The Ideal Compliance Team

I have previously written about The School for Ethics and Global Leadership (SEGL) in Washington, DC, a high school semester boarding program that I co-founded in 2009 whose mission is to prepare our country's future leaders to be ethically strong and internationally aware.

I recently attended one of the school's signature classroom lessons. The topic was leadership styles. It quickly became apparent that some of what high school juniors are learning at SEGL is directly relevant to what companies can learn about crafting effective internal FCPA/anti-corruption compliance teams.

Many have written about the various actors that should be involved in compliance activities (Tom Fox discusses them here). For example, it is important that compliance teams include representatives from legal, human resources, accounting, and audit.

Business leaders tasked with building teams would also be wise to ensure that diverse leadership styles are represented on compliance teams. Consider SEGL's lesson plan on leadership styles. SEGL's Founder and Director, Noah Bopp, describes it this way:

> This lesson draws on the work of David W. Merrill and Roger H. Reid, who first published their work in 1981. I first did a version of this exercise in high school, and it has stayed with me every since. I begin the exercise by asking two questions:
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> QUESTION 1: When you are in a group discussion, do you tend to be among the first and most likely to speak, or do you tend to observe, speaking only when there is something that needs to be said?
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> QUESTIONS 2: When you have to make big decisions, do you make them primarily with your head or your heart?
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> Students use their answers to divide themselves into four groups: those who tend to talk first and act with their hearts, those who tend to talk first and act with their heads, those who tend to observe and act with their hearts, and those who tend to observe and act with their heads. (It is worth noting that Merrill and Reid use somewhat different questions; I have adapted their work for high school students.)

I then give each group a task. After each group completes it and the students present their work to each other, they learn that the point of the exercise had nothing to do with the task itself. Instead, it highlights the social and leadership styles of each group. For example:

The Expressives. Those who tend to talk first and act with their hearts are enthusiastic visionaries. They have big ideas, and can generate creative thinking about what is possible. On the other hand, they may not have a finely-tuned sense of what is practical. They also tend to need approval from others, and when they do not get it, their feelings are easily hurt.

The Drivers. Those who tend to talk first and act with their heads are goal-oriented achievers. They are rational, sure of themselves, and ensure a group accomplishes the task at hand. On the other hand, they often lack empathy, caring less about feelings and more about getting things done. This lowers group morale and prevents key contributors from feeling heard.

The Supportives (or Amiables). Those who tend to observe and act with their hearts are empathetic teammates. They make sure to validate each group member and make sure she or he is enjoying the task. On the other hand, they may put so much emphasis on group harmony that they avoid conflict. They also care less about the final product, which can affect results.

The Analysts. Those who tend to observe and act with their heads are logical and detail-oriented perfectionists. They make sure the task is completed with high quality and love to revise and rethink their work. On the other hand sometimes they are such perfectionists that they do not accomplish the task on time. They can also prefer independent work to collaboration.

The discussion that follows is always revelatory. Many notice the essential learning: that a group needs all four styles in order to be successful. This may mean choosing group members wisely, though one cannot always chose one's co-workers, teammates, or family. More often, it means being attentive to any gaps in a group dynamic and taking responsibility fill them. It also means working on your own personal growth area: for example, the Expressives should focus, the Drivers should listen, the Supportives should advocate, and the Analysts should collaborate.

To make a compliance program successful, it is good to have an Expressive, a Driver, a Supportive, and an Analyst each represented. The Expressive can offer big, creative ideas on

how to integrate compliance into a company's operational fabric. The Driver helps ensure that specific tasks are accomplished in the roll out and maintenance of the program. The Supportive will help promote consensus building and stakeholder buy-in from your various operations. The Analyst will work on quality control and make sure that decisions are based on sound research and data.

Compliance work is not easy. Adjusting a company's operations to embrace compliance programs, and then ensuring that company personnel are conforming to its rules, is difficult. Companies must strike the right balance between detail and discretion in the rules and between a values-based, rules-based approach. They must strive to achieve genuine buy-in from key personnel, including the sales teams on the international front-lines. To do this successfully, it is important that different leadership strengths be brought to bear.