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

by Ed Petry, Vice President, NAVEX Global
Introduction

There are steps every ethics and compliance program manager can take to improve the effectiveness and efficiency of their efforts.

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.
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.

According to our Training Benchmark Report, 70 percent of respondents said “creating a culture of ethics and respect” was one of their top objectives.

More Detail: [Creating a Culture of Ethics and Respect: It’s all about Who You Are and Who You Want to Be](#)
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 frontline 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?

Asking the right questions returns the candid, honest answers you need to make precise improvements to your compliance program.

More Detail: Is Your Compliance Program Asking the Right Questions?
Help Break Down Organizational Silos

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

Organizational intelligence is a skill that connects the dots between Compliance and the rest of an organization.

More Detail: Unique Roles, Unique Challenges & Opportunities
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?”

There are eight essential components of an effective compliance program assessment. And they all need to be assessed.

More Detail: Definitive Guide to Compliance Program Assessment
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

Real-life stories that are relevant to employees’ jobs can be more effective teaching tools than traditional slides with bullet points.

Convey your E&C message 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.

Top performing programs use an average of 6.5 different communications channels to raise ethics and compliance awareness.

More Detail: Explore Awareness Solutions that Drive Commitment to Compliance
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

To make the best first impressions, you must understand your audience.

**More Detail:** [A Formal Introduction to the Five Generations of Employees in Your Workforce](#)
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

Unfortunately, in many organizations, the ethics and compliance department is viewed as “the people who say no.”

More Detail: Being the “Necessary Evil” Is so Last Year: It’s Time for Ethics & Compliance to Rebrand Itself
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.

How your CEO views culture, and how employees view your CEO plays a quantifiable role toward your bottom line.

More Detail: [Character from the Top: An Interview with Fred Kiel](#)
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.

Awareness is more than an email or poster in the break room.

More Detail: Custom Awareness Sample Materials
Develop a Multiyear Training Plan

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

- A multiyear 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.

There are seven steps to an effective multiyear training plan.

More Detail: [Editable Multiyear Training Plan Template](#)
12

Scrutinize Your Training Calendar

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?

Minimizing seat time and maximizing engagement is key to compliance training effectiveness.

More Detail: [Definitive Guide to Ethics & Compliance Training](#)
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.

In our Training Benchmark Report, 19 percent of respondents said training was “not seen as relevant or useful.”

More Detail: Are You Measuring Your Training Effectiveness...Effectively?
Get Out Your Red Pen

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.

- Micro learning can be a great option for targeted training.

Less can mean more when it comes to training content and communications.

More Detail: [11 Creative Ways to Incorporate Micro Learning into Your Compliance Program](#)
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

Our 2017 Ethics & Compliance Training Program revealed that training goals don’t always align with training program priorities, like training managers.

More Detail: [2017 Ethics & Compliance Training Benchmark Report](#)
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.

Cyber security is a people, process and technology issue that requires a cross-departmental approach involving an entire organization.

More Detail: [Real Answers to Common Questions on Cyber Security](#)
Offer Third Parties Your Help

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

Third-party management cannot just be seen as a contingency plan for potential litigation, but as a value add for working with good business partners.

More Detail: If Things Have to Be Risky for Your Third-Party Risk Management Program to be Valuable, You’re Doing It Wrong
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.

Third-party management and due diligence requires a risk-based strategy.

More Detail: Definitive Guide to Third-Party Risk Management
Demistify 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.

Understanding what employee whistleblowing metrics mean for your compliance program is a necessary step to evaluate and improve your efforts.

More Detail: [2017 Hotline & Incident Management Benchmark Report](#)
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.

Your hotline is an essential part of an effective multi-channel incident reporting management system.

More Detail: Definitive Guide to Incident Management
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

Making reports that are engaging and memorable is part of gaining the support and resources needed to make a compliance program more effective.

More Detail: Key Elements for Effective Compliance Program Board Reporting
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.

Your code of conduct is the foundational document of your ethics and compliance program. It should be clear, relatable and tailored to your industry and demographics.

More Detail: Make Your Code of Conduct a Defining Document, not a Formality
Create an E&C Document Library

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
- Ensure that policies and procedures that govern your work are in writing and have been reviewed and approved

Policy development efforts need to be prioritized to reduce unnecessary risk, support organizational values and address regulatory obligations.

More Detail: [20 Questions to Ask when Prioritizing Your Policy Development Efforts](#)
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 such as:
  - Operational or business structure changes, including mergers and acquisitions
  - Leadership or business partner changes
  - Cultural trends that impact employee behavior at work

There are four stages in the policy management life cycle: research and create; review and approve; distribute and train; and track and update.

More Detail: [Definitive Guide to Policy & Procedure Management](#)
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

Get more simple steps in your inbox weekly.

More Detail: Subscribe to the Ethics & Compliance Matters Blog
Additional Resources

- **NAVEX Global’s Blog, Ethics & Compliance Matters™**
  Visit and Subscribe: navexglobal.com/blog

- **NAVEX Global’s Resource Center**
  Find white papers, eBooks, webinars and more: navexglobal.com/resources

- **Let’s Talk about Your Program**
  Consult with us, schedule product demos, or get ideas for tackling your biggest program challenges. Get in touch by email at info@navexglobal.com or by phone: +1 (866) 297 0224 (Americas) or +44 (0) 20 8939 1650 (EMEA + APAC)
ABOUT NAVEX GLOBAL

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.

+1 866 297 0224  info@navexglobal.com  www.navexglobal.com

© 2017 NAVEX GLOBAL. ALL RIGHTS RESERVED.  09.06.17