A culture of learning: reinforcing a firm's values, ethics and culture through building a learning environment in compliance

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Abstract

As financial institutions globally try to resolve legacy conduct issues and rebuild trust with clients, recent congressional hearings showing senior banking executives being challenged on systematic misconduct within their banks are a stark reminder that work on organisational culture in the sector is as pressing now as at any point during the banking crisis of the last ten years. If positioned well in the organisation, compliance should be a culture-carrier and be present at those crucial moments when important decisions are being made. Compliance can provide the check and challenge on organisational culture, values and ethics, but this requires compliance professionals to have a very different skill set from the legal and compliance officers of the past. While some of these skills can and should be taught, the dynamic nature of the business in this digitised, disrupted sector means learning is likely to be much more effective if it becomes part of 'the way we do things around here'.[1] The authors share their experience in building the skills and capabilities required for compliance to ensure business is 'complying with the spirit as well as the letter

of prevailing regulation and law'.[2] *This paper will also explore what is required to advance towards a learning culture where learning and innovation happen organically and spontaneously rather than programmatically.*

INTRODUCTION/OVERVIEW

Month by month the global tally of regulatory fines and penalties across the financial sector continues to rise. Some hopefully signal closure of legacy issues, but others are current and show misconduct occurring on an industrial scale within the sector, suggesting the industry still has a lot to learn. Part of the desired culture so heavily debated and sought could be better realised if learning became a natural part of what we do at work, rather than something which we occasionally attend.

The term 'places of learning' is typically associated with schools, colleges and universities and it is of note to wonder why is it not associated with the places of work where we spend a large proportion of our lives. One should ask if real learning should be the preserve of academia and limited to the few years we get if fortunate enough to immerse ourselves in those places. It should also be wondered, if it may not be possible to live the life of a college student indefinitely, why one should leave the keen satisfaction of discovery, growth and development behind just because we have left the ivy-clad institutions. Equally, one should consider why organisations and control functions within them often struggle to learn and improve continuously rather than via specific programmes and why innovation often feels like a foreign concept.

Part of the answer may be in found in examining the skills that compliance officers were required to have in the past, the role they were asked to play and the environment in which they operated. It is perhaps basic to suggest building a learning culture is the answer, as in reality there has always been one. It is human nature to learn 'acceptable' behaviour from what we see around us; what is encouraged and what is rewarded. The challenge, therefore, is being clear about what the desired environment and culture should look like and then being determined in its pursuit.

As compliance professionals in this sector, the authors believe it crucial to build that culture within compliance so we can be a carrier of culture into the business. We must be at the vanguard of doing – and helping the organisation to do – what is right for our customers and other stakeholders. Establishing the desired environment and culture is one of the strands that can help realise that vision. This is a long game – corporate culture in the financial sector today is not just about stopping misconduct: it is about doing great things in a disruptive and rapidly transforming sector. The cause of our current approach at Barclays was the 2012 Libor scandal, a crisis of our own making that was one of the single biggest threats to the bank in its 300 years plus history.

The unequivocal case for change

The bank was progressing well at the start of 2012 after navigating the 2008 financial crisis and having concluded a significant acquisition of elements of the old Lehman business. Within the year, however, the Libor crisis had broken; both CEO and chairman had left the organisation in rapid succession and the bank had received a significant fine, large by the standards of the day, but small in comparison to the reputational damage suffered and the cost of what many customers saw to be an egregious breach of trust.

While seeking to understand the causes of the crisis, the board commissioned Sir Anthony Salz, a leading solicitor, to perform an independent review of all the banks' business practices. The review was extensive, taking eight months to complete

and when reported in April 2013, highlighted a number of issues, some fairly damning.

> 'it is our view that this rapid journey, from a primarily domestic retail bank to a global universal bank twenty or so years later, gave rise to cultural and other growth challenges. The result of this growth was that Barclays became complex to manage, tending to develop silos with different values and cultures. Despite some attempts to establish group-wide values, the culture that emerged tended to favour transactions over relationships, the short term over sustainability, and financial over other business purposes. To some extent these characteristics were reflected in the broader business environment. But the overriding purpose at Barclays in the lead up to the crisis and beyond was expressed in terms of increases in revenues and profits, return on equity and competitive position. The drift in standards was manifest in the events that set the context for this Review. Barclays was not alone – many of its problems were also experienced by other major banks. But Barclays can take no comfort from this. Indeed, we believe that generally banks took too much comfort from some business practices being standard in the industry'.[3]

The organisation responded at the time with a comprehensive programme of work. A significant proportion of the programme related to addressing the cultural issues identified in the report. These included:

- Establishing a clear purpose statement for the organisation, supported by values, statements and behavioral indicators. The bank focused on securing the hearts and minds of all employees to that purpose and made it clear that responsibility for the organisational culture resided with each and every individual and applied to everything that they did for the bank;
- Making difficult choices on what business to do and where to do it, recognising that

some of what we had done in the past was not commensurate with the purpose we had chosen for ourselves for the future;
- Creating processes and systems that support the agreed values, eg recruitment, performance management and promotion processes that encourage and reward the desired behaviours; and
- Focusing on all areas of conduct and our clients as well as building frameworks to guide better decision making.

The Salz Review had also highlighted that

> 'The decentralised business model had tended to contribute to weak central controls over business units and lessened the independence and effectiveness of some of the control functions, notably Compliance'.[4]

It was understood that if compliance is to do its job properly it must be present at all of the crucial times in the business life-cycle and when the important decisions are being made across the bank. Compliance should therefore be a crucial supporter of culture change, reinforcing ethics, standards and values. The Salz Review made it clear that the federated compliance structure contributed to weak central controls and it was also recognised that the historical skillset of compliance was not aligned to the role it would be required to play in the future.

The structural issue was resolved by creating a group compliance function, covering all of the bank globally, led by a Group Head of Compliance who sits on the Group Executive Committee, reporting into the Chief Executive and the Chairman of the Board Committee responsible for Reputation, Conduct and Culture. While moving from a federal to a group model brings certain challenges, it definitely enabled a systematic and strategic focus on transformational learning.

Compliance learning – building the foundations

Salz had been clear that 'when learning stagnates, the old constraints needed evolution'[5] so we set out to build a compliance

function of over 1,700 colleagues, spanning our global footprint – and learning needed to be at the heart of that build. While the healthy learning environment was the ultimate prize, we suspected that more conventional learning would be an important foundation for that ambition.

Our strategic objective was to build confident, capable compliance officers who could be the carriers of culture into the organisation; who would build partnerships with the business and be trusted advisers whom the business would listen to and respect. This model compliance officer needed to understand the business, regulatory landscape, broader financial system as well as the economic and political environment in which the bank operated so that the control structures created and advice provided was relevant and commercial but also commensurate with the desired conduct and culture. At the same time, and as important, they needed to have the soft or tactical skills that allowed them to convert their knowledge and experience into value for the bank, all whilst occupying the nuanced position relative to the business where closeness brings the risk of losing independence and becoming conflicted, and too much distance risks being seen as out of touch or irrelevant to the front line.

The emerging vision for what the compliance officer needed to look like drove some crucial decisions in the creation of our Compliance Career Academy (CCA) at the time:

- We turned to academia to bring some of the spirit and ethos of the university into the compliance function. We partnered with Cambridge University whose Judge Business School had established a Centre for Compliance and Trust that was particularly well positioned to support us in the issues that we were tackling;
- We chose to make the most significant investment in our junior colleagues. If we really were playing the long game and building for the future then building our

analyst and graduate population could take the function into the future; and
- We focused on building those skills essential to the new compliance world: trusted adviser, partnership skills, balanced with courage to intervene when necessary.

CCA Level 1 programme for analysts and graduates

The analyst and graduate programme (Level 1) we built with Cambridge comprises a 2-year Certification in Compliance and was open to every colleague at the level globally. The programme consists of eight separate modules, all requiring pre-work, two or three days of face-to-face lectures, jointly developed and facilitated by Cambridge faculty and Barclays subject matter experts: every module also requires an output graded by the university. Colleagues are required to pass all modules before being certified. The range of topics covered ties back to the desired skill set, see Table 1.

CCA Level 2 programme for Assistant Vice Presidents and Vice Presidents

For our more senior colleagues such as Assistant Vice Presidents (AVPs) and Vice Presidents (VPs) we have used a series of regional summits (Level 2) where all colleagues at this level have gathered in our regional hubs in London, New York, Johannesburg and Singapore or Hong Kong, to focus on exploring challenges and learning skills to support their status as trusted adviser. We have partnered with Cambridge in the design of these summits which run for between 100 and 120 colleagues at a time but have also used a range of providers to ensure challenging and diverse experiences. Some of the topics broached are contained within Table 2.

CCA Level 3 programme for directors and managing directors

Lastly, our directors and managing directors meet as a Leadership Community (Level 3) in

Table 1:   Topics covered in CCA Level 1

1. What is compliance?	• Understanding of the crucial importance of compliance in post–crisis context • Knowledge of headline policies and procedures • Understanding of the significance of values–led behaviour in compliance practice • Understanding of the role compliance professionals have in influencing and supporting behaviour
2. Global financial system	• Overall understanding of financial markets • Understanding Barclays' role and position within the financial system • Understanding and assessing bank financial statements and operations
3. Understanding the regulatory environment	• Understanding of the global regulatory architecture and recent developments • Knowledge of global and national bodies, institutions and government structures involved in the regulatory process • Acquiring the necessary tools to understand the regulatory process • Understanding the evolution of regulation and its purpose and priorities • Understanding the effects of the regulatory environment on the banking industry and the management of banking businesses • Understanding the effects of regulatory processes on the compliance function
4. Products and services	• Understanding the relationship between retail and wholesale banking • Understanding the role of the retail business within the broader context of the universal bank and markets as a whole • Understanding different types of products and services a bank deals with and provides • Knowledge of the function and characteristics of different products • Understanding the risks and challenges associated with various products • Assessing the risks and compliance-related challenges associated with various products • Understanding client demand for products and services and their main purposes • Knowledge of the essential implications of the sale and provision of the various products and services • Developing an understanding of the interactions between the compliance function and the business across the product lifecycle
5. Conflicts of interest	• Understanding how conflicts of interest may arise • Ability to analyse instances of conflict • Understanding process for assessing and mitigating conflicts • Examining how a conflicts governance framework is constructed • Understanding the importance of management of information and confidentiality • Understanding the reputational context crucial to managing conflicts of interest
6. Financial crime	• Familiarisation with types of financial crime and the ways in which it can occur • Understanding the bank's involvement and vulnerabilities • Understanding compliance mechanisms and how they can be used to detect and prevent financial crimes
7. Behaviours and practices	• Understanding why people act and respond in a particular way • Knowledge of how to communicate successfully to affect behaviour • Understanding how to analyse and respond to information and events
8. Conduct risk	• Exploring the development of conduct risk globally, both as a new agenda and an enhancement of existing regulatory approaches • Exploring the implications of conduct risk for firms as well as compliance professionals • Examining the ways in which banks and other financial institutions adapt to the new regulatory regime, the challenges of implementing effective frameworks and processes to manage conduct risk activities

London to deal with the same issues as our Level 2 colleagues but with the focus on leading themselves and others through those issues.

Current position: taking stock

Three years into the programme, many of the fundamentals are in place that allow us to advance towards the desired learning culture.

Level 1: At the end of 2016 over 470 colleagues have enrolled in the programme and just over 170 colleagues have completed and received their certification from Cambridge University. During 2016 we

Table 2: Topics broached in CCA Level 2

Self-awareness and relationship management	Use of psychometric evaluation tools offering colleagues an individual assessment highlighting their strengths and areas for development while showing how they can be more effective in making connections with peers and the business.
Trust	Understanding types of trust and factors that influence why we trust (reputation, demonstration of competence, prior experiences, stereotypes). A set of interactive exercises demonstrated the ways in which trust influences actions and relationships (red/blue game based on game theory).
Leadership and followership	Using the theory of followership to examine how those who follow can be influenced to take ownership. Focused on the context in which followership/leadership happens and how it relates to effectiveness.
Influence	Understanding different forms of influence and sources of power, the factors which can create influence and how these can be used in practice through communication.
Dealing with paradox in the workplace	Techniques to deal with some of the paradoxes inherent in our role and the business eg focus on the here and now versus the future; using emotion and intuition versus relying on data and evidence; focusing on the day job versus fighting fires; being a trusted adviser versus being the 'police' etc.
Personal effect and managing difficult conversations	Use of a UK theatre company to help colleagues understand physical presence and effect. The company also ran interactive and immersive session on understanding transactional analysis and how to steer conversations away from parent–child interactions towards constructive adult–adult dialogue.
Making and supporting difficult decisions	Understanding the potential for decision-making to be compromised by cognitive biases including confirmation bias; fundamental attribution error (FAE); self-serving bias; belief bias, framing; hindsight bias etc and how the use of decision frameworks can help us and the business to make better decisions and guard against error and misconduct.
Innovation	Using a tech education startup to help colleagues understand the skill and practice of innovation. Recognising that innovation is like a muscle that need to be flexed and trained in order to build capability.

piloted a rotation programme where 15 colleagues from the Investment Bank front office spent three months in a control function. They joined compliance colleagues for three modules of the Level 1 programme and provided a very useful addition to the course dynamic, with insights and experiences from the front line to supplement the academic and compliance knowledge in the room.

During the year we also conducted an impact study to assess whether the programme was achieving the desired results. The review was led by Cambridge and independently overseen; see Table 3.[6]

In addition to the Level 1 programme, the Level 2 and 3 programmes have delivered 38 regional and international summits over a two-year period, over 7,000 man days of learning. These summits have been supplemented by a masterclass skills programme for leaders and the creation of a Compliance Faculty, a cadre of leaders building their skills in coaching, mentoring, facilitation and teaching in preparation for the next phase of learning where learning is realised through the work, not separately from it.

The learning culture – conditions for success

Having made significant progress so far, the next strategic aim is to move from an environment that builds and supports the strong, capable compliance officer of today to equipping the compliance officer of the future.

Part of that is the 'what to learn', which challenges colleagues to understand the disruptive nature of the industry and recognise the enormous effect of the digital consumer on the products and service of the sector. The other part is the 'how to learn', which is where the seismic shift is to be realised. It is no longer just about building skills and asking/expecting people to do things differently: we need to change the way we lead and reward and make time for learning

Table 3:   Extract from Level 1 Impact Study[6]

1. Areas of individual impact
   - The programme has been instrumental in enabling the *acquisition of new knowledge* on a variety of topics at a technical, managerial and behavioural level, broadening the scope and perspective of the participants' work and their ability to make complex judgments.
   - *Critical thinking* has been enhanced developing participants' ability to surface hidden assumptions and to evaluate information in a systematic way.
   - The findings revealed that the programme helped participants develop *independent thinking* as corroborated by more than 70% of attendees.
   - *Self-confidence.* The study also showed that 76% of people thought the programme had helped build confidence in asking the 'right' questions, to perform in the current role as well as ability to progress to new roles.
   - *Quality of decision-making* was enhanced in terms of questioning and the ability to make more informed decisions. Of the participants, 74% claimed that the programme helped in identifying risks and addressing bias in decision-making.
   - A primary feature of the programme appears to be the way in which *influence and persuasion* skills have been developed, manifested by effective persuasion, empathy, understanding of the other as well as ability to make compelling presentations.
   - The L1 programme has had a very positive effect in terms of *career development*, according to 83% of participants.

2. Impact on compliance as a function
   - *Networks and collaboration.* Participants identified the creation and development of networks and collaboration as an essential positive effect of the CCA L1 programme. Specifically, 76% believed the programme has enabled compliance to promote effective engagement between different parts of the organisation.
   - *Enhancement of the profile of compliance.* There is wide agreement that L1 is CCA's flagship programme. Of the respondents, 85.3% claimed the programme has had a positive effect on the way compliance is viewed as a confident second line of defence.
   - *Employee engagement.* From the data it can be claimed that the L1 is associated with higher levels of employee engagement, facilitating integration, recruitment and attracting talent as well as contributing to staff retention.
   - Insights from the study also show that the L1 programme is becoming an integral part in helping *build a learning organisation*.

to happen. We also need to be clear about what the desired environment and culture should look like so we can be focused in our efforts. While learning culture is arguably an example of a microculture operating within a broader functional and organisational culture, many of the characteristics required for a successful learning culture align entirely with those broader cultural desires.

A place where leaders own and drive the desired culture

While the sponsorship of the senior leader is crucial, the buy-in and support of all leaders in the community needs to be secured if change in culture is to be achieved:

'The connection between culture and leadership is clearest in organisational cultures and microcultures. What we end up calling a culture in such systems is usually the result of the embedding of what a founder or leader has imposed on a group that has worked out. In this sense, culture is ultimately created, embedded, evolved and ultimately manipulated by leaders.'[7]

Conceptually and intellectually this makes sense but realising support from a diverse range of leaders, many with their own agendas, priorities and challenges, is a complicated task. This takes time and negotiation if leaders are to be truly invested in the outcome. Any decision to pursue a new culture where the agreement is only superficially agreed or where consensus is achieved through the use of a three-line whip is likely to fail.

A study of the health sector identified the need for leaders to have a plan for improving the climate for learning:

'We thus suggest that active, inclusive behavior on the part of [physician] leaders may be an essential means of facilitating others' meaningful engagement in team-based quality improvement work. Thus, a key contribution of this study is the identification of an interpersonal strategy for improving the climate for learning …'[8]

Leaders therefore need to be vocal and active in support of any initiatives designed to support the desired change.

A safe place to learn

In addition to their role as sponsors and advocates, leaders need to create an environment where it is safe to learn. In doing so they will

'lower the psychological costs of speaking up and raise the psychological costs of silence'.[9]

If we want an environment where colleagues are innovative, creative and challenging we need to create a space where it is both safe and encouraged to operate outside the norm. If we consider the 'norm' in this circumstance to be that set of any individuals skills that sits in the middle of their performance, ie the good solid performance that delivers reliable and stable outputs, there is a risk that focusing on that middle ground is done at the expense of understanding the performance on either side of the norm.

Making mistakes

On the one side sit those experiences which might be classified as poor performance, but could equally be seen as one of the richest sources of learning: the place where mistakes are made. Creating a safe environment practically means creating a place where it becomes ordinary to talk about making mistakes so this is recognised as a normal thing to do, where mistakes generate data from which to learn and improve.

Adopting a positive attitude to mistakes is certainly one of the more complicated changes to ask a control function to adopt. Many things in the environment suggest that failure is not an option, such as regulatory messages, low risks appetites, digital consumers who expect absolute resilience and who will turn to social media with any suggestion of failure, all of which subliminally suggest mistakes are undesirable. By contrast, in our fast paced, disrupted industry our competitors are acutely aware that making mistakes (and sometimes outright failure) are crucial prerequisites to getting it right. A quote attributed to Elon Musk,

'Failure is an option here. If things are not failing, you are not innovating enough',

is a powerful indicator of the learning culture embraced in innovative businesses.

For the leader, the willingness to speak positively about the mistakes of an individual and to role model what they expect of others can be a challenging example of being the 'servant-leader',[10] where leaders focus on the needs of the team rather than their own needs and are willing to break some of the perceived taboos of the culture; this is to move towards the culture that is desired.

Being excellent

In the same way that it is challenging to talk about mistakes and failure. It is sometime considered culturally inappropriate to talk about success, particularly when it could be perceived to be boastful or self-centred. This is sensitive ground again but if a culture is to promote excellence it needs to be able to discuss the potential of the individual with pride and confidence in order for colleagues to know it is safe to bring that full range of potential and talent into the workplace.

A place where learning is recognised and rewarded

The good news is that a learning culture (of sorts) is already firmly in place in the workplace. We know it is human nature to learn and adapt to the world around us so as to be sure our needs are met. This is quite clear to observe in young children, where behaviour reflects the environment and behaviours of parents and careers. As we become older the responses to our environment are more complex but there is still a strong correlation between what people are

recognised for and how they are rewarded and behave.

In the organisational context recognition is demonstrated an a number of ways, explicitly and implicitly. Who are the star-performers? Who gets promoted? Who get the corner-office? Who get the best opportunities? And for everyone who falls into one of those categories there are equally telling questions. Who are not the star-performers? Who does not get promoted etc? Thus recognition and reward are incredibly powerful indicators as to what is important to an organisation. If recognition supports the stated culture then colleagues can see the congruency: if it does not then colleagues are conflicted between doing what you have said you want them to do and that which you reward.

Within the Financial Sector much work has been done around remuneration structures, malus and claw-back but it is also easy to see how an external observer (or average employee) could think that nothing at the top of the house has really changed.

For a learning culture to take hold in compliance, and consequently spread into our businesses, we need to look carefully at the messages we send directly and indirectly and make sure they align with the behaviours and culture that we aspire to.

Conclusions

Compliance evolution or compliance revolution? Either way, the role of compliance needs to change to keep pace with an ever changing financial sector eco-system. Courage and the ability to assess and influence behaviour in non-traditional ways (ie reporting lines and remuneration) are prerequisites for the compliance officer of the future. Alignment of the compliance team with the values of the firm and a clear mandate to champion a new model for behaviour is required, where silence is not golden, where mistakes can be made, where accountability is not just a word but an ethos.

Useful considerations

A useful resource is the following five 'questions/keys toward a learning culture'[11] shared by our partners at Cambridge. They provide a useful mechanism to self-assess an environment.

- What are the processes and organisational levers for generating and transmitting ideas and experiences? To what extent is 'slack' considered to be legitimate?
- What are the collaboration mechanisms for the origin, flow and mutation of ideas in the organisation? Who gets credit for implemented ideas?
- How do social preferences affect the flow and appropriation of ideas and experiences? To what extend do they impede diversity?
- What behaviours are rewarded in the organisation? Who are the role models embodying exemplary behaviour?
- What are the mentoring processes? How are individuals socialised/mentored into a learning opportunity?

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