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

The Importance of Consistent Compliance Messaging Across the Organization.

– Kyle Lewis – Compliance Operations Manager *LafargeHolcim*

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

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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

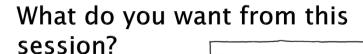
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High Five



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



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

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I don't care.

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

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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?

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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!"

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Other Pitfalls to watch out for:

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

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"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

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How do you measure compliance communications?

- Get a baseline
- > Set clear objectives & report on them
- Ask your employees
- ▶ REPEAT



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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?

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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!

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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.

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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?

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Who can help? Find allies and partners!

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



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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
 - · Don't start from scratch, expand and clarify the messages with compliance in mind
 - · Be authentic to the speaker's voice

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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"

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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?

Health & Safety

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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

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Share your experience!

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

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Share your experience!

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

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What did I not cover that you would like to know?



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