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I will admit the term “wandering around” may not relate to what most of us agree to be productive workplace habits. Even Webster’s primary definition for “wander” is to move about without a fixed course, aim, or goal. So, I get it. I understand the inherent need for the compliance-minded business professional to scoff at the thought of aimless wandering. However, what if wandering around is exactly what your compliance program needs to bring it to the next level?

For those familiar with the management philosophy of management by wandering around (MBWA), you may guess where this article is going. For those unfamiliar with this concept, and as a refresher for the others, let us first recall the core concepts of this popular method.

Management by wandering around (MBWA) means managers are putting aside emails, meetings, and spreadsheets to get out of their offices and engage employees by talking with them, asking questions, and listening.

Bill Hewlett and David Packard used such an approach in their open management style at Hewlett Packard (HP). Tom Peters and Robert Waterman later highlighted “The HP Way” in their best-selling management book, *In Search of Excellence: Lessons from America’s Best-Run Companies* (1982). It was here Peters and Waterman coined the MBWA term. The premise was simple—for managers to have their finger on the pulse of their organizations, they needed to wander around and talk to their employees.

The HP executives learned information received through formal
channels was filtered and diluted once it reached them. Telling the boss what they wanted to hear, and minimizing and leaving out details were an unfortunate fact of chain of command. Therefore, managers were not getting a full picture of the problems employees and their organization faced. However, by wandering around, talking to employees, asking questions, and listening, they had a better understanding of their concerns and were better able to fix them.

**Compliance by wandering around (CBWA)**

Compliance by wandering around (CBWA) may seem like an obvious attempt at a spin-off of the aforementioned philosophy, and it is just that! Because when aligning these core principles to the challenges we face as compliance professionals, CBWA makes good sense!

Employees often view the compliance office or officer as cold, unapproachable, and even scary. At the least, they may view the function as dry, boring, and a likely impediment as opposed to a partner. Although I understand (but disagree with) the dry and boring perception, we know the rest is untrue, and such assumptions are harmful to our programs. However, if we wait for folks to approach us to learn these are not the case, we will wait a long time. In addition, our compliance programs will suffer for it. CBWA helps us to fix this problem!

Peters later penned another book, *A Passion for Excellence*, in which he further argued the MBWA philosophy as a core component of successful leadership. In this book, Peters outlined three primary components required for a successful MBWA strategy. When managers use MBWA, they needed to:

1. Listen to people.
2. Use these discussions as an opportunity to communicate the company’s values.
3. Be ready to provide on-the-spot assistance.

Now let us translate these three concepts to CBWA and the role of the compliance officer/professional.

**Listening**

We think we are great listeners, and I am sure many reading this are. However, I will posit a guess that most of us can improve in this important area.

The more we are out from behind our desks, engaging, understanding, and listening, the more trust we build and the more opportunities we create for employees to report concerns. In addition, the more we understand these employees and their roles, the better we can understand their concerns and assist them.

Have you ever given a presentation and afterwards an employee pulled you aside, wanting to discuss a compliance concern with you? I know I have, and by practicing CBWA, we create even more opportunities for such interactions.

As compliance professionals, we need open and honest communication with employees. For this to happen, we must be accessible and able to listen.

**Emphasizing the company’s values**

We can memorize the organization’s values, include them in our codes of conduct, and add them to our email signature blocks. However, our experience tells us: Employees do not turn to written statements for cues about how to behave—they look to one another. This truism applies to all employees from top to bottom. Employees and managers will behave the way they see others behaving.

Therefore, stating values is important, but emphasizing the values through our actions is how we get the greatest lift. I can think of no better way to demonstrate these values than by leveraging CBWA. Employees will not trust that we are exhibiting the values until they see it, and CBWA creates opportunities for employees to have conversations and witness our values in action. When employees realize our values comport with their own, this increases the likelihood they will bring issues forward.

Compliance professionals should incorporate the organizational values into the compliance message at every opportunity, and this message is most powerful when delivered in person!
Providing assistance
Learning the areas of the organization and witnessing the problems employees are experiencing are key for providing help. Waiting for these issues to bubble up to the compliance office may never happen, and allowing them to fester results in decreased morale and exacerbated problems.

Genchi Genbutsu, or “go and see,” is a management philosophy embraced by Toyota. Rather than learning of concerns and then making edicts from the boardroom, Genchi Genbutsu requires one to experience the problem firsthand and only then make suggestions for improvement. Quality management guru W. Edwards Deming also said, “If you wait for people to come to you, you’ll only get small problems. You must go and find them. The big problems are where people don’t realize they have one in the first place.”

Being on-site and willing to assist gives employees a stronger appreciation for our role, and they will be that much more apt to reach out. We may hold the solutions to fix their problems then, or we may need to get back to them later. Either way, the on-the-ground support helps build trust and relationships.

Conclusion
I have always said the most important skill of the compliance professional is being able to articulate the value proposition for compliance: helping others understand why compliance is important to their success and that of the organization. As compliance professionals, we get this. We know where compliance fits into the success puzzle. However, most do not, and it is up to us to educate them.

What is in it for me? Why does compliance matter? What are the consequences of noncompliance? How will this affect my role or the institution? Employees need answers to these questions, and CBWA creates these opportunities! If they do not understand what is in it for them and why compliance is important, they will not buy in. Without this buy-in, even the most competent and passionate compliance program will realize limited success.

So go ahead. Get out there and wander around!

Endnotes

◆ Relationships are key to successful compliance programs.
◆ Some compliance concerns will make their way to your desk, but many will not. As compliance professionals, we must also go out and find them.
◆ Meeting directly with employees and understanding their roles helps us to better understand and/or identify compliance concerns.
◆ In order to buy in to compliance programs, employees need to understand how compliance ties in to their own goals and objectives.
◆ No one can better articulate the value proposition for compliance than you can, but you need to go to the employees.