



25 Simple Yet Overlooked Ways to Boost Your Ethics and Compliance Program

by Ed Petry, Vice President, Advisory Services

INTRODUCTION

Ever wished you could take some simple steps to increase your ethics and compliance program effectiveness that would pay dividends?

Whether your goal is to improve your organizational culture, get better connected with employees and colleagues or boost program awareness, there's an idea in this eBook you can put to work in your organization today.

If you do implement one or more of these ideas, we'd love to hear how it worked. Get in touch with us at any of the links below.



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- [Read Ed's Recent Blog Posts](#)
- [Connect with Ed on LinkedIn](#)



01

MAKE TIME FOR FACE TIME

There is no substitute for in-person conversations.

- While surveys and focus groups are important ways to gather information, they are no substitute for personal, one-on-one interactions.
- Nearly every experienced ethics officer will tell you that some of the best ideas and insights they ever gained were from casual conversations with colleagues, managers and frontline employees.
- Make the time to meet with people. Start with lunch—or even just coffee.

We've conducted hundreds of hours of focus groups and training with managers and frontline employees at organizations around the world as part of our culture assessments and in-person training engagements. Read our blog post [Three Ethics & Compliance Program Insights You Can't Afford to Miss](#) for distilled insights from those conversations.

INVITE PEOPLE TO SHARE THE UNVARNISHED TRUTH

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Find out what people really think of your program by asking them to share honest feedback.

Ask your peers in HR, legal and other departments—and your managers and front line employees—what they really think about your E&C program.

Use questions like:

- Which elements of the program or E&C communications are most effective—and which are most likely to be received with eye rolling or worse?
- What's been a home run, and what has missed the mark?
- What do they look forward to and what do they dread?

There are four things compliance officers often do, which inadvertently undermine program effectiveness. Find out what they are in our blog post [Cynicism, Fatigue and Compliance Pushback—A Problem We Can No Longer Ignore](#).



HELP BREAK DOWN ORGANIZATIONAL SILOS

03

Ask others what they need from you to help establish mutual support.

- What could you be doing to better support your HR team? Your legal team? Managers? Frontline employees? Your executive team? Your board?
- Ask how you can better support and serve their needs: the answers may surprise you and help you fine tune your program.

Making sure the compliance and HR teams are as closely aligned as they should be isn't easy. Get more practical ideas for working together in our blog post [Working With HR—Time to Try Again](#).

04

ASK THE RIGHT QUESTIONS TO ROOT OUT HIDDEN RISKS

Think outside the risk assessment to find the risks that really need to be on your radar.

- It's fairly easy to gather information and track progress against identified risk areas. The harder task is to identify what risks you've missed—or risks on the horizon.
- Asking managers and executives open-ended questions can help solve this problem. For example, don't ask: "What do you see as E&C risks in the coming year?" Do ask: "What keeps you up at night?"

Have you had an objective review of your program? Learn more about how an [E&C Risk Assessment](#) can help you get buy-in, better protect your organization and prioritize your efforts.

GIVE EMPLOYEES THE JUICY (ANONYMIZED) DETAILS

05

Publish anonymized, sanitized cases to capture employees' attention and make training more effective.

- When we ask employees in focus groups how compliance training could be improved, the number one answer is almost always “Use real cases from our company.”
- Anonymized cases from your organization drive the point home in ways other efforts cannot. They show employees that you take your policies seriously—and demonstrate organizational justice in action.
- Add anonymized cases to live training, manager discussions, or feature them in your company newsletters.

For more tips on using anonymized cases in your program—including overcoming possible objections from your legal team—see our blog post, [That Really Happened? Using Sanitized Cases to Make Ethics & Compliance Concepts Real.](#)



MIX IT UP

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Convey your E&C messages in a new and different way.

- It takes anywhere from five to 30 repetitions of information before a person can remember it at the time when it's needed.
- Be creative. Try using intranet sites, newsletters, emails, social media, in-house closed circuit televisions, blogs, even table tents in the cafeteria with case studies or "did you know" E&C facts.
- Don't overdo it, but a brief email to leadership with a link to a timely news article or blog can also be effective.



Fun Fact: Top performing programs use an average of 6.5 different communication channels to [raise ethics and compliance awareness.](#)

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MAKE A GOOD FIRST IMPRESSION

Are new employees getting the right E&C messages during onboarding with HR and with their managers? Find out.

- Compliance executives are often surprised at what is—and what is not—said during employee onboarding.
- Request to review the materials being used in the onboarding process and offer to help refine them.
- Consider designating someone from your department or a supportive manager to attend new hire onboarding meetings as the face of E&C and get them 10 minutes on the agenda.

Managers need support from E&C in all aspects of managing their team: hiring, onboarding, performance management and maintaining team culture. Help them out with E&C content you can cut and paste into your communications with managers: [subscribe to our free newsletter, Compliance Communicator](#).

CREATE A BRAND

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Branding your E&C program can make it more memorable.

- E&C communications can often get lost in the blur of corporate communications.
- Consider developing an E&C brand or logo to identify all of your team's activities.
- Start by asking your marketing department for help in developing something memorable that fits in with your organization's branding guidelines.

NAVEX Global's code of conduct is an example of a great partnership with our marketing team to create a memorable, user-friendly code. [See it for yourself.](#)

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GET YOUR CEO INVOLVED

CEOs sharing their commitment to E&C goes a long way.

- Have your CEO send a note about the importance of E&C to your employees.
- Keep the message brief, and make it timely. Consider using a recent issue in the news as the “hook.”
- Use whatever platform is most likely to be read—a company newsletter, your CEO’s quarterly email to employees, or your intranet or internal blog.

For more ideas on engaging the C-suite, see our blog post, [Two Essential Requirements for Tone at the Top](#).



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RETHINK YOUR NEXT E&C EMAIL

Avoid compliance fatigue: make your messages count.

- While mixing it up and using multiple channels to improve awareness is encouraged, know when enough is enough.
- This especially applies to emails. The more emails employees receive from your office, the higher the probability they will be ignored.
- Before you hit the “send” button ask yourself if everyone on the distribution list really needs to receive your latest email communication. Reducing the number of communications makes the ones you do send all the more powerful.

Worried your E&C communications are missing the mark? Get tips on delivering the right messages to the right people at the right time in our blog post [Failure to Plan is Planning to Fail: Keys To Raising Employee Awareness of Ethics & Compliance Programs](#).

DEVELOP A MULTI-YEAR TRAINING PLAN

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This planning step alone can be extremely powerful for improving education relevancy and efficiency.

- A multi-year training plan (sometimes called a curriculum map) lays out who needs what training and when, including periodic, short, awareness communications.
- Creating and executing a plan means you're more likely to cover all your key risks—and improve training's relevance and efficiency.

Access our on-demand webinar, [How to Create a Multiyear Compliance Training & Communications Plan in 7 Easy Steps](#), to get more expert advice and free templates you can use to create your own plan.



SCRUTINIZE YOUR TRAINING CALENDAR

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Make sure you're making the most of each learners' time—and avoiding training fatigue.

Ask yourself:

- Do I really need to have everyone take code of conduct training every year?
- Can some of my annual training focus only on changes that have been made in the last year?
- Can I replace some full-length training with short formats or simpler, more targeted awareness communications?

Our E&C Training Benchmark Report helps you understand whether your approach to training is in line with your peers and best practices. [Get your copy and see how you're doing.](#)

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MATCH TRAINING TO ROLE-BASED RISKS

Deploy risk or role-based training to increase training relevancy and reduce time off-task.

- Require training on the basis of identified risks to make it more relevant and timely.
- For instance, it's possible that not everyone in your organization needs an anti-corruption and bribery update, but managers who are about to be rotated overseas certainly do.
- Most importantly, senior leader and board director groups should each receive training that is targeted to their unique—and different—roles and responsibilities.

Board training can be tricky, but it's critical. Get best practices in our blog post [Don't Bore Your Board: Seven Tips for Delivering an Engaging Ethics & Compliance Board Training Experience](#).

GET OUT YOUR RED PEN

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Training and related communications are best when the messages are short and to the point.

- If you're too close to the content of the training you're delivering or have "pride of ownership," turn it over to a colleague you trust to cut it down to size.
- Studies show that for adult learners, attention tends to wane after 15-20 minutes. As an added bonus, short training sessions are often much easier to schedule.
- Microlearning (also known as burst learning) can be a great option for targeted training.

Want ideas on how to cover more training topics in less time? Take a look at our eBook, [Burst Learning User Guide](#).

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GET MANAGERS INVOLVED IN TRAINING THEIR TEAMS

Employees are most responsive to information that comes directly from their manager.

- Unfortunately managers often don't have the time or they feel they lack the expertise to deliver E&C education.
- Develop 10 -15 minute, easy-to-deliver training segments managers can fit into an upcoming staff meeting. Keep it simple.
- If practical, join their presentation: often what managers fear most is the prospect of a question that they can't answer.

Tone in the middle is essential. See four steps managers can take to help their staff make ethical decisions in this recent edition of our [monthly newsletter Compliance Communicator](#).



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RAISE YOUR HAND ON CYBER SECURITY

One of your best defenses against a cyber attack is your employees.

- Your IT team might be able to keep your networks safe around the clock. But it can't stop your sales director from opening spam that introduces ransomware onto your network.
- The most common source of a security breach is human error. That means compliance officers have a unique role to play in making sure employees are trained on their role in protecting your organization.

For ideas on how best to train employees on cyber security risk, check out our blog post [Seven Training Imperatives to Address Your Biggest Cyber Security Risk: Employee Behavior](#).

OFFER THIRD PARTIES YOUR HELP

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When third party business partners have effective E&C programs, everyone wins.

Help smaller business partners that may not currently have strong E&C programs. Let them know you and your team are available to answer questions about an effective E&C program.

You could also...

- Host informational calls or meetings to get them up to speed on best practices
- Encourage them to use your code of conduct as a basis for creating their own
- Assist them in developing or accessing relevant training and other E&C resources

Our white paper, [Creating a Culture of Ethics, Integrity & Compliance: Seven Steps to Success](#) is a good resource for understanding the fundamentals of a strong E&C program. Share it with your third parties to open up a conversation.



SPOT-CHECK HIGH RISK THIRD PARTIES

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Non-traditional approaches to third party audits can help create a more risk-aligned third party risk management program.

- Many compliance officers include third party audit rights in contracts with third party intermediaries.
- Work with internal auditors to assign types of “audits” to your third party population based on a risk-ranking formula.
- Beyond the traditional financial audit, E&C officers can do, phone audits to verify key information, transaction testing or spot checks.

For more details on this approach, see our blog post from third party risk expert Michael Volkov, [Implementing an Effective Third Party “Audit” Program](#).

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DEMYSTIFY THE HOTLINE REPORTING PROCESS

Explain—in detail—what happens when an employee calls your hotline or makes a web report to share a question or concern.

- Employees who know what to expect are more likely to report. It pays dividends to make sure that employees know exactly what they need to do.
- Stress the importance of anonymous reporters following up on their reports in case investigators have questions or need more information.

Download our [2016 Hotline Benchmark Report](#) to see industry medians on anonymous report follow-up rates—and how your program's rates stack up.

CALL YOUR OWN HOTLINE

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Calling your helpline and/or your main line provides valuable firsthand understanding of what your reporters experience when they call.

- If you use a third-party for your helpline, call it and file an anonymous report. Make sure your calls are being handled appropriately, and the case is properly routed through the system.
- You might also call your organization's switchboard and tell them that you have an ethics issue you'd like to discuss. Find out if such calls are routinely directed to your office—and whether employees have an easy and direct way to reach you.

Hear Carrie Penman, NAVEX Global's CCO talk about demystifying your reporting process in our webinar, [Benchmarking Your Hotline in 2016: What is Your Data Telling You?](#).

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GIVE YOUR BOARD REPORT A MAKEOVER

E&C reports packed with too much information won't help build your program's credibility. In fact, they may have the opposite effect.

- Include only the most crucial, relevant content in board reports.
- Ideally, structure reports around guidelines such as the FSGO or OECD to help the report align with the board's oversight obligations.
- Looks count: reports that have a professional look and feel carry more weight than a report that is poorly organized and designed.

Get detailed, step-by-step advice for building a better board report in our whitepaper [Five Key Elements for Effective Compliance Program Board Reporting](#).



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TRIM YOUR CODE CERTIFICATION PROCESS

Be mindful of how the code of conduct certification process impacts employee perceptions of the ethics office, and adjust if possible.

- The annual code certification process and the increasingly demanding follow-up emails is often what shapes employee opinion of your office—and not always in a positive way.
- Consider whether the process can be streamlined and made less intrusive.

Training on your code of conduct should be some of the most high-quality, high-impact training you do. Make it count. [Watch clips of our newly revamped Code of Conduct eLearning course.](#)

CREATE AN E&C DOCUMENT LIBRARY

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A standard, up-to-date list of key E&C documents and processes can save time and mitigate risk.

- Create a checklist of standard E&C documents, then organize and file them in a centralized repository—policy management software, an intranet page or a shared drive.
- Your documents should be easy to access and find in case of legal action, for program effectiveness reviews and for efficiency.
- Also ensure that policies and procedures that govern your work are in writing and have been reviewed and approved.

Having a centralized place to store all of your critical E&C documents—including policies—cuts the hassle in half. See if a policy management system is right for you: [Get a demo](#).



MAKE A PLAN FOR KEEPING UP WITH CHANGE

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Policies should reflect real-time business conditions—the way your people work, the gear they use, and the latest regulatory changes.

- Of course, this is anything but easy.
- Keep a checklist handy (and customize it for your organization). If any of these “trigger events” occur, you may need to make updates to policies:
 - ✓ Operational or business structure changes, including mergers and acquisitions
 - ✓ Leadership or business partner changes
 - ✓ Cultural trends that impact employee behavior at work

See our related blog post for more in-depth insights on this topic: [5 Questions to Ensure Your Policies Keep Up With the Pace of Change.](#)

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LOOK BEYOND TRADITIONAL PROGRAM BOUNDARIES

Some organizational risks may not fall squarely in your E&C comfort zone, but have compliance and reputational repercussions nonetheless.

- Cyber security, mergers and acquisitions, product development and customer privacy—and even senior leaders' private lives—all have significant E&C or reputational risks.
- At the very least it's important for you to determine if someone in your organization is on top of these risk areas and confirm that related E&C issues have been identified and addressed.

This trend of pushing the boundaries was included in our [Top Ten Predictions & Recommendations for 2016](#) whitepaper. Download it to see what else we anticipate will be in store for E&C managers this year.

ADDITIONAL RESOURCES

- **NAVEX GLOBAL'S BLOG ETHICS & COMPLIANCE MATTERS™**
Visit & Subscribe: navexglobal.com/blog
- **FREE CONTENT FOR ENGAGING MIDDLE MANAGERS IN OUR MONTHLY NEWSLETTER**
Subscribe to our Compliance Communicator newsletter: navexglobal.com/comcom
- **NAVEX GLOBAL'S RESOURCE CENTER**
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NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organizations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world.