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### A strong culture isn't enough to prevent misconduct

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By Dian Zhang

Most compliance leaders are missing out on an important way to understand how well their programs work, leaving their organizations with a blind spot about the strength of its defenses against misconduct, all while regulatory scrutiny intensifies.

#### The limitations of culture

Compliance executives have concentrated on building an ethical culture and assessing its robustness through surveys and focus groups. This is important, especially when employees flout policies because they rationalize their behavior (“It’s not wrong in this instance”) or they are flat-out malicious (“This is wrong, but I want to do it anyway”). Knowing their colleagues place high value on integrity can make people less likely to behave badly on purpose.

But employees in fact face a different problem more frequently: uncertainty (“I don’t know how to comply”). Almost nine in 10 employees (87%) said they felt uncertain about their ability to fulfill compliance obligations at least once in the past 12 months, compared to rationalization (77%) and malice or intentional misconduct (40%), according to our survey of 1,012 employees.<sup>1</sup> When uncertainty reigns, people may still fail even if they want to do the right thing.

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