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?

- Kvle Lewis
- American / Canadian, living in Switzerland
- → Compliance Operations Manager, LafargeHolcim
- $\,\circ\,$ 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

Do as I say, but not as I say...
Furonean Compliance & Ethics Institute

8 March, 201

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

Oo as I say, but not as I say... European Compliance & Ethics Institute



session? • Examples	1	want do you want do do	I don't care. You decide
→ Ideas?			
▶ Motivatio	n?		
→ Understa	nding?	man.	
Do as I say, but not as I say European Compliance & Ethics Instit	Credit: Liz Climo (@lizclimo) https://thellttleworldofliz.com Lizclimo.tumblr.com		Kyle Lewis 28 March, 2018

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

as I say, but not as I say... ropean Compliance & Ethics Institute

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?

Do as I say, but not as I say...

Kyle Lewis

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!"

Do as I say, but not as I say... European Compliance & Ethics Institute

Kyle Lewis 28 March, 2018

Other Pitfalls to watch out for:

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

Do as I say, but not as I say... European Compliance & Ethics Institute

"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

Do as I say, but not as I say...

Kyle Lewis

How do you measure compliance communications?

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



Do as I say, but not as I say... European Compliance & Ethics Institute

28 March, 2018

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?

Do as I say, but not as I say... European Compliance & Ethics Institute

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:
 - $\,^\circ\,$ 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!

Do as I say, but not as I say...

Kyle Lewis

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.

Do as I say, but not as I say...
Furonean Compliance & Ethics Institute

8 March, 201

Take away: Consistency & KPIs



Do as I say, but not as I say... European Compliance & Ethics Institute

2

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

TEAMWOR

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

as I say, but not as I say... ropean Compliance & Ethics Institute

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?
- and promoting?Alerts / "near misses" around an individual
- Demonstrates right "tone"

Do as I say, but not as I say...

Kyle Lewis

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?



Do as I say, but not as I say...
Furonean Compliance & Ethics Institute

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

Do as I say, but not as I say... European Compliance & Ethics Institute Kyle Lewis

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?

Do as I say, but not as I say...

March, 2018

What did I not cover that you would like to know? Do as I say, but not as I say... European Compliance & Ethics Institute 28 March, 2018 24

