

## The Accidental Compliance Professional Lesson 8. Get into the Soul of the Machine

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Early on in my career, a compliance officer at a Fortune 100 company asked me to come give a presentation on “Compliance as a Verb.”

“I would love to do it, but I have no idea what ‘Compliance as a Verb’ means,” I told her. I was honored—I had never received a call from a Fortune *anything* company to come speak. However, I had no idea what she meant.

She explained, “I was talking to your outside counsel. She says you do compliance by walking around and talking to people, rather than just going to meetings all the time.” I went from clueless to I got this, instantly.

“I love this subject. I am in,” I said.

At the presentation, I basically told the folks in the audience to stop going to meetings, creating spreadsheets, and agonizing over what colors to put in their PowerPoint presentations. I told them to get out and talk with the people who make the mistakes you want to prevent. Get out and talk to people about the kind of culture they want their organization to have. I said they should try to effect change rather than plan to effect change.

I have been preaching this strategy for 23 years and the reaction is always very positive, but then people go back to their office to work on spreadsheets and PowerPoint presentations for their next meeting. I have made a difference in the effectiveness and productivity of others in my career, but at the same time I feel like an absolute failure because people can’t seem to follow this advice. This has been one of the most frustrating elements of having to manage people. They want to be productive, but they can’t seem to tell the difference between planning to do something and doing something.

### **Spend Time with People ( *Not* Spreadsheets )**

Maybe I came to my people-first approach because I hate meetings so much. I believe meetings have a low return on your investment of a compliance professional’s time and money. I think the same about spreadsheets, PowerPoint presentations, and other forms of analysis paralysis. I believe most compliance problems are caused by people. So why do we spend so much time in meetings talking to people who already get it and at computers typing stuff few people will ever read?

Part of the reason why the compliance profession was created and why many have failed at it is because leadership and compliance were not spending enough time with the people causing the problems. More importantly, leadership and compliance were not spending enough time with the people who knew where the problems were. When I was a compliance professional we had a hotline that worked like many other hotlines . . . not much at all. Some people would call in to tell us they didn’t get a promotion, someone touched their desk, or their supervisor wouldn’t let them buy some very expensive piece of equipment. However, we got little to nothing regarding compliance issues. So, instead, I walked the halls. I would walk up to anyone and say something like, “How about them Yankees? Great weather we’re having, eh? By the way, are you aware of any known problems that have yet to be resolved?”

One day, I asked someone who worked for me that question, and I’m so glad I did. I had not been there long and so I was not completely aware of all that had happened before I came, and my employees had not come running

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up to me with their list of problems yet. In fact, I am not sure they really understood how different things were going to be now that we had a compliance program. I asked the question and this very good employee shared with me a big, unresolved issue as casually as the day was long. She and her colleagues had found the problem a few years prior, reported it, and then leadership told them to let it go. She accepted the rejection and forgot about the issue . . . *until* I asked. Without that conversation, the problem could have persisted, possibly resulting in huge fines for the company. Although it took a while, we eventually fixed the problem. All I did was ask a simple question—of someone in the compliance department, no less!

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