

Ethikos Volume 36, Number 3. July 02, 2022 Building better culture and compliance with trust

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Effective compliance and ethics programs have become goals of companies and organizations worldwide. Reaching this objective is possible, but it cannot be achieved without a culture built on trust. Building it does not come from “one and done” webinars or trainings. It comes from doing the work—actively, consciously, and continuously. “Success at its core *always* comes as a benefit of being trusted.”^[1] It’s easy to place blame for an ineffective program on issues related to leadership, communication, or resources, rather than looking at low-trust culture. Trust is the fundamental building block for success. High-trust culture leads to organizational success on many fronts, including compliance and ethics.

A few years ago, attorney Thomas Fox offered this observation: “It all starts with trust, but once you achieve trust, you can move forward to affect the change you need to generate to achieve an effective compliance program going forward.”^[2] Without trust, implementation and maintenance of an effective program may be only a strategic idea without ability for execution.

DOJ expectations

The U.S. Department of Justice (DOJ) has made it clear that check-the-box programs fall short of actually being effective. Debate continues over the age-old question of how to get to this expected finish line. Spend more money on more training programs? Survey and test employees annually? Draft more policies and procedures? These and other options may not meet government expectations to demonstrate effective programs.

Although coming from a prosecution perspective, the DOJ document has been a guiding light for all compliance and ethics programs. Three fundamental questions create the foundation in this guidance for reviewing compliance programs. To be effective, they need to be well designed, applied earnestly and in good faith, and work in practice.^[3] Measurements and metrics are essential to provide these answers, to determine effectiveness as well as improvement. For example, evaluating the impact of programs on employee behavior or operations is specifically discussed in this guidance. How are you evaluating and measuring the level of trust in your organization? Building trust between employees and leaders is a critical program element to establishing a high-trust culture where innovation, productivity, profitability, loyalty, and—yes—even compliance and ethics thrive.

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