A History of SCCE with Debbie Troklus

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Corporate Compliance & Ethics Week: Engage your enterprise

» Corporate Compliance & Ethics (CC&E) Week will be observed November 1-7, 2015.

» CC&E Week should be affordable, fun, engaging, and informative.

» This is a great opportunity for compliance professionals to discuss past accomplishments and future objectives.

» Compliance professionals cannot be present at all locations simultaneously, but compliance activities can be.

» Activities should incorporate employees at all levels of the organization.

As we approach the final quarter of the year, it is a time when operational units celebrate accomplishments and establish future objectives. Starting this year, Corporate Compliance and Ethics (CC&E) Week occurs in November and is rightfully aligned to celebrate the US Federal Sentencing Guidelines.[1] Globally, compliance officers (CO) will reserve time to promote their compliance and ethics (C&E) programs. This is a time to reflect on accomplishments of the C&E program. Also, it is a time to discuss current activities, such as pending regulations and anticipated strategies for complying. It is a time to publicly identify and recognize Compliance and Ethics department members. Lastly, it is a time to recognize supporters and contributors outside of the department.

Establish your foundation

After making the decision to celebrate CC&E Week, it is important to establish the scope of the activities for the week. A few topics are year-to-date accomplishments, current activities (e.g., corporate initiatives, audits, training), opportunities for improvement, staff recognition, and objectives for next year. CC&E Week is not about overwhelming the organization with information, but rather promoting program awareness.

Establishing a planning committee is not necessary, but is recommended. Surprisingly, there may be many volunteers for this activity. By establishing a planning committee, the CO improves the likelihood of generating multiple creative ideas. For planning committees consisting of members from operational departments, there may be additional potential benefits, including indirectly obtaining operational support, volunteering actual case studies,

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and if necessary, receiving constructive criticism.

A planning committee can:

- Identify and share ideas or activities from the past;
- Determine whether current events may impact selection of this year's activities (e.g., new leadership may create a theme for CC&E Week); and
- Identify special recognition for individuals and departments that have gone above and beyond.

Corporate compliance and ethics programs have limited budgets, so available funding is often small for activities. Establishing a baseline for activities will help keep expenses to a minimum. Consider activities that make use of current technology or applications— maybe online games, posted documents on the organization's Intranet, or email-based communications and activities.

Establish a theme for CC&E Week. The theme should reflect the organization's culture. The theme can also reflect the maturity or development of the compliance program. For example, a theme for a new C&E program may focus more on policies and procedures and training and education. For a more established program, the focus can be for ideas to help address some of the most commonly identified risk areas within the organization.

Incentives are great for compliance and ethics programs. Incentives throughout the year encourage ongoing employee engagement. CC&E Week is an opportunity

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demonstrate gratitude for employees' commitment by distributing t-shirts, pens, lunch bags, USB car chargers, brand merchandise, water bottles, and mouse pads as rewards and/or activity prizes.

Location: Be everywhere at once

Obviously, COs cannot be at every location at the same time; however, evidence of an effective corporate C&E program must be embedded throughout the culture of the enterprise. CC&E Week is an opportunity to promote the compliance program throughout the enterprise. Depending on the size of the organization, it may be impossible for the CO to be everywhere, but there is a way to do it. For organizations with fewer than 10 locations within driving distance (less than 40 miles), it may be possible to have onsite activities. For example, a schedule may consist of morning and afternoon sessions each day alternating between sites. This allows the CO to be physically present, and it allows employees to meet the CO. Remember, employees report potential risks and concerns when they trust the process. Meeting the CO in person allows employees to establish rapport and generate trust. Spending some time at a location is better than no time at a location.

Onsite

While onsite, there are two approaches to engaging employees. The first approach is to set up a compliance station. This will be the site where employees come to meet you. This is where you distribute handouts,

answer questions, play a game, and/or distribute snacks. Another approach is to walk throughout facility. Of course, this depends on the facility's size and whether you are to complete the "meet-and-greet" before leaving for your next activity. Best practice is to spend some time at a stationary location and then, walk around the facility. The goal is to meet as many employees as possible when there isn't an immediate need. Employees on tight deadlines may not participate in a CC&E Week activity, but respect the time the CO dedicated to visiting the department.

Offsite locations

For offsite and remote location employees, use email to facilitate daily quizzes and offer prizes. When the CO or compliance staff is unable to visit a facility, send snacks or treats to the facility and have posters available. When possible, identify a point person at the offsite location. This may be a compliance champion. Make a plan to coordinate with them to facilitate items such as an overview of the corporate C&E program, CO and compliance staff contact information, and hotline number. Confirm that the compliance champion can manage compliance-related activities, such as hanging up posters for you in key locations or setting up a CC&E Week table or station to distribute snacks or treats for a short period.

Vendors

Invite vendors and give them the opportunity to participate in the activities. For example, send quizzes to vendors to test their knowledge on corporate compliance and ethics-related activities. If regulations and policies permit, check to see if vendors can donate prizes or sponsor a lunch and training session. Definitely proceed with caution. You don't want employees to walk away with any confusion about conflicts of interest in the compliance and ethics program.

People: Who to engage and how

Leaders of organizations know that people make things happen.[2] An effective compliance program without people doesn't exist. Engagement is essential. When people in the organization support, trust, believe, and respect the CO, they become advocates for the CO and the C&E program, thus propelling both as top priorities.[2]

CC&E Week is a great opportunity to initiate authentic relationships with new employees and nurture authentic relationships with existing employees. Engaging employees when there isn't a compliance-related urgency is ideal. During meet-and-greets, COs should ask open-ended questions and use active listening skills to demonstrate a sincere effort to absorb what a person is saying and feeling.[3] In some cases, COs can obtain more information from a candid conversation in a relaxed atmosphere than in a structured meeting in a formal setting.

Many CC&E Week activities address front-line staff, but all employees are responsible for compliance; therefore, activities should engage all employees. Top, middle, and front-line staff should be a consideration for CC&E week activities. This event is an open invitation, so it's important to communicate that point when promoting CC&E Week activities. To keep participants engaged, make sure the majority of activities focus on compliance topics that are in-scope for all employees. It is appropriate to mention specific topics for awareness, but staying on them too long will result in a dwindling audience.

If possible, try to initiate CC&E Week activities with a letter signed by the CEO and chairman of the board of directors. Have a member of the leadership team participate in activities by facilitating a game, handing out prizes, or distributing a treat helps bridge the gap between staffing levels, departments, and facilities.

According to Maxwell, empowering others is one of the most important things you'll ever do as leader.[4] Publicly acknowledging contributions made by all employees toward having an ethical culture is empowering. Empowerment has an incredibly high return.[5] COs with the ability to inspire employees who have different personality types, traits, comfort levels, and belief systems to commit to a desired corporate culture may be on their way to establishing an effective corporate C&E program.[6] Empowerment is universal and worth the investment.

Summary

CC&E Week is a time to promote the program and acknowledge employees' contributions to ensure its success. By embracing fun and informal activities, compliance professionals show that we are approachable, which may result in immediate information sharing. By establishing a sound foundation and areas of focus, COs can remain organized and anticipate a successful week. ✳

1. Roy Snell: "Corporate Compliance & Ethics Week is moving" Letter from the CEO, *Compliance Today*. April 2015, page 5.
2. Jeffrey J. Fox: *How to become CEO: The Rule for Rising to the Top of Any Organization*. 1998. New York. Hyperion Publishing.
3. Nicholas Boothman: *How to Make People Like You in 90 Seconds or Less*. 2008. New York. Workman Publishing.
4. John C. Maxwell: *Leadership 101: What Every Leader Needs To Know*. 2002 Nashville. Thomas Nelson Publishing.
5. Ibid.
6. Cindy Hart, Walter E. Johnson, Adam K. Weinstein, and Frank Ruelas: "Compliance 101: The seven essential elements, Part 4: Auditing & Monitoring" *Compliance Today*, May 2015, pages 84-89.

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