Communicating your compliance & Ethics Plan

COMPLIANCE TOOLKIT

Introduction

Companies of every size should have some sort of compliance program. These programs may include training, safety systems, and conduct and ethics codes. Codes of conduct can simplify business decisions by setting the tone for a company's operations. But if a code isn't fully communicated, it might as well not exist.

If you don't yet have a compliance program, the "Creating a Code of Conduct" Toolkit is a good start. If you have a program, this Toolkit contains tips for making that program a natural part of your daily operations.

Communications are essential. When ethics and compliance become the core of your company's decisions, employee morale and productivity improve, and legal and regulatory issues diminish. And a reputation for ethics can distinguish you from the competition.

GOOD COMMUNICATION IS AS STIMULATING AS COFFEE

Anne Morrow Lindbergh

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Plan communications

Communication is critical to the success of any compliance and ethics program. Many businesses create codes of conduct or purchase compliance training programs, but fail to fully launch them. The result: money spent for zero change.

Federal regulators look for effective ethics and compliance programs when investigating a business. If a company has an effective program, fines may be decreased. This benefit depends on how robust the program is, and a little-known program is far from effective.

Compliance and ethics experts agree that an effective program depends on "tone from the top." In other words, directors and managers should show the company's commitment to ethics and compliance by words and example. If an organization's top management "walks the talk," employees are more likely to live up to that example.

Just as an ethics and compliance plan should be specific, the communication plan should also be tailored to your needs. For instance, in a small business with few employees, it is easy to see the boss prioritizing ethical actions. It is also simple for the owner to check that everyone is trained. But in a business with many locations and employees, communications can easily break down.

Besides leading by example, consider:

- Meetings
- Emails and memos
- Documentation
- Live and remote training

There are also ways to reinforce your message through your company's activities and technology. Be creative!

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COMMUNICATIONS TOOLKIT FLOWCHART

This Toolkit tailors your communication plan to your individual organization. Follow the steps shown below.

1. Find out how familiar people currently are with your ethics and compliance plan by giving an Awareness Survey.

2. Decide how best to effectively reach people to share your message.

3. Prioritize and roll out your communications.

4. Review results and adjust as needed.

Employee Awareness Survey

This short survey will reveal what employees know about existing company standards. These questions give you a good start. Use an anonymous survey tool to gather results.

- Are you familiar with the company's Code of Conduct? (Answer: scale of 1-5 with 1 being "Not at all familiar" & 5 being "Very familiar")

Tip: Repeat this question for each standard or document you want to check, such as training requirements or a business expense policy.

- Where would you find the company's Code of Conduct [or other document]? (Provide multiple choice options)

Note: This should be centrally located and easily accessible; the intranet is a good option.

- Have you read the company's Code of Conduct [or other document]? (Answer: scale of 1-5 with 1 being "Never read" and 5 being "Recently read entire document")

- Which of the following is a value of this company as identified in the Code of Conduct? (Provide multiple choice answers)

Tip: If you are not using a code of conduct, adapt this question to ask about a policy that all staff should know.

- If you found out about something illegal or unethical happening at work and did not feel that you could speak with your supervisor, who would you contact? (Give multiple choice answers including the designated contact or ethics hotline)

- When was the last time you received ethics or compliance training? (Answers: Last 6 months/Last year/In the last 2 years/Longer than 2 years ago/Never received)

- What is the best way to learn about changes in company policies? What is the worst way? (Give space for opinions)

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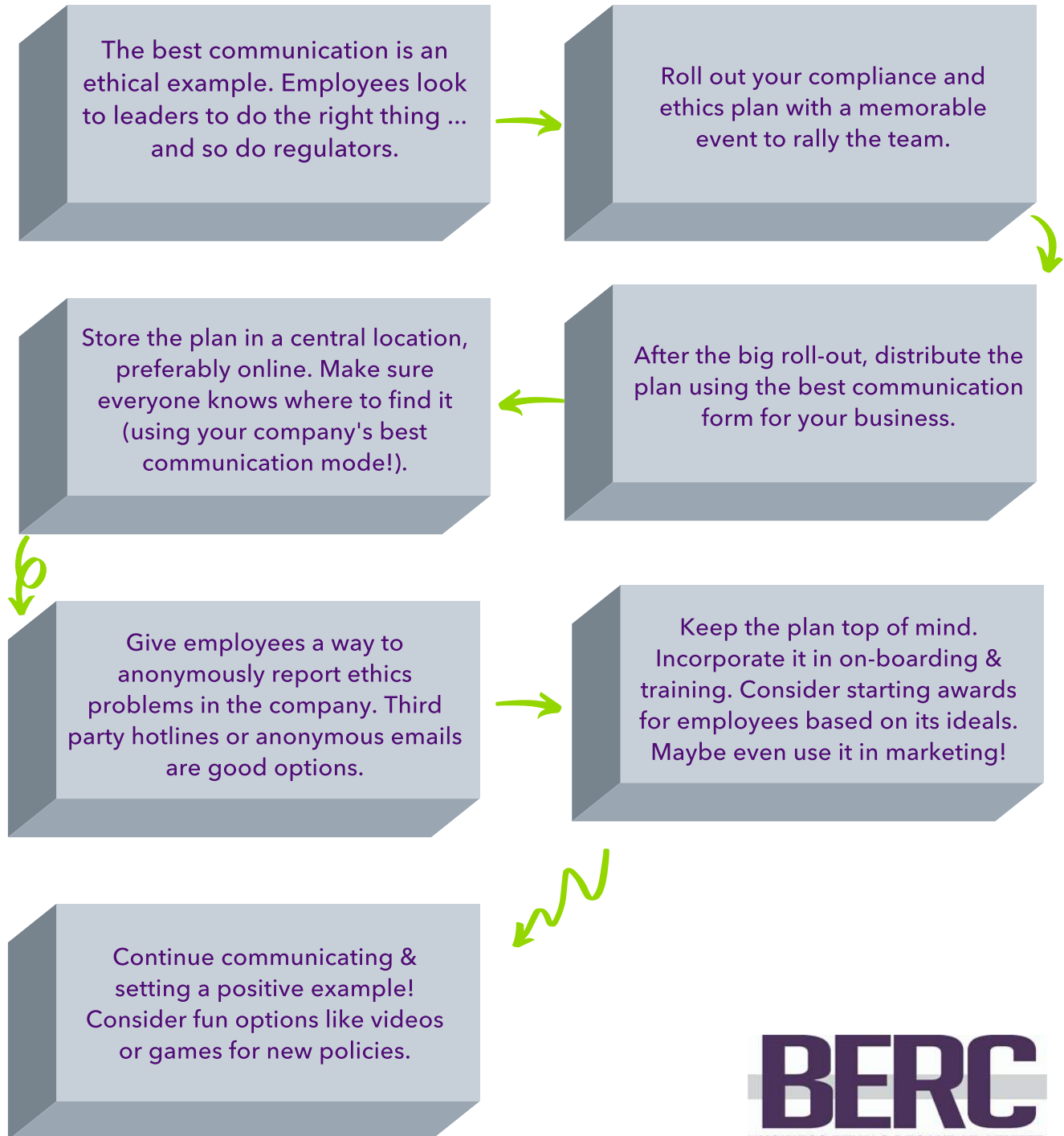
THE COMPANY'S COMMUNICATION STYLE

For most, the Awareness Survey will include some surprises. A company that pays for a whistleblower hotline may be dismayed that few employees know of it. Or that only about half may have read the Code of Conduct. Resources are unhelpful if they are unknown.

The trick is to get the word out. But how? If employees are buried in emails, another email won't work. Instead, figure out your company's strengths. This Q&A can help.

1. What communication avenues did your employees name in the survey from this Toolkit? While many may give routine answers, there may be some interesting ideas in that list.

2. Is your business all in one place or many? Communications should cover everyone in the business, wherever they are.

3. Does the company have a regular get-together? Even a regular teleconference could be a good time to roll out a plan.

4. Do you have a company intranet? Newsletter? Another regular communication? Some companies use back-of-door bulletins in the restrooms. What are your existing options?

5. What are the major ways that top managers interact with employees, if at all? Top managers should lead by example, setting "tone from the top."

6. How much do you rely on email? Is it effective? Maybe your company uses email all the time, but do they sink in? Try sending out an all-company message about a minor issue; near the end, include a note that the first 10 people who reply personally will receive a small prize (maybe a gift card). This test will show whether emails are really reaching their target audience.

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Communication is key

Together, the Awareness Survey and Communications Inventory provided insight into what does and doesn't work for communications at your company. Here's how to take that information and put it into action.

The best communication is an ethical example. Employees look to leaders to do the right thing ... and so do regulators.

Roll out your compliance and ethics plan with a memorable event to rally the team.

Store the plan in a central location, preferably online. Make sure everyone knows where to find it (using your company's best communication mode!).

After the big roll-out, distribute the plan using the best communication form for your business.

Give employees a way to anonymously report ethics problems in the company. Third party hotlines or anonymous emails are good options.

Keep the plan top of mind. Incorporate it in on-boarding & training. Consider starting awards for employees based on its ideals. Maybe even use it in marketing!

Continue communicating & setting a positive example! Consider fun options like videos or games for new policies.

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Keep communicating!

Communication isn't "one and done."

Many business owners and managers assume that employees know company policies and will report problems. But tools like the Employee Awareness Survey often reveal a different picture. Leaders need to set expectations and standards early and often.

Even good communication can be improved.

After working on a communication plan, companies may find the message still isn't getting through. Try running the Awareness Survey again. If the plan isn't working, update it!

Give employees a way to alert you to problems. Employees may fear reprisals, so an anonymous option can lead to better information for the organization. Follow up every time!

The best lead by example.

While you need an ethics & compliance plan, the best way to create an ethical culture is to behave ethically. If the boss emphasizes doing the right thing, employees will be inspired to do the same.