruitment and Marketing Strategy
2. Match Mentors and Protégés
3. Conduct an Orientation Program
4. Develop an Instruction Guide for Mentors and Protégés
5. Develop an Instruction Guides for Supervisors
6. Conduct a Pilot
7. Develop a Mentoring Agreement
8. Develop a Mentoring Action Plan
9. Provide a List of Topics to Discuss
10. Provide Developmental Activities
11. Conduct an Evaluation
12. Conduct an End-of-Program Graduation/Recognition Ceremony

Formal mentoring programs offer many benefits to the mentor and the mentee. According to OPM’s research, there are the benefits to both.

Benefits of mentoring for the mentor

- ▶ Renews their enthusiasm for the role of expert;
- ▶ Obtains a greater understanding of the barriers experienced at lower levels of the organization;
- ▶ Enhances skills in coaching, counseling, listening, and modeling;
- ▶ Develops and practices a more personal style of leadership;
- ▶ Demonstrates expertise and shares knowledge, and;
- ▶ Increases generational awareness.

Benefits of mentoring for the protégé

- ▶ Makes a smoother transition into the workforce;
- ▶ Furthers his/her development as a professional;
- ▶ Gains the capacity to translate values and strategies into productive actions;
- ▶ Complements ongoing formal study and/or training and development activities;
- ▶ Gains some career development opportunities;
- ▶ Develops new and/or different perspectives;
- ▶ Gets assistance with ideas;
- ▶ Demonstrates strengths and explores potential; and
- ▶ Increases career networks and receives greater agency exposure.

The benefits from both perspectives have the potential to influence culture. For example, a mentor who has a greater understanding of the barriers experienced at lower levels of the organization can share this information at management meetings. Additionally, the mentor can use this information to identify opportunities to coach, counsel, listen, and model behavior on a broader scale.⁷ For the mentee/protégé, they can correct behavior by observing modeled behavior. They can expand their personal development by learning new information to translate values and strategies into productive actions.

Informal mentoring

Many organizations may decide not to establish a formal mentoring program

Many organizations may decide not to establish a formal mentoring program after receiving a presentation that outlines the benefits, costs, and challenges.

after receiving a presentation that outlines the benefits, costs, and challenges. Some organizations may decide not to establish a formal mentoring program, because they have insufficient resources. Often, organizations support informal mentoring programs by encouraging leaders to have offsite team-building activities with guest speakers, providing resource materials

such as personal development books, and designating areas within the facility for mentor-mentee interaction.

Employees may be aware of informal mentoring activities, because they are publicized within the organization. When it is not publicized, the awareness may be generated

by the subculture, which can lead to misinterpretation or false messaging. A couple of principles are used in informal mentoring.

The first is the Pareto Principle, which is commonly referred to as the 80/20 Rule.⁸ This principle is named after Vilfredo Pareto, who learned that 80% of the land in Italy was owned by 20% of the population. After conducting further research, he learned that this distribution occurred frequently in other areas. The 80/20 Rule is referenced in sales and leadership presentations, articles, and books. The most common references are 20% of an organization's customers generate 80% of the revenue, and 20% of the organization's staff produces 80% of the products and services. Based on this principle, many informal mentoring programs recommend that senior

management focus 80% of their attention, support, and resources to the top 20% of employees.

This strategy has merit, and I believe organizations that apply this principle may have different results. I believe organizations that apply a pyramid method to the 80/20 principle will achieve better results than the organizations that do not cascade the principle throughout the organization. If information and resources remain within the top 20%, organizations can expect a disconnect in the culture and possible ethics violations.

Another principle is the Law of 33%. In 2015, Tai Lopez shared his philosophy of mentoring at TEDx.⁹ According to the Law of 33%, individuals should distribute mentoring activities into segments by 33%. The first 33% are being mentored by an individual who has accomplished 10 times the amount the mentees are attempting to accomplish. The next 33% are exchanging ideas and concepts with peers that are on the same level. The final 33% are mentoring individuals who have not achieved the mentor's level of accomplishment. The application of this law has the potential to influence culture. It is structured so that regardless of status, there is an opportunity to obtain guidance from a mentor. Some organizations assign a senior-level executive and a peer to mentor new employees. This may be short-term for some organizations and long-term for others.

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Informal mentoring doesn't have the level of data that is consistent with formal mentoring programs. The data for informal mentoring is presented in the form of testimonials. In an interview, Kristy Grant-Hart made this statement about her mentor Lisa Beth Lentini, "She taught me

brilliantly."¹⁰ Months ago, I attended the retirement ceremony of Chief Warrant Officer Five David Williams. The ceremony was held at the Pentagon in Washington DC. In his retirement speech, CWO5 Williams says, "Throughout my career, I have had many mentors. Everything that I have learned, I tried to pass down to

those that came after me. As I leave today, I hope that mentoring others is the legacy that I leave behind." Informal mentoring has an ability to influence that is similar to formal mentoring.

With the level of research that supports the benefits of mentoring, one would think that more organizations would consider having a mentoring program. One must consider that organizational size and resources vary. What's an incredible incentive for one can be devastation for another.¹¹ Each organization must determine whether implementation is appropriate and, if so, when is the appropriate timing. Another factor is that individuals have different visions for their own future, so their temperament, desire, ambition, and goal-setting differ.

What am I becoming here?

Many employees want to know what they are obtaining from an organization. Perhaps, the correct question is, "What am I becoming here?" Organizations have positive and negative influences that may impact the ethical culture. Ethical employees recognize that who and where they are remain their responsibility.¹² If an organization is not offering the tools or their supervisor is not supporting access to the tools to improve ethical behavior, employees can take action to become better by finding a mentor or becoming a mentor.

There are employees seeking mentors inside and/or outside of the organization. For employees who have identified a potential mentor, John Maxwell recommends addressing these questions before contacting the potential mentor:

1. Does my potential mentor's life deserve a following?
2. Does my potential mentor's life have a following?
3. What is the main strength that influences others to follow my potential mentor?
4. Does my potential mentor produce other leaders?
5. Is my potential mentor's strength reproducible in my life?
6. If my potential mentor's strength is reproducible in my life, what steps must I take to develop and demonstrate that strength?

ECOs should be aware that employees are seeking to model behavior. The challenge for ECOs, as well as management, is to become the model for behavior before undesirable behavior influences employees in an unethical direction. For ECOs seeking to influence change through one-on-one interactions, John Maxwell recommends this 5-step process:

1. **Model** the behavior by demonstrating the process to the individual.
2. **Mentor** the individual by being available to answer questions as they go through the process.
3. **Monitor** the individual as they complete the process independently.
4. **Motivate** the individual by cheering their success.
5. **Multiply** by sharing this concept with the individual to teach others.

Conclusion

Mentoring programs may offer another approach to influencing an ethical culture. There are formal and informal program structures for organizations to consider. For individuals who are employed by organizations that do not have a mentoring program, there are alternatives for consideration. Through ongoing commitment, developing an ethical culture is possible, either formally or informally, one employee at a time.

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