TO:       William & Mary Managers

FROM: Kiersten Boyce, Chief Compliance Officer

RE:       Creating a Culture of Compliance & Ethics: Your Critical Role

Employees take their cues from you. If something is a priority to you, it’s a priority to them. As their leader, employees look at your attitudes and actions to answer the questions, “What’s really important around here?” and “How do we really do things at William & Mary?” The way the workforce thinks, behaves and works is the very definition of workplace culture. And your behavior is a key factor in shaping the culture.

Intentionally building a culture that has a reputation for ethics and integrity is hugely important for many reasons. Ethical organizations succeed due to higher productivity, more loyalty, the ability to attract and keep the best employees, and increased trust and improved collaboration.

What You Can Do to Create the Right Tone

While ethical culture-building may feel like an enormous responsibility, it is a natural outcome of good management. It is also a primary goal of an effective compliance and ethics program, in which you already play a part. There are several things you can do to set the right tone and actively support William & Mary’s compliance and ethics program:

- Manage trust: This means addressing wrongdoing appropriately and with consistency. Protect confidential information and avoid favoritism. Keep your promises; tell the truth; be respectful. Cooperate fully with investigations. All these behaviors build trust in you and in the system. Employees view the university’s commitment to integrity through the lens of how they are treated. Your trustworthiness tells employees if that commitment is real or not.

- Respond to problems: Asking questions and raising concerns is an important compliance activity. As a supervisor, employees turn to you with workplace questions and issues. Your key responsibilities in this role include being available to employees and listening objectively to their issues. Equally important is your duty to handle issues properly and promptly. Never forget to close the loop with the person who raised the concern. Your
approach has the power to encourage employees to come to you with important issues or shut down the process. The Memo to Managers on retaliation provides further guidance on this important topic.

- **Play a role in education**: When it comes to compliance training, what is your attitude? You can support the initiative by explaining to staff why it is important and take the training yourself. Periodically, bring in a news clipping or pick a compliance topic to discuss in a group meeting that is relevant to the risks the employees face. Model the use of William & Mary’s Code of Ethics and policies when helping an employee answer an ethics or compliance question. All of these actions set the tone about the importance of the compliance and ethics program.

- **Constant vigilance**: Monitor your work group for signs of potential problems, such as increased employee absenteeism and turnover, poor morale, a decrease in number of voiced questions and concerns and decreased productivity. You may need to ask for help to dive into the causes behind these changes in employee behavior.

- **Be intentional about the messages you send**: Be aware of your words, your actions and your underlying attitudes. Saying or doing something that sends the wrong message, such as “Do whatever it takes to get that done,” or laughing at an off-color joke speaks volumes about the location of integrity on the priority list.

- **Use your resources**: If you need any assistance to properly address an employee question or concern or in handling signs of misconduct, reach out to any of the resources provided by the university — including Human Resources, University Counsel, this Office (Compliance), or your own supervisor.

**Conclusion**

As a manager, you play a pivotal role in building and sustaining our culture of integrity. Part of that role is supporting our ethics and compliance program. Only with your help can William & Mary fulfill its commitment to integrity, excellence, and respect.

For more information about William & Mary’s compliance and ethics program or the Office of Compliance & Policy, please visit [http://www.wm.edu/offices/compliance](http://www.wm.edu/offices/compliance).

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