



1

A woman in a patterned shirt and dark pants stands in a meeting room, gesturing. The background features a large window with a city view. The text 'In This Section' is centered above a bulleted list of topics. At the bottom right, there are logos for SCCE (Society of Corporate Compliance and Ethics) and HCCA (Health Care Compliance Association).

In This Section

- Why “Tone at the Middle” matters
- Benefits and challenges of manager-led communications
- The “one small step” approach
- Case studies: successful initiatives
- Other “on the job” communications

SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

2

Why “Tone at the Middle” Matters

“Tone at the top” is an essential to building an effective compliance and ethics program and culture.



But... does the message match what employees are hearing in their work environment every day?



3

What Do We Mean By “Tone”?



4

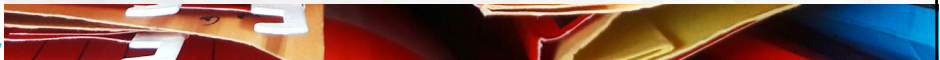
What Do We Mean By “Tone”?

- Tone = Culture (group norms; the way things are done around here)
- Common terms used to frame “culture”:
 - Ethical
 - Conduct
 - Integrity
 - Compliance
 - Custom
 - Openness
 - Safety
 - Accountability
 - Quality
 - Leadership
 - Innovation
 - Results
 - Performance
- Don’t confuse “culture” with “values”



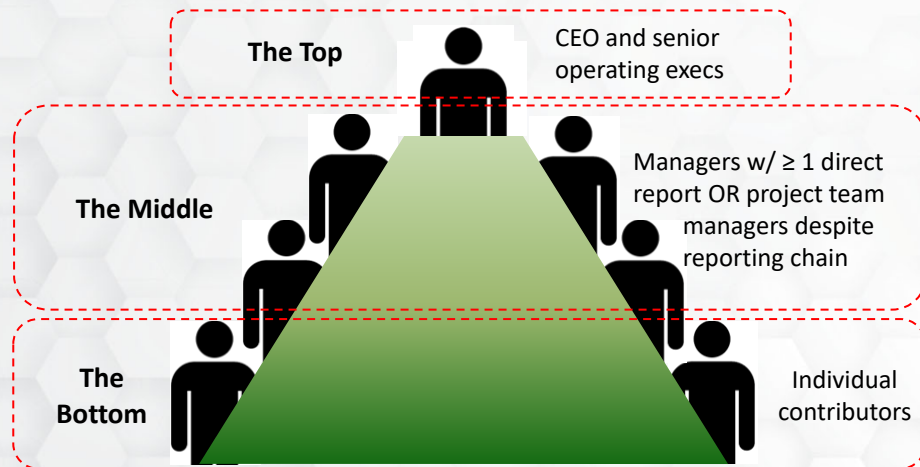
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What Do We Mean By “Middle”



6

What Do We Mean By “Middle”



7

Managers Set the Tone for Employees

Managers can...

- Serve as “sentinels” by helping to spot and address risk

OR

- Completely undercut your compliance message



8

Engaging Managers Has a Huge Upside

- Engaged managers extend the reach and credibility of your program
- Managers on the front lines can spot — or prevent — business risk
- Can build or reinforce concept that business unit owns compliance (and compliance is here to support)
- Empowering managers = professional development (better managers, better company)



9

There Are Also Many Challenges

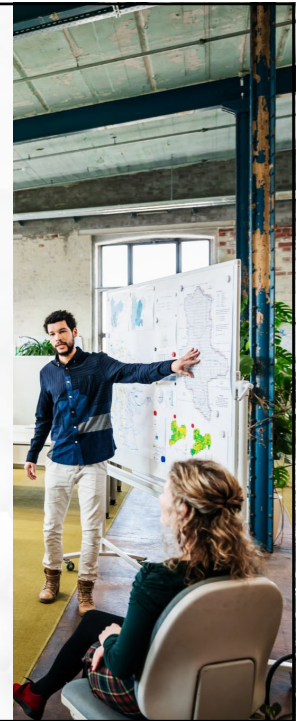
- Cultural inertia (change is hard)
- “Not my job” (“Compliance owns risk!”)
 - Focused on business goals — compliance seems like a distraction
- Don’t feel equipped or see opportunities to deliver compliance or ethics messages
- Requires trust and careful thought: Can’t fully control message



10

Tips For Cultivating Manager Support

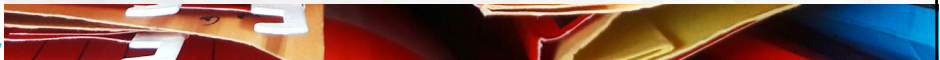
- “People support what they create” — take input
- Keep it simple—provide step-by-step
- Can they own something you would do?
- Keep educating/reinforcing business ownership of risk
- Leverage existing management development programs
- Show trust and support for manager actions



11

Example Initiative: Manager Talking Points

- Benefits of this approach:
 - Doesn't take time away from work (include in regular meetings)
 - Positions manager as voice of compliance/ethics
 - Can tailor message to very specific team realities
 - Can be standalone or a follow-up on previous training on the topic
- What this does best:
 - Give a general culture message
 - Address topics most likely to be brought to managers (respect, COI, speak up.)
- What it's less good for:
 - Technical or complex topics where the manager is not an expert
 - Proof of training or completions, if audit trail is required
- Works best when you make it easy



12

Case Study 1: Build Speak Up Culture

- **Issue:** Global heavy industry company with specific goal: address and improve Speak Up awareness (& reduce Dodd Frank reporting risk)
- **Solution:** Workshops for functional areas, manager-led training.
- **Program:**
 - Live 2-hr Dodd Frank training for HR leaders, worldwide meeting
 - Specific Speak Up training for managers, Dodd Frank context
 - Manager-led Speak Up training for employees



13

Case Study 2: Help Managers Voice Compliance Topics

- **Issue:** Global manufacturing company wanted to encourage manager/peer discussions of C&E topics.
- **Solution:** Developed “meeting in a box” materials that were easy to find, download, and implement.
- **Program:**
 - 70+% participation in a voluntary program—in 20+ languages worldwide
 - **Outcome:** Ongoing, quarterly manager messages to employees on C&E-related issues



14

Case Study 3: Revitalize Training Program

- **Issue:** Global consumer goods company worried that online training had gotten rote or stale.
- **Solution:** Created live training packages with activities, discussion, etc.
- **Program:**
 - Created live training packages in six core risk areas
 - Training started with CEO, who held sessions for direct reports
 - Those people trained their direct reports, cascading training through the entire organization



15

The “One Small Step” Approach

“I’ve studied human behavior for 20 years, mostly at Stanford University... Only three things will change behavior in the long term:

- Option A: Have an epiphany
- Option B: Change your environment (what surrounds you)
- Option C: Take baby steps

Creating an epiphany is difficult. Rule out Option A unless you have mystical powers (I don’t).

But here’s the good news: The other two options are practical. And they can lead to lasting change.”

—B.J. Fogg



16

On-the-job Communications

- Visual reminders can have a big impact — physical OR virtual
 - Think billboards and magazine ads—a small amount of info goes a long way
 - You can't help see them (high impression count)
- Reinforce existing training or send new messages
 - Posters and other visual displays are good in a manufacturing or offline environment ("Big board")
 - Can supplement (or not) with manager talking points
 - Virtual options include backgrounds, screensavers, etc.
- Make visuals work for you
 - Strongest = visualized information, not just communicating via words
 - Use: Icons, infographics, flowcharts, decision trees

Month 00 - 20xx
SCCE HCCA

