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Ethics scandals show no sign of abating: Wells Fargo's fake accounts scandal, Volkswagen's emissions scandal, massive breaches of personal data at Equifax and Yahoo, entanglement of Facebook and Google in foreign meddling in the 2016 U.S. presidential election, the #MeToo movement's exposure of discrimination and sexual harassment. These are just some of the more glaring ethics failures in recent times. Reputations crumble, valuations tumble. Shareholders, customers, employees, and other stakeholders get hurt. What should companies do to guard against such ethics failures?

Both regulatory guidance and corporate practice have been biased strongly toward compliance management, which is focused on decreeing rules, monitoring behavior, and sanctioning transgressions. A methodology for strengthening self-regulated ethical behavior is largely missing. The result: widespread compliance fatigue among employees and, as a result, diminished effectiveness of ethics and compliance (E&C) programs. This article explains how promoting greater self-governance helps companies strengthen their resilience against unethical behavior, reduce compliance fatigue, and re-engage employees.

THE IMBALANCE BETWEEN ETHICS AND COMPLIANCE

Why should E&C practitioners pay more attention to ethics management? Still a relatively young profession, compliance management has had an impressive career. Donna Boehme, a leading voice in the E&C profession, recently declared that Compliance 2.0 has become the new normal and, by some people's accounting, we already have reached Compliance 4.0 (Boehme 2016). Indeed, compliance management has come a long way. The requisite elements of a compliance program are well understood, and most E&C professionals can rattle them off without hesitation. There is a well-developed shared understanding of the compliance officer's role.

But what about the "E" in "E&C"? Who can name the hallmarks of an ethics program? Are they distinct from those of a compliance program? And if so, what are the specific goals and methods of an ethics program? On these questions, consensus remains elusive among E&C experts. As a result, ethics management has endured a rather orphaned existence. Both regulatory guidance as well as dominant E&C practices display a flagrant compliance bias, with a cost to program effectiveness, as I will argue.

More about this later. The distinction between compliance and ethics management as distinct approaches first requires a definition of the underlying terms.

COMPLIANCE VS. ETHICS— WHAT'S THE DIFFERENCE?

The intention behind an action is central to the distinction between "compliance" and "ethical behavior." Compliance is simply behavior in accordance with someone else's requirements in order to gain rewards or avoid punishment. By contrast, when people act ethically, they are self-governed. Ethical behavior is prosocial behavior for its own sake. People engage in it for no other reason than that they view it as the right thing to do. As such, ethical behavior is intrinsically motivated.

If person A saves an unknown person B from drowning absent an apparent personal benefit, we are inclined to praise A's action as ethical. If to the contrary, we learn that person A had agreed to come to person B's rescue only after having been promised an award of $1,000, we no longer would characterize the same rescuing act as ethical.

The locus of causality is thus a central distinguishing feature of compliance on the one hand and ethical behavior on the other. When persons comply, they are governed by some authority outside of themselves. When people act ethically, they are self-governed. Ethical behavior requires an element of free choice. As the external pressure to perform a good deed increases, its ethical character diminishes. The same can be said about a variety of other terms commonly used to refer to similar behavior. Examples include "moral" behavior, "moral

agency," "self-governing" or "self-regulated" behavior, and "acting with integrity." In contrast to "compliance," common usage of these terms typically presumes an intrinsic motif underlying the behavior. For the purposes of this article, I, therefore, treat these terms synonymously.

THE MANY FACETS OF ETHICAL BEHAVIOR

The ability to act ethically is not exhausted by the mere observance of rules. On the contrary, ethical behavior has many facets (and may sometimes require rule breaking). To develop a comprehensive understanding of the diverse ways in which employees can contribute to sustaining organizational norms, it is useful to consider Albert Bandura's concept of moral agency (Bandura 2006).

As moral agents, people are not just products of their normative environment; they regulate their own behavior and participate in shaping the social norms governing their communities. Moral agency refers to the ability to monitor one's conduct, to judge it in relation to one's personal identity and moral standards, and to regulate one's behavior through self-sanctions. Moral agency has two aspects. The inhibitive aspect of moral agency is expressed in the power to refrain from harmful acts, as manifested in the Hippocratic Oath taken by physicians (*primum non nocere*—first, do no harm).

The second, or promotive, aspect of moral agency refers to the ability to enact prosocial behavior. In an organizational context, promotive moral agency can be expressed in many forms. Employees can play a preventative role in maintaining social norms, for example by role-modeling social norms, being attentive to risks, developing risk mitigation measures, injecting ethical considerations into decision-making processes, voicing concerns and divergent perspectives where necessary, encouraging others to act

ethically, or counseling, supporting, and praising others in their ethical agency. Employees also can demonstrate their moral agency by intervening in acute situations, by practicing prosocial dissent against misconduct, enlisting support from the E&C department or other appropriate governance functions, assisting victims of misconduct, or protecting whistleblowers from retaliation.

Further, Bandura points to the fact that moral agency can be exercised directly by the individual (individual agency), as a group (collective agency), or through influential others (proxy agency). Employees drawing on help from a senior manager or the E&C department is an example of proxy agency. Multiple employees taking coordinated action to raise awareness about discrimination is an example of collective agency. A single person raising objections against a risky business proposal is an example of individual agency.

Self-efficacy refers to people's belief in their personal capacity to exercise control over their lives, whereas collective efficacy refers to people's shared belief in their conjoint power to produce desired results.

As Bandura points out, in order to be effective moral agents, people must believe in their own efficacy as moral agents (Bandura 1982, 1991, 1997, 2000). Self-efficacy refers to people's belief in their personal capacity to exercise control over their lives, whereas collective efficacy refers to people's shared belief in their conjoint power to produce desired results. A strong sense of efficacy increases one's likelihood to confront challenging situations, set

more ambitious goals, exert more effort, be more resilient in the face of opposition, and accomplish one's objectives. Without a sense of efficacy, people tend to behave ineffectually, even when they know the right course of action.

The task for organizations then is to support employees' beliefs in their capacity to act successfully as moral agents, and to refrain from practices that undermine their sense of moral efficacy. To the extent that an organization succeeds in doing so, it increases the likelihood of employees choosing intervention over bystander apathy when organizational values are at stake. Moral agency may become "the way we do things around here," an emergent behavioral pattern, occurring frequently enough to shape the expectations its members hold about each other's behavior. Under conditions of such civic governance, group constituents are both subject and object of their social norms. They govern and are governed. They are a law onto themselves.

JUST DO IT: HOW COLLECTIVE MORAL AGENCY SAVED NIKE'S VALUES

At Nike, a group of employees recently provided us with a vivid illustration of how employees can make a vital contribution to defending a company's values by engaging in these types of moral agency (Creswell and Draper 2018). Nike is famous for its ad campaigns that celebrate the human capacity to win by persevering and overcoming adversity while playing fair. A group of women working for Nike insisted that these values should apply to the treatment of employees as well.

After a series of reports to human resources about gender discrimination and sexual harassment had been ignored, these employees, exemplifying the company's inspirational "Just Do It" slogan, conducted an informal survey among their female peers, inquiring whether they had been victims of sexual harassment or gender discrimination. In early March 2018, the completed

questionnaires landed on the desk of Nike's chief executive. Ignoring the problem was no longer an option. In the weeks that followed, at least 11 top executives were forced out and the company's human resources procedures were subjected to a comprehensive review.

Playing to win while playing fair and perseverence coupled with good sportsmanship are values integral to Nike's brand allure. The employees at Nike who stood up against discrimination and harassment exemplify this ethos as well as any of the athletes celebrated in Nike's advertisements.

We have seen similar forms of ethical employee activism elsewhere. A petition signed by some 4,000 employees pushed Google to let a lucrative contract with the Pentagon expire that would have involved the company in artificial intelligence work to improve the targeting of drone strikes (Wakabayashi and Shane 2018). Employees at Amazon joined civil rights groups and investors asking Chief Executive Officer Jeff Bezos to stop selling the company's facial recognition software to law enforcement agencies (Condliffe 2018). Microsoft employees presented the company's chief executive, Satya Nadella, with a petition signed by more than 300,000 people that called on the software maker to cancel its contract with the Immigration and Customs Enforcement agency (ICE) so as not to be complicit in the separation of families (Frenkel 2018).

As these examples underscore, people have a capacity for moral agency. Companies should consider how they can utilize this capacity to strengthen their ethical resilience.

TWO DISTINCT MANAGEMENT APPROACHES
The distinction between compliant and ethical behavior described above provides the key to a meaningful differentiation between compliance management and ethics management. Compliance management aims to

induce compliance from outside. Management acts as an external regulator, assuring compliance through formal, hierarchical enforcement. It codifies and communicates institutional norms to employees, monitors conformity, and reinforces norms through sanctions in keeping with a zero-tolerance policy. Compliance management views employees as risk factors and aims at suppressing unwanted behavior.

Ethics management, by contrast, views employees as valuable governance assets and seeks to support their capacity for self-governance. Not only are most employees able to regulate their own behavior in accordance with social norms, they also are capable of meaningfully contributing to the maintenance of these norms. The goal of ethics management is to make use of people's capacity for moral agency. It seeks to strengthen an organization's ethical resilience by harnessing the moral human capital embedded among its members. Ethics management supports members of the organization in fully actualizing their human potential for moral agency. It does so for example by encouraging a speak-out culture that invites employees to voice concerns about risks, propose mitigation or remedial measures, or otherwise contribute to the process of upholding social norms.

In short, compliance management is about the formal enforcement of norms, ethics management is about supporting informal self-governance.

LAW OF THE INSTRUMENT: IF ALL YOU HAVE IS A HAMMER …
Neither of these approaches is superior to the other. They simply address different aspects of reality. Compliance management addresses the fact that individuals may cause significant harm by violating social and legal norms. Ethics management accounts for the reality that most people are willing and able to align their behavior with social norms and actively contribute to their maintenance.

Drawing a clear distinction between these two approaches is useful. Two mental models are better than one. Having multiple mental models at our disposal improves our capacity to make sense of different realities and respond to them by choosing the most appropriate model.

As the psychologist Abraham Maslow famously quipped, everything looks like a nail when our only tool is a hammer. People tend to overly rely on a tool they are familiar with, even in the presence of better alternatives. Rather than adapting our tools to the problem we face, we may end up adapting the problem to the tools at hand. This effect is known as the law of the instrument. It has been observed in the prescription of drugs, for example. In the early stages of psychopharmacology, a variety of mental illnesses frequently were treated as psychosis, because such a diagnosis corresponded to the limited selection of available psychiatric drugs (e.g., Stelazine, Thorazine). The diagnosis of the disease is therefore often influenced by the treatments the doctor is familiar with.

Likewise, if formal enforcement methods are our only tool, we run the risk of treating all employees as potential delinquents. And because we lack a well-articulated model for unlocking employees' capacity for self-governance, their potential to contribute to organizational governance remains undetected and unused. That's the compliance bias. Let's consider an example.

OFFENDER TRAINING? NO, THANK YOU
Imagine you deliver anti-harassment training to a room full of employees. A training designed with potential offenders in mind will provide the legal definition of sexual harassment, inform participants about the sanctions they face if they are found in violation, and convey management's commitment to zero-tolerance enforcement. In all likelihood, it also will include scenarios intended to teach employees how to recognize harassment.

The problem with this script is that it collides with participants' self-concept. Most employees don't self-identify as potential offenders. To the contrary, many genuinely care about respect in the workplace. For these employees, a wide gap yawns between the offerings of such training and what participants consider useful. Studies demonstrate that the most well-intended training initiatives may be rejected by participants if they are perceived as thought reform or intimidation (Kulik et al. 2007). Other research confirms that people respond adversely when anti-harassment training threatens their self-concept (Dobbin and Kalev 2016).

In this misalignment may lie the key to understanding the widespread compliance fatigue among employees. More than two-thirds of employees reject compliance training as inefficient, irrelevant, and uninteresting. This is the finding of a Compliance and Ethics Training Benchmarking Report by CEB (now Gartner).[1] Against this backdrop, it also mustn't surprise us that, according to a Society of Corporate Compliance and Ethics study, a large majority of compliance practitioners describe their relationship with employees as being "adversarial."[2] According to CEB's 2014 RiskClarity Survey, only 3 percent of employees who observed misconduct took their misconduct reports to the compliance function.[3] None of this bodes well for the trust between employees and compliance functions.

At the same time, we know from fraud studies that employee tips are by far the most important source for detecting fraud.[4] It appears, though, that we have not yet found the tools to fully tap this source.

WELCOME TO CIVICS CLASS

Imagine now you have a second mental model, construing employees as capable of self-governance, and thus constituting valuable governance assets. Anti-harassment training would look very different under this premise. Such training would encourage employees to be engaged with their values and bring their moral agency to work. It would strengthen their ethical efficacy by exploring and rehearsing the strategies they can pursue, the resources they can employ, and the alliances they can form to defend the norm of non-harassment. The goal of this training would be as much to protect the organization as to ensure the well-being of its members. It would strengthen the skills that empower employees to contribute competently and effectively to maintaining a safe community for all.

This type of training would feel less like offender training and more like a civics class. Employees respond much more positively to interventions that engage them as ethically competent agents. When we approach our colleagues with an attitude of trust, caring, and support, they are more likely to respond in kind.

Suitable training concepts are available. For example, Giving Voice to Values (GVV), developed by Mary Gentile, focuses precisely on strengthening employees' ethical agency (Gentile 2013). It has been applied by major corporations worldwide, including Lockheed Martin, Unilever, and Prudential.

The benefits of reorienting our engagement strategy from coercive repression of malfeasance toward positive support for employees' moral agency are obvious: improved trust by employees in the E&C function, reduced compliance fatigue, greater involvement in detecting and eliminating risks, more competent intervention against misconduct, more reports from employees about potential risks and misconduct, and, as a result, greater ethical resilience for the organization.

TOWARD AN EVIDENCE-BASED PRACTICE

The task ahead of us is to correct the lopsided compliance bias. The basic building blocks for doing so are available. The social and behavioral sciences offer a rich repertoire of insights into ethical behavior and how to support it. Various lines of research make contributions to a better understanding of the human capacity for moral agency. Here is a sampling:

- The results of interdisciplinary research on human morality—from evolutionary biology (Wilson and Wilson 2007) to moral psychology (Hamlin et al. 2011; Bloom 2013; Wynn and Bloom 2013; Haidt and Joseph 2004; Haidt 2007) to neuromorality (Decety and Wheatley 2017)—provide abundant evidence of people's distinct ability to act ethically.
- Psychologist Albert Bandura's body of work describes the psychological process that underlies moral agency (Bandura 2006).
- Motivation research, particularly that based on Edward Deci and Richard Ryan's self-determination theory (Ryan and Deci 2017), allows us to understand the factors driving intrinsically motivated ethical behavior.
- Criminological research highlights the contribution of collective efficacy and informal social control to crime reduction (Sampson et al. 1997; Wikström and Sampson 2003).

Other lines of research indicate specific methods for promoting self-governing behavior in organizations:

- Newly emerging leadership models, such as shared leadership (Fletcher and Käufer 2003), indicate new avenues for leaders interested in supporting participatory governance practices.
- Educational research provides methods for strengthening ethical self-efficacy through training (Gentile 2013; Ormrod 2003).
- Social network analysis shows how human agency can be enhanced by modifying organizational network structures (Kadushin 2018).
- The so-called nudge concept points to the possibilities of supporting ethical decision-making by subtly changing the choice architecture (Sunstein 2014).

- The co-creation paradigm shows how social platforms can be used to engage employees in organizational governance (Ramaswamy and Gouillart 2010).
- Anthropological linguistics illuminates the role of institutional language and discourse practices in the social construction of an ethical organizational culture (Alvesson and Kärreman 2000; Kärreman 2014).

These examples merely hint at the rich repertoire of insights that the social and behavioral sciences offer for better understanding and influencing human behavior. The task of assimilating these insights into the canon of ethics and compliance practices has yet to begin in earnest.

FIVE DESIGN PRINCIPLES

The wealth of social and behavioral science insights also provides the source from which to derive guiding principles for the design of ethics programs, distinguishing them in a meaningful way from compliance programs. I propose the following five guiding principles for designing ethics programs:

Ethics management is a strength-based practice. It is focused on fostering the human capacity for moral agency rather than suppressing malfeasance.

Ethics management is autonomy-supportive. Ethical action is by definition self-determined action. Ethics management privileges liberty-preserving methods. It ends where coercive influencing methods begin.

Ethics management views governance as a co-creative process. Employees possess resources (contextual knowledge, ingenuity, agency) that are valuable for detecting and remediating ethical risks. Employees are thus considered valuable governance partners rather than risk factors. As such, ethics management seeks to enlist employees' active participation in the maintenance of organizational norms.

Ethics management is a human-centered practice. The potential for moral agency flourishes optimally in organizational environments that support people's basic psychological needs, values, and aspirations. If we want people's ethical capabilities to flourish, we must concern ourselves with their well-being.

Ethics management is an evidence-based practice. Ethics management builds on the best available science and enables continuous adaptive learning by subjecting its methods to rigorous empirical evaluation.

PROJECT ETHICS 2.0: TOWARD A SYNTHESIS

The most effective governance systems do not maximize formal enforcement at the expense of self-governance. As Cicero observed, justice can be ruined by the excessive enforcement of laws (*summum ius, summa iniuria*—supreme law is supreme injustice). Excessive emphasis on compliance engenders alienation and undermines self-governance by the many. If we govern behavior by relying exclusively on an ever-expanding regime of rules, surveillance, and discipline, we will end up ultimately in an Orwellian compliance bureaucracy.

The reverse also applies. Exclusive reliance on self-governance invites free-riding. A residual risk of deceptive behavior always lurks in the background, even in the best of organizations. The formal enforcement mechanisms that compliance management provides remain indispensable for making organizations resilient against deception by the few.

A well-balanced governance system requires both self-governance by its members and, if worst comes to worst, means for the formal enforcement of norms. Both are necessary; neither are sufficient conditions. Systems of formal enforcement are more effective in conjunction with the informal social control provided by a vibrant civil society that advocates for vital social norms. And, conversely, informal social control is more persuasive if backed up by formal institutions that can intervene in the event that informal social control does fail.

This is why compliance management is important but not enough. This is why we need more ethics management. Compliance management lacks the methods that are necessary to enlist employees' voluntary support for organizational norms. Lacking a well-articulated model for strengthening self-governance deprives us of the opportunity to engage employees positively as co-producers of organizational ethics. Let's design smart ethics and compliance programs that provide both: guardrails against misconduct and support for moral agency. ⬡

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