

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?



Credit: Liz Climo (@lizclimo)
<https://thelittleworldofliz.com>
lizclimo.tumblr.com

Do you communicate?

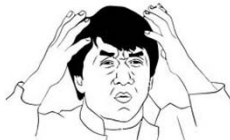
- ▶ Launch / Update of Code of Conduct
- ▶ Launch / Update of Policies & Directives
- ▶ Yearly / Mandatory Training
- ▶ Whistleblowing hotline
- ▶ Compliance personnel changes
- ▶ Intranet page
- ▶ Alert statistics and lessons learned

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

CONSISTENCY
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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! >>>

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European Compliance & Ethics Institute

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