Do as I Say, but... Not as I Say.

The Importance of Consistent Compliance Messaging Across the Organization.

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Who am I?

- Kyle Lewis
  ◦ American / Canadian, living in Switzerland

- Compliance Operations Manager, LafargeHolcim
  ◦ Based in the group headquarters in Zürich, Switzerland
  ◦ Responsible for Tools, Processes, Training, Communications, and Analytics/Reporting

- Previous Experience
  ◦ Regional Communications
  ◦ International Marketing
  ◦ Baseball Player/ Coach
What will we cover in this session?

- Baseline: How do you communicate?
- Why you should care about what people are saying
  - Importance of consistency
  - Dangers & Pitfalls
- What to look for and where to look
  - Strategies & Tips
- Who can help
  - Where to look for additional support in your organization

High Five
What do you want from this session?

- Examples?
- Ideas?
- Motivation?
- Understanding?

Do you communicate?

- Launch / Update of Code of Conduct
- Launch / Update of Policies & Directives
- Yearly / Mandatory Training
- Whistleblowing hotline
- Compliance personnel changes
- Intranet page
- Alert statistics and lessons learned
You should care about what people are saying...

- Honesty is (usually) the best policy.
- Repetition, Repetition, Repetition.
- Consistent Tone from the Top and Reinforcement from the Middle is Paramount!
- What do regular employees think?

Words are not just words...

- CEO in Code of Conduct Introduction: “We put integrity at the center of everything we do.”
- Same CEO in email to Sales heads: “You need to get results. I will not accept excuses!”
Other Pitfalls to watch out for:

- Promising too much...
- Not aligning with management...
- Forgetting the middle...
- Not being able to measure success...

“When you can measure what you are speaking about, and express it in numbers, you know something about it; but when you cannot measure it, when you cannot express it in numbers, your knowledge is of a meager and unsatisfactory kind; it may be the beginning of knowledge, but you have scarcely in your thoughts advanced to the stage of science.” – Lord Kelvin
How do you measure compliance communications?

› Get a baseline

› Set clear objectives & report on them

› Ask your employees

› REPEAT

Get a baseline: Status Quo vs Expectations

› What is currently being communicated?

› Who is doing it? Or who should be?

› How often are there compliance focused communication? / How often is compliance included?

› Is well received? / Is it consistent?

› What does management want / expect?
Clear KPIs: What does success look like?

- What are you trying to achieve?
  - More engagement / awareness / speak up culture?
- Align your goals with the business objectives
  - What benefits will increased comms have on the organization?
- Effective communication has four basic KPIs:
  - Reach: How many employees are you reaching?
  - Engagement: How are employees interacting with the content?
  - Behavior: Are employees doing something differently?
  - Impact: On employee engagement, retention, and if possible performance and productivity
- Track your KPIs regularly!

Ask your employees!!!

- Surveys are important for setting KPIs as well as for measuring results.
  - Don’t discount in-person discussions
  - Focus groups
  - Silent influencers!
- Surveys can also be used to gather quantitative feedback on your content.
- Make your surveys worthwhile.
Take away: Consistency & KPIs

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What to look for and where to look

» Do some investigating!

» Take the time to review management communications
  ◦ Officials comms
  ◦ Messages to top management
  ◦ External communications by top management
  ◦ Meetings and events
  ◦ Videos

» Is the messaging consistent?

» Is it correct? / Any red flags?
Who can help? Find allies and partners!

- Communications (internal / external)
- Human Resources
- Health & Safety
- Management

Communications

- Integrate your messages:
  - What do they already communicate?
    - Room in the monthly / quarterly newsletter?
    - CEO Messages / videos
    - Senior Management calls and meetings
      - Space for compliance in messages and slots in the meeting

- Aim to tweak
  - Look for messages that are close to what you want to say
    - Don’t start from scratch, expand and clarify the messages with compliance in mind
    - Be authentic to the speaker’s voice
Human Resources

- Individual KPIs
  - Can compliance be included in the individual goals?
  - What are the current incentives?
    - Do they contradict compliance messaging?

- Employee Onboarding
  - Is compliance part of the onboarding process?
    - Training on key risks, code of conduct, relevant policies and directives
    - Is this tracked?

- Promotions / Appointments
  - Do they include compliance considerations when hiring and promoting?
    - Alerts / "near misses" around an individual
    - Demonstrates right "tone"

Example: Health & Safety

- Can you combine your messaging with a strong internal communication resource?

- Manufacturing focuses a lot on safety and speaking up when there are dangers.
  - Use this messaging and talking points to illustrate your goals
  - If we can talk about Health and safety issues, Why not compliance?
Management

- The Holy Grail!

- Walk the walk & Talk the talk...

- If management is already your partner in compliance comms, you’re way ahead of the game!
  - Internal and external management messaging
    - Meetings, calls, external events
    - When your “brand” includes compliance

Share your experience!

- Divide into groups and discuss the following:
  - Who are your best allies?
  - Where do you face the most resistance?
Share your experience!

- What did you discuss in your group?
  - Similar or different allies / issues?
  - Any surprises?

What did I not cover that you would like to know?
Thank you for your attention & participation!