



TARGETING HEARTS TO WIN SHARE OF MIND

Through interactive games, entertaining videos, and other innovative initiatives, Dell is helping employees understand and internalize the importance of compliance

Written by Mike McLaughlin

*“Traditional wisdom says that you have to show people what’s in it for them if you want them to join your team, support your cause, work long hours or buy your product. Traditional wisdom is wrong. The secret to getting people engaged isn’t about showing them why it’s good for them. It’s the exact opposite. **It’s about providing people with a purpose that’s bigger than they are.**” — Lisa Earle McLeod, Management Consultant and Author*

As a compliance professional who spends a good deal of time thinking about how to win share of mind with our employee base for compliance topics, this quote resonates with me. For some time, moving compliance programs from rules- to values-based concepts was the most important transformation facing our profession. On the whole, I believe we’ve won that battle. Most compliance programs today emanate from a place of purpose and values, while still maintaining the appropriate focus on following the rules. The next challenge, in my view, is using the purpose and values that underpin our programs to win employees’ hearts and, in so doing, gaining the all-important share of mind that is the engine that drives the execution of our programs.

It’s not that employees don’t realize how important compliance is. Employees have an innate sense of how important it is to know and follow the rules. And for those who need an added incentive, today’s headlines are filled with significant enforcement actions with stark consequences for companies and employees that don’t



Whether crafting messages that resonate on an emotional level, helping employees make decisions that reflect their values, or encouraging teams to learn while having fun, the direction is clear: we have to win the hearts and minds of our employees if we expect compliance to remain top of mind.



adhere to the law. But while employees understand the importance of focusing on compliance topics, they are finding it harder and harder to find the time to do so. Virtually every moment of their workday (and many moments outside of their workday) is filled with important messages coming at them in every form imaginable—emails filled with critical business updates; IMs directing them to their next task; banners streaming across company Intranet sites touting the next HR initiative; posters in the cafeteria announcing an important marketing campaign; and texts, tweets, Instagram photos, Facebook posts, and cellphone calls about everything else. How can we, as compliance professionals, compete with all of this for a share of our employees' minds and, even better, keep our issues top of mind?

At Dell, we answer that question by targeting our compliance messages as much to our employees' hearts as to their minds. Our company has a purpose-driven strategy: to provide end-to-end technology solutions that give people everywhere the power to do more. We firmly believe that access to technology should be a right and not a privilege. So when our employees come to work, they are doing so not just to complete a set of tasks, but to do their part to help people everywhere live better lives. School children learn more if they have access to online libraries. Healthcare workers diagnose diseases faster with electronic medical records at their fingertips. And people with a laptop and an Internet connection can stay connected even when phone lines go down and roads close. Our employees truly believe they help make all of this happen through their work for Dell.

Our compliance messages start from a similar place. Dell is a company made up of overachievers with a passion for serv-

ing our customers, and for winning. Our key compliance messages build on that. We talk consistently about our value of "Winning with Integrity." Our Code of Conduct is entitled "How We Win." We believe these messages resonate with our employees on an emotional level. Our Code is written with this same goal.

Each Code section begins with an aspirational statement about what we believe in. For example, instead of beginning the Code section on Anti-Corruption with an explanation of anti-corruption laws, we begin with a statement about how corruption "impedes the development of trustworthy markets" and "hurts our company and the communities where we do business." We go on to explain the anti-corruption laws, so our teams have a lot to digest, but we begin by targeting their hearts and what they believe in.

Our awareness and training efforts are designed with the same goal. And it starts at the top. Our founder and Chairman, Michael Dell, speaks about ethics and compliance often, and he speaks from the heart. He talks about it with our worldwide executives both at formal events like our Annual Leadership meeting, and also informally to executives and all employees in the form of emails and chatter posts. When he speaks about compliance, he ties it to Dell's brand and reputation and stresses how important it is for us to earn the trust of our customers every day. Dell's other senior leaders do the same.

At the beginning of each year, we host a virtual meeting for all worldwide Vice Presidents specifically dedicated to ethics and compliance. During that meeting, we fill them in on the year's compliance priorities and we provide a takeaway to help them cascade those messages to their teams, in a manner that resonates with

Facts & Figures

1984
At the age of 19, Michael Dell founded PC's Limited with \$1,000.

1988
Dell completed their initial public offering, raising \$30 million and increasing market capitalization from \$1,000 to \$85 million.

1992
Dell debuted on the Fortune 500, making Michael Dell the youngest CEO on the list.

1996
Dell.com launched, generating \$1 million in sales each day just six months after the site went live.

2001
Dell became the Number 1 computer provider worldwide.

2005
Dell tops the list of "America's Most Admired Companies" in Fortune magazine.

2010
Dell was ranked the foremost healthcare information technology services provider in the world by Gartner, Inc.

2013
Michael Dell and private equity firm Silver Lake Partners bought back Dell from public shareholders to accelerate their solutions strategy and focus on the innovations and long-term investments with the most customer value.

their teams on both an intellectual and emotional level.

One example of this can be found in Dell's privacy and data protection program. Here, our awareness effort focuses on the trust our customers place in Dell

Dell is a company made up of overachievers with a passion for serving our customers, and for winning. Our key compliance messages build on that. We talk consistently about our value of ‘Winning with Integrity.’ Our Code of Conduct is entitled ‘How We Win.’ We believe these messages resonate with our employees on an emotional level.

each time they allow us to keep and manage their data and the importance of every Dell employee honoring that trust by following the rules and keeping our customers’ data safe. When we remind employees to keep their desks clean, appropriately label documents, and use encryption technology, it’s wrapped inside this message of earning our customers’ trust each and every day. We ask them to follow important, but fairly routine, controls, but for a higher purpose.

The vehicles we use to deliver compliance messages and training are also designed to target our employees’ hearts and minds. When possible, we opt for the personal touch of face-to-face meetings. If we can’t travel to a particular site, we train and deputize local leaders to deliver the message or we use virtual meetings or videos. We leverage the power of storytelling. One video series entitled “Speak Up” leverages both storytelling and humor by acting out various and somewhat humorous vignettes to drive home points about data protection, anti-corruption, and the importance of third-party vetting. Thousands of Dell employees have seen these videos. They are available online, are played at team meetings, and we take them with us to every site we visit.

A course entitled “Principled Leadership: Values-Based Decision Making” leverages both video and in-person, leader-led train-

ing to demonstrate how seemingly small, everyday decisions can lead to either really good outcomes and consequences or really bad ones. The class begins with a video showing a leader at a crossroads and, in alternative story lines, shows the good and bad consequences that occur, depending on which set of decisions he makes. Leaders use the video to drive a discussion among class participants about what seemingly small decisions they make every day and the potential consequences of those decisions to them individually and to the company. A values-based decision making model is then introduced, and the previously discussed decisions are viewed through the lens of that model. Course participants are encouraged to not only use the values-based model going forward, but to share and discuss it with their teams and encourage them to do the same.

Another way to make compliance messages top of mind with employees who already have so much to think about is to train them in a way that doesn’t seem like training. This year, we introduced game-based anti-corruption training, in collaboration with our training partner, LRN. Playing the online game entitled “The Honesty Project” trains employees on important anti-corruption concepts. Since this is the first year we are offering game-based compliance training, we made this course voluntary. On the very

first day it was introduced, slightly fewer than 3,000 Dell employees played, with 500 of them playing the game more than once. Moreover, 92 percent of them told us in our post-game survey that they recommended the game to their co-workers. We are working to develop more game-based education, with an eventual goal of making most online compliance training game-based at Dell.

Whether crafting messages that resonate on an emotional level, helping employees make decisions that reflect their values, or encouraging teams to learn while having fun, the direction is clear: we have to win the hearts and minds of our employees if we expect compliance to remain top of mind. Success starts small. The lexicon starts changing. Employees begin talking in terms of “believing” instead of simply complying because they have to. They share the stories you tell with their co-workers. And they vote with their feet by showing up at compliance events or taking training voluntarily on those occasions when it truly is not required. And then the success grows so that local leaders start to hold meetings about ethics and compliance with their teams, not prompted by the Ethics and Compliance office. Sites hold Compliance Days and put up banners and posters about doing the right thing and winning the right way, again unprompted from the center.

When this starts happening—when local leaders, sites, and employees start driving things that are in addition to, and complement, the programs we champion from the center—you have proof that you are on a path to a culture of believers, a culture of employees who will find time even in their busiest days to think and talk about ethics and compliance and making the right choices. For themselves. For your company. For the higher purpose.

Author Biography

Mike McLaughlin is Dell’s Chief Ethics & Compliance Officer and a Legal Vice President who leads the following global functions at Dell: employment law, employment litigation, ethics, compliance, privacy, and knowledge assurance. Prior to joining Dell in 2000, Mike was at Rohm and Haas Company (now a part of Dow Chemical Company) and Morgan, Lewis and Bockius. Mike graduated summa cum laude from Washington and Lee University School of Law and clerked for the Honorable Judge James L. Latchum, United States District Court, District of Delaware.

Facts & Figures



Dell’s website gets **65** interactions per second, **2 billion** total interactions each year, **5.4 million** discussions per day, and **3.5 million** connections via their social web community, all facilitated by over **100,000** team members.