Banking on team ethics : a team climate perspective on root causes of misconduct in financial services

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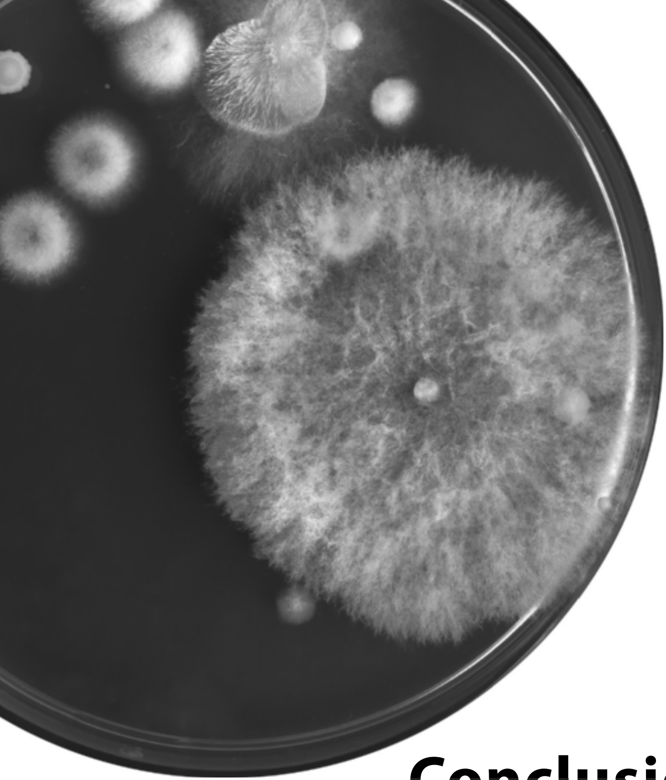
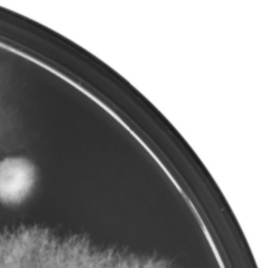


Part IV
Conclusions and practical implications for bank and financial supervisors

Chapter 10
Conclusions and practical implications



Chapter 10
Conclusions and practical implications

The current response to misconduct from banks and financial supervisors is insufficiently effective in preventing future misconduct. In the first Chapters I presented misconduct as a costly and continuous problem, that is yet to be addressed effectively. I argue that a team climate perspective is needed to identify and target the root causes of unethical behaviour, and herewith mitigate misconduct risk.

The team climate perspective is a blind spot for banks and financial supervisors. Attempts to prevent unethical behaviour focus on organizational level (i.e. values, culture change programs) or individual level (i.e. ethical recruitment tests, disciplinary measures). With Study 1, I showed that a significant bank was missing the team climate perspective in its own reporting and analysis of its misconduct cases. Team climate, that harbours social psychological root causes of unethical behaviour, is not a perspective used by banks when analysing misconduct. So, for banks, team climate is simply not in sight.

Financial supervision is in the position to put the team climate perspective in scope by asking banks to assess team climates and analyse the root causes of misconduct at team level. With Study 2, I showed that a supervisory request of behavioural data at team level remained unanswered. A significant bank was unable to reproduce data related to team climate, of the teams within its high integrity risk trading business. Furthermore, the supervisory request of a root cause analysis resulted in the bank analysing a number of incidents, but it did not result in the bank acquiring any insight in or deepened understanding of the way team climate facilitated the unethical behaviours, needed to prevent future misconduct. So, an external supervisor asking banks to focus on team climate is insufficiently effective.

If team climate is a blind spot for banks and their financial supervisors, and supervisory requests for team climate analysis are insufficiently effective in eliminating that blind spot, there is a logical next step: tools have to be provided to analyse team climate as an internal or external supervisor. I aimed to provide a practical approach to do so. With Study 3, I showed that it is possible to define team climate and characterize teams within the same organization on the three 'Corrupting Barrels' team climate aspects that facilitate unethical behaviour: ineffective error approach (relating to the 'Functional error approach' survey scale), outcome inequality (relating to the 'Fair rewards' and 'Just leadership' survey scales) and dysfunctional moral climate (relating to the 'Rule awareness' survey scale). By combining desk research, team observations, and interviews, it is possible to effectively define team climates, identify meaningful differences in team climate characteristics that are known precursors of organizational misbehavior. The Corrupting Barrels survey is a less labour intensive way to provide a first impression of team climate characteristics. The use of the survey for my analysis is a first attempt to get this impression and although my analysis shows that the survey can serve this purpose, it also revealed opportunities to develop the survey further in future research. The instrument can be perfected and its predictive value needs improvement. However, the first step in developing and conducting the survey is taken successfully. So, the data I presented from the deep dive review and survey attest to the validity of my analysis and suggests possible ways of taking up a practical approach in preventing misconduct by defining and assessing team climates.

1. Defining team climates: identify root causes of misconduct

Two-step approach

Based on my literature research and the different data sources examined and reported here, I propose to mitigate misconduct risk with a two-step approach (see Chapter 3). The first step, as I will explain further in this chapter, is to define team climate and identify root causes of misconduct. Based on my analysis, I suggest to further explore the use the Corrupting Barrels model and framework as a first step to analyse team climates in a structured and evidence based way.

The second step is that banks improve team climate on the back of that analysis, by targeting the team level root causes of misconduct. I propose to develop an active approach for targeting these root causes based on insights from social psychological theory and research on team climates to target team climate aspects that facilitate unethical behaviour, as I will discuss in paragraph 10.2.

Several officers and roles within banks are often involved when misconduct occurs. Next to the business and its leaders of the area where the misconduct occurs, legal departments or internal investigation units, human resources, compliance, risk management and internal audit usually are involved. Each play their own part in dealing with misconduct: leaders and staff within the business are responsible for (i.e. the first line of defense, in the three line of defense model) assessing and mitigating their misconduct risk. Risk management, compliance and HR challenge the business on their management of misconduct risk and support them in their prevention of misconduct (i.e. second line of defense). Internal audit is, as a third line of defense, in the position to reveal misconduct risk through audit reviews, and can escalate this to board level of the bank. Internal audit and the supervisor are, as internal and external supervisor, independent of the business and able to put root causes of misconduct in team climates on their agenda (in contrast to the second line of defense which tends to be more dependent on the overall business agenda for their impact on day-to-day practices). The internal and external supervisor are best placed to select the areas within a bank themselves to identify root causes of misconduct at team level, and both have a degree of power to force the business to improve team climates actively on the back of that identification. I argue that because of this independence and escalating and disciplinary powers, especially internal and external supervision can have significant impact on the prevention of future misconduct by using the assessment framework, especially in (areas within) banks that are unable or unwilling to address misconduct risk themselves. Internal audit and the supervisor are in a unique position to eliminate that blind spot for team climates within banks by revealing misconduct root causes within team climates, and to force banks to improve these team climates in order to mitigate misconduct risk.

The team climate perspective in examining misconduct offers a relatively new perspective for internal audit and financial supervisors (see Chapter 2, paragraph 2.2). As a senior supervisor of behaviour and culture in the banking industry at DNB and later as head of an internal audit team dedicated to identify behavioural risk, I argue that there are at least three important success factors for internal or external supervisors to embark upon team climate assessments effectively.

The first success factor is that team climates are assessed explicitly by a team that is dedicated to assess and mitigate these specific risks. When financial supervisors and internal audit groups commence with supervising behaviour and culture, they often debate on whether to assess behaviour and culture as a specific topic, and whether - in terms of organizational structure - a separate dedicated team on the topic is justified. Although behaviour and culture is part of any supervisory assessment, addressing and assessing behaviour and culture (including team climate) explicitly, gives a strong message to the supervised banks and business areas that the blind spot for this topic is creating risks that need to be mitigated. Positioning behaviour and culture audit and financial supervision as a specific risk area should therefore be more effective in mitigating risks related to behaviour and culture, than blending in this new perspective with more familiar (and for some more therefore comfortable) risk areas. A specific audit or supervisory team dedicated to behaviour and culture should help achieve this explicit positioning of behaviour and culture risks.

The second success-factor for effectively mitigating behaviour and culture risk is to resource this team with audit or supervisory professionals that have experience with assessing behaviour and culture, and have an expertise in this field. To define team climate and assess misconduct risk requires a structural method (such as the framework discussed in the next paragraph), and sound professional judgement built by that experience and underlying expertise. The expertise – an academic background in psychology for instance - adds to the credibility that is needed to land the messages effectively with the leaders that have to impact or change their businesses and the team climates within.

The final success-factor I highlight is to use a specific assessment approach, that often differs from other audit and supervisory assessment (more control oriented) approaches. To define team climate and its root causes of misconduct, it is important that internal and external supervisors assess reality within teams: what is the day to day reality for people in the team? What is their professional context and how do they perceive this context? It requires an interactive and realistic assessment, that cannot be fully captures with a standard checklist. To define team climate a combination of qualitative and quantitative instruments is most effective (Raaijmakers, 2015; p. 78 on triangulation in a supervisory approach).

The assessment framework

The assessment framework, that I used for my analysis reported in Chapter 9, offers an effective triangulated and structured approach to define team climate and identify root causes of misconduct. As presented in Chapter 9, the framework includes five instruments: a two- pager on the assessment framework, a list of documents that can be requested for desk research, an interview format, an observation format and a survey. The instruments as included in Appendices A t/m E offer a concrete example: these are the exact instruments as I have used in my analysis reported in Chapter 9, applied to the context of the banking trading business. However, they are not meant as a fixed or prescriptive method for all contexts: I do not present the instruments as definite and suitable for all. To embark upon defining team climates to identify misconduct risk, three underlying principles of the assessment framework presented are to be considered. First, the focus of the assessment should be at team level, second a combination of qualitative and quantitative instruments is needed, and third, it should aim to address indicators of the three categories of root causes as presented by the Corrupting Barrels model (ineffective error approach, outcome inequality and dysfunctional moral climates). By using an assessment approach in line with these three principles, team climate and its root causes for misconduct can be defined effectively.

2. Improving team climate: mitigate misconduct risk

Once a team climate is defined, the patterns within that team climate that could facilitate unethical behaviour can be identified. These patterns concern the error approach in the team, outcome inequality and the overall moral climate. These root cause categories can be improved by the bank with an active and targeted approach. Before I suggest improvements within these specific categories, I explain the importance of leadership in improving team climates.

2.1 Leadership is key

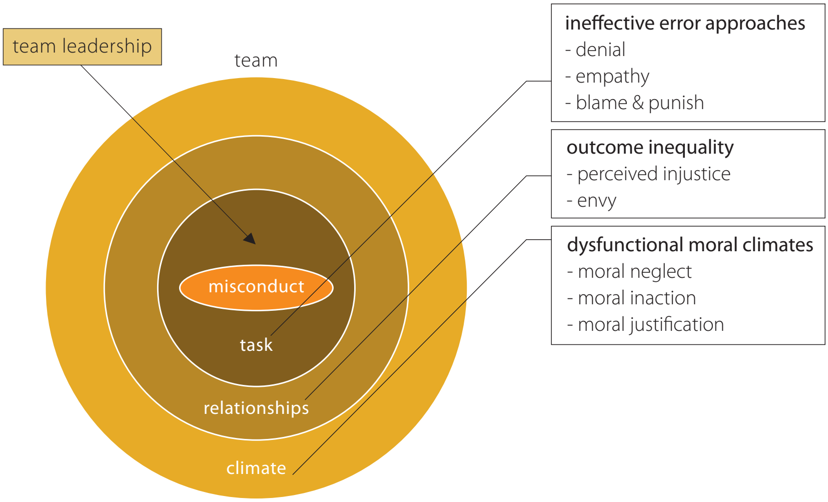
The common denominator of all improvements to team climates is leadership. Team leadership is an important lever in improving team climates and thereby mitigating misconduct risk. Team climates and leadership are interconnected, in fact, team leaders are in a way embodiments of the teams they lead (Haslam *et al.*, 2013). Haslam, Reicher and Platow (2013) have defined leadership as being the ingroup champions, who help shape and reaffirm social collective norms in the group. According to their social identity approach to leadership, heads of trading desks live the values of their teams and thus make them reality.

Team leaders impact team climate in all facets, through their actions, inactions and choices (see Figure 10.1). Dysfunctional team climates, facilitating unethical behaviour, are not only caused by ineffective leadership. I argue however that failing leadership is an important risk factor and can frustrate and lead astray even the best and most morally upright employees. This also implies that through effective leadership, team climates can be improved and misconduct risk can be mitigated.

To improve ineffective error approaches team leaders can stimulate open communication about errors and create a learning climate (Rybowiak *et al.*, 1999; Cannon & Edmondson, 2001).

Leaders can do this by openly talking about errors in the organization, including their own failures, and present these as a learning opportunity. Next to modelling desired behaviour, leaders can react to errors consciously and consistently in a way that minimizes concerns employees might have about consequences for their status in the team (Edmondson, 2003). Finally, an 'error management instruction' that explicitly encourages to make errors and emphasizes the positive information feedback of errors to enhance learning, has been shown to have positive effects on performance of people because they are more inclined to discuss and learn from their errors (Keith & Frese, 2008; Heimbeck *et al.*, 2003).

Figure 10.1. Leadership impact on team climates



For managing negative emotional consequences of outcome inequality, as perceived injustice and envy, team leadership is an important channel too. As the survey results showed, unfair leadership affects teams apart from the perceived fairness of reward distribution. The six desks assessed showed the largest variation on these two scales – 'Fair rewards' and 'Just leadership' – whilst all six desks are part of the same organization. This illustrates how team climates and team leadership influence these drivers of perceived injustice. Furthermore, leadership can reduce envy in the workplace (Duffy *et al.* 2008). When a team member envies another team mate, a counter managerial perspective clarifying that the envious team member is behaving 'bad and unprofessional' can be effective (Tripp & Bies, 2007). If inequality within a team elicits perceived unfairness, sensitivity in interpersonal treatment of the team leader helps team members to cope better with the inequality (Tyles & Bies, 1990). Team leadership is an effective lever to improve dysfunctional moral team climates. Moral exemplars in leadership roles have a positive effect on moral team climate (Mayer *et al.*, 2012; Moore & Gino, 2013). Research on ethical leadership (Brown *et al.*, 2005) shows that next to role modelling, team leaders can promote moral behaviour through two-way communication, reinforcement and decision making.

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To activate leadership as a key lever in improving team climates, banks and financial supervisors need to hold leadership accountable for healthy team climates and review to what extent senior leaders have assessed team climates with this objective. Has senior leadership a clear picture of which teams within their banking organization have increased misconduct risk? This includes inherent misconduct risk - based for instance on the nature of their business and clients and (recent) changes within their business or organizational context – and misconduct risk that comes forth from dysfunctional team climates. Did senior leaders ensure that they receive the behavioural signals and data needed for them to make that risk assessment at team level? And, to what extent has senior leadership acted to improve leadership where it is needed? From my own personal experience as an (external) supervisor, (senior) leaders often have some idea about the leadership quality within their scope, but underestimate the risk of certain leadership behaviours. I have encountered in my supervisory and audit work many dysfunctional team climates – since I work risk-based and focus on the places within banks that need improvement most – and often discussed my findings with senior leaders. I observed that on the one hand they acknowledged the accuracy of my findings, but on the other hand had to be 'educated' about the risks these indicated and needed to be actively convinced to act upon these findings.

- *An illustrative example from supervisory practice (Nr. 18, see Table 2.1)*

The results of the team climate assessment of desks A and B as reported in Chapter 10 – using desk research, team observations, interviews and the survey – was disclosed to and discussed with middle and senior management. Desks A and B both had a desk leader; who reported to the middle manager. The middle manager reported to the senior manager. First a 1,5 hour meeting with the middle manager was organized to discuss the assessment findings, and two days later a 1,5 hour meeting with the senior manager accompanied by the middle manager was organized to do the same. A slide deck with the main results was used to facilitate the dialogue. During these meetings, the middle manager and senior manager recognised and acknowledged the assessed team climates and the identified patterns that facilitate unethical behaviour. They recognised the identified patterns, but had underestimated the risks of these team climates. An example is the senior manager calling the desk head of desk A, who clearly displayed a dysfunctional leadership style, a "high potential leader" who only needed some coaching to work on his 'relationship management'. The assessment results however indicate a dysfunctional leadership style, which should make the desk head 'low potential' for a higher management position – especially in a high integrity risk team that deals with such large transactions. This conclusion was accepted by senior management after it had been explained. Subsequently, financial supervision discussed with senior management the steps they were required to take to improve the risky patterns that were identified.

Courageous leadership is needed for team climate improvements to succeed, in which team leadership, middle and senior management are aligned. Senior management should have the courage to support leadership changes that are needed to achieve team climate improvements, even if the financial performance of the teams and leaders is excellent. Avoiding to change dysfunctional leadership, and allowing that team members are exposed to failing guidance, invites the recurrence of misconduct within banking.

2.2 Improve the 'Corrupting Barrel' team climate characteristics

Below, I discuss ways to improve the team climate characteristics that can facilitate unethical behaviour: ineffective error approach, outcome inequality and dysfunctional moral climates.

Improve error approach

Leaders within banks can improve error approaches in teams, and herewith improve team climates and mitigate misconduct risk (Frese & Keith, 2015). This involves an increased awareness and deepened understanding by (senior) leaders of the variation in error approaches and their potential detrimental effects. Second, it requires an active approach to assess the current error approach in a team, and in line with the assessment findings, improve the way a team deals with errors. An explicit example of such an improvement is to target an ineffective error approach, by creating the possibility for 'blame-free' reporting of errors and constructively responding to such reports (Edmondson, 2003). This should help stimulate more open communication and create a learning climate (Rybowiak *et al.*, 1999; Cannon and Edmondson, 2001). Provisions can be made to facilitate the identification and analysis of errors (Raaijmakers, 2015; see Chapter 11 on error approaches that I wrote).

Prior research suggests that an effective way of facilitating the identification and analysis of errors is to combine technical and social provisions. This can be done, for instance, by building an information or registration system for errors (technical change), as well as investing in dialogue on errors (social change) (Cannon & Edmondson, 2005). Investing in technical solutions, for instance, by building better information systems, may seem most feasible as a first step. Nevertheless, to be effective such technical improvements need to be accompanied by social changes that induce feelings of safety and trust in employees allowing them to openly discuss conditions that may contribute to the occurrence of errors. Cannon and Edmondson (2005) recommend that organizations set aside space and time for relevant employees to evaluate errors as a team, and to hire or develop skilled facilitators to ensure a learning oriented dialogue is held during these meetings. Another suggestion is to invite employees with diverse backgrounds to attend these evaluations. Involving people with different views or types of expertise increases the quality of the discussion and strengthens the learning potential of the evaluation. In doing this, it is important to consider the fact that some errors are more easily discussed than others. Errors with severe consequences are more likely to be considered for formal evaluation or to be discussed informally. Nevertheless, openly discussing 'minor' errors may seems less threatening and can help the bank communicate the importance of considering all errors made, and conveys the willingness to learn from errors instead of denying them. Evaluations of errors should not only address the 'big ones'; routinely considering the learning potential of smaller errors contributes to the development of an error management culture (Sitkin, 1992; Homsma *et al.*, 2007).

Reduce outcome inequality

Another improvement of team climate in order to mitigate misconduct risk, is to reduce outcome inequality. This preventive step that could be taken by the banking industry, supported by its regulatory context, could entail to reduce income differences within teams and banking organizations (Vecchio, 2000). An inspiring example was given in 2015 by Dan Price, CEO of Gravity Payments (a credit card processing company). Price used his own income to raise the salary of his employees up to a minimum of 70.000 USD a year and hereby reduced the income inequality within Gravity Payments (Cohen, 2015). However, restructuring incentives seems to be a step banks do not easily take. A study by Boersma (2014) evidences this assumption. Boersma analysed developments in communications on remuneration and target structure of ING Bank, ABN AMRO Bank, Rabobank and SNS Bank. These four significant Dutch banks hold about 80% of total assets of the Dutch banking sector and therefore are representative of the sector in the Netherlands (Commissie Structuur Nederlandse Banken, 2013). The study showed that over the seven years that followed the start of the financial crisis in 2007, the way these banks publicly communicated about their remuneration structures did not show any changes. Their annual reports did not report changes in the development of significant compensation aspects such as the balance between financial and non-financial targets, the variable salary for the executive board and distribution of target criteria based on individual and/or group performance. Especially in those seven years after the start of the financial crisis, the societal disbelief and dissatisfaction with the banking sector called for a reconsideration of incentives within the sector. Nevertheless, Boersma showed that in their external communications, banks did not demonstrate sensitivity to their increased reputational risk regarding their remuneration. To prevent future misconduct it is however essential that banks are willing to reconsider their performance management and incentive schemes (Bies & Tripp, 2001). An alternative for setting quantitative performance and connecting bonuses to obtaining these goals, is to make teams responsible for reaching set performance objectives. Let teams figure out how they will reach these objectives, by doing the right thing and making use of different roles and capabilities within the team. Banks will have to attend to procedures and leadership interactions as these can drive perceived injustice (measures by the 'Fair rewards and 'Just leadership' survey scales).

... and manage its emotional consequences

Next to reducing actual outcome inequality, managing the emotional consequences of inequality improves team climates in a way that prevents future misconduct. Banking leaders could start as of today to reduce the negative emotional consequences of outcome inequality. Emotional consequences such as perceived injustice and envy can be managed in a way that mitigates the risk of these emotions resulting in unethical behaviour. Managing these emotional consequences effectively by treating staff fairly ('Just leadership') requires first an increased awareness and deepened understanding by (senior) leaders of antecedents of these emotions and their possible detrimental effects. In the banking industry, performance management and reward allocation are assumed to increase motivation and overall performance. These systems could however result in outcome inequality with emotional consequences that can drive unethical behaviour. Seemingly the banking industry assumes that the motivational benefits of reward allocation outweigh the emotional burden of unequal outcomes in performance management and reward allocation. Recent costly misconduct cases (such as the Wells Fargo case) call for a fundamental discussion on how staff performance and motivation is best driven, and suggest the industry revisits its incentive assumptions.

Preventing future misconduct driven by outcome inequality requires an active approach to assess the emotional consequences of inequality within a team and improve fairness of leadership and the way emotional consequences are managed by the team-leader, the team itself and the individual team members. An explicit example of such an improvement is to inform employees of likely outcomes and adhere to fair procedures. In this way, employees feel that they are treated respectfully even when their outcomes are less favourable than those of others (Duffy *et al.*, 2008; Cohen-Charash & Mueller, 2007). Another way to reduce negative emotional consequences of inequality within a team is to increase team identifications (Duffy *et al.*, 2012). This way, team undermining norms are decreased.

Improve moral team climate

Improving dysfunctional moral climates within teams to mitigate misconduct risk requires first an increased awareness and deepened understanding by (senior) leaders of these moral climates, their drivers and their possible detrimental effects on ethical behaviour. External supervisors who know about these risks, or internal supervisors who have been trained to identify such risks can plan an important role in this process of raising this awareness amongst senior management.

Second, it requires an active approach to assess the moral climate within a team, and in line with the assessment findings, improve these moral climates. A tangible example of an activity to dampen moral neglect is to heighten one's sense of moral self-regard within a team (Moore & Gino, 2013). This can be done with certain prompts that can be woven into the professional daily context. Desai (2011) showed that team members behave more ethically after exposure to a morally relevant quote as part of an email signature. Another active approach to improve climates of moral neglect and moral justification is to explicitly invite teams and their members to consider the moral content of their business. Climates of moral neglect and moral justification can be challenged by creating dialogue on this moral content during team meetings, or including explicit moral messages in leadership communication.

Also, to impair moral justification within teams, Moore and Gino (2013) suggest to expand one's circle of moral regard. Unethical behaviour can be facilitated by a narrow circle of moral regard, for instance putting one's own family and direct colleagues first. This narrow circle of moral regard can be enhanced by a caring climate where each other's wellbeing are of the greatest concern to the team (Simha & Cullen, 2012). Caring climates have been established in prior research as climates that can counter the adherence to moral principles, and can invite organizational misbehavior, even among workers who are aware of organizational rules and guidelines. For instance, team members in a caring climate can be tempted to cover up each other's poor behaviour, eventhough this poor behaviour is breaking rules. By inviting team members to consider customers and clients as part of their circle of moral regard, through framing and communication by team leadership for instance, justifying immoral actions towards them is less likely (Laham, 2009).

A climate of moral inaction can be improved by taking seriously any comments thus raised, and reconsidering existing business practices accordingly. Here positive management framing can be effective, where the team members that took action in case of observing immorality are rewarded and their behaviour is rewarded as being 'good and professional'.

2.3 Conflicts to resolve

I argue that there are three areas of conflict that are likely to emerge when banks work on improving team climates, and require a bank to think through these areas and take a stance or choose what its priorities are.

The first area of conflict concerns the contradiction between a strong control environment and an openness about errors. Say, hypothetically, that a bank employee is checked on the completeness and quality of the forms (s)he fills in to do a transaction or serve a customer. And that the outcome of this control step influences his performance review. The employee will, to protect her/his good performance, be less open about a mistake that might hav been made in an environment where the emphasis is on controls. At the same time we know that lack of openness about errors facilitates future unethical behaviours. To check up on people's actions, often stimulated by financial supervision, is a strategy many banks take with the aim to control behaviour of their employees (see Chapter 3 on common responses of the banking industry to misconduct). This controlling strategy comes with a price: by a decreasing the likelihood that employees are open about errors, the risk of misconduct increases. And again, the imposition of (deterrence) sanctions generally undermines employee trust and reduces rule compliance (Mooijman *et al.* 2015). So, it is likely that trusting employees to do the right thing until proven otherwise, and only disciplining them when needed, is a strategy that is less costly than the controlling strategy.

A second area of conflict concerns the contradictions between performance and compliance goals. During a supervisory interview a trader indicated that he felt the bank communicated two contradicting expectations to him: to act ethically, and to make profit. He was in his mind not able to reconcile these two expectations. Regardless of whether this is possible in practice – making money by doing the right thing – he felt the goals he had to meet were not in line with each other. This perception – in being forced to prioritize performance over ethics or to sacrifice performance to behave ethically - influences his individual (ethical) behaviour and therefore creates misconduct risk. I often see management structures that strengthen perceptions like these, where a bank employee even has two different managers to report to: a 'performance' manager and a 'control and compliance' manager. Both these objectives only come together at the level of the bank employee at the front line, who has to make decisions that meet contradictory expectations from both managers. Leaving it up to the bank employee, who faces clients and customers, to marry up performance with compliance goals in his daily interactions and transactions makes it difficult to do what is required at all ties and invites unethical behaviour. Could it be that combining performance with compliance goals more explicitly resulting in integrated guidelines, instead of separating these objectives, is a strategy that is less costly in the long run?

A third area of conflict concerns the contradictions between a legal and a learning approach regarding misconduct that has taken place. As revealed in the responses that are common to banks in Chapter 3 – paragraph 3.2 – the legal paradigm prescribes containment in handling misconduct cases. However, the common practice of not sharing information on the cases also leaves colleagues in the dark about what happened exactly or prevents them from realizing why this was wrong. This impairs the ability of the bank to learn from prior experiences with misconduct cases. To prevent misconduct it is vital to be able to analyse the specific circumstances and aspects of such occurrences. Legally (especially when lawsuits are involved) it can be costly to admit that the organizational and team context had a part in the origins of the unethical behaviour. Could it be that owning up to that organizational accountability to be able to prevent next cases more effectively, is a strategy that is less costly in the long run?

I strongly believe that these contradictions need to be addressed when aiming to improve team climates. Senior leadership should be asked questions about these areas of conflict. Questions on how their disciplinary sanctions and containment strategy after misconduct occurred, take into account the necessity to learn from what happened. Questions on how their performance management is married up with compliance objectives. Questions on how increased controls are managed in a way that stimulates openness about honest mistakes. Questions like these raise the awareness with senior leadership on these relevant contradictions, and enable them to make more productive decisions in their preventive approach of misconduct.