

## ethikos Volume 32, Number 3. May 01, 2018 A culture of integrity

By Mary Shirley

Mary Shirley (<u>mary.shirley@fmc-na.com</u>) is Senior Director, Ethics & Compliance for Fresenius Medical Care North America in Waltham, MA.

There is general consensus that companies with compliance programs strive for a culture of integrity. What does that look like? An environment in which people conduct business tasks in a way that is morally and ethically sound. They don't subscribe to a "win at all costs" philosophy. They make decisions because they're the right thing to do, not necessarily because they'll enrich the employee. Despite the fact we tend to agree that having a culture of integrity is a positive attribute, actually cultivating that culture can be more difficult.

## A good communications plan is not enough

If I ask peers what they're doing in their companies to foster a culture of integrity, a very common response is "Oh, we hold a Compliance fair every year. It's really popular." Don't get me wrong; a Compliance fair or other event of compliance outreach is fantastic. The thing is, an event is more suited to being a part of a compliance communications plan, an act of outreach and advocacy to better promote the Compliance department's approachability. Having an event just generally makes us seem more fun and human while we sneak in a bit of education and awareness. Think about it: When was the last time you held a Compliance fair and a business leader gave feedback along the lines of, "Now that I completed some compliance trivia and word games this week, I'm really feeling like the DNA of how our company does business has changed for the better."

Even if you've got the CEO or chairperson to open the event with a speech (that's great tone at the top), more than that is required to push for a culture of integrity. A once-a-year drip is not going to make for a company awash with compliance mindfulness. Culture development or change needs continued effort and reinforcement that gets colleagues deeply thinking about ethics on a regular basis and makes sure that compliance considerations are inherently part of all business decisions. From there the practice evolves into walking the walk and talking the talk of compliance without thinking — that's when a culture of integrity has truly become part of your DNA.

So how do we proactively ensure that we are working for companies that demonstrate commitment to molding a culture of integrity? The possibilities are as limitless as your imagination. Some key things to keep in mind when considering what initiatives will work best for your company are:

- Enforcing patterns of behavior
- Inspiring conscious thought about compliance, not just in executives, but all throughout the business
- Widespread reach and visibility
- Incentivizing rather than threatening (you'll get a culture of compliance with the latter, but that won't help to inspire integrity)

## This document is only available to subscribers. Please log in or purchase access.

Copyright © 2024 by Society of Corporate Compliance and Ethics (SCCE) & Health Care Compliance Association (HCCA). No claim to original US Government works. All rights reserved. Usage is governed under this website's <u>Terms of Use</u>.

Purchase Login

Copyright © 2024 by Society of Corporate Compliance and Ethics (SCCE) & Health Care Compliance Association (HCCA). No claim to original US Government works. All rights reserved. Usage is governed under this website's <u>Terms of Use</u>.