



3. Make Compliance personal

Challenge

The challenge in making Compliance personal: translating beautiful but sometimes vague core values such as 'integrity', 'respect' and 'socially responsible' into concrete steps that every employee can take every day themselves.

The aim is to make employees aware that they have taken on a personal responsibility. This manifests itself in the responsible handling of their tasks and powers and the resources provided. There are also limits to which every employee must adhere. This involves acting within the frameworks set by the Executive Board, Supervisory Board, investors and the law.

Making Compliance (more) personal and increasing the understanding of the 'why compliance' question should lead to responsible business conduct and increase the commitment of every employee. If Compliance can also appeal to every employee to leave the organisation a little better at the end of the day than they found it in the morning, the positive commitment of all can continue the (excellent/good) reputation of the organisation so that in 7 or 11 years, the organisation will still be successful.

Raising awareness of personal responsibility can be done by building a bridge to the employee's private life: at home, he/she often knows very well what he/she does and does not want (no theft; none too personal information on social media; careful handling of money and scarce resources; and so on). The employer actually wants the same thing: for all employees to handle company assets, competitively sensitive information and reputations carefully and responsibly.

Solution

Start with a code of conduct that is clearly written, preferably by communication specialists. The code of conduct should be written from the position of the average recipient. A paragraph can be added to each topic: "What does this mean to you?" - to make it concrete, personal and unavoidable. The underlying policies, guidelines and similar documents are also preferably written in clear, comprehensible language from the position of the average employee (if there is a need for manuals with lots of texts that exhaustively describe everything correctly, completely and legally sealed, then the policy could be a comprehensible summary of the manual).

Compliance also has the role of emphasising the personal responsibility of every employee: doing business responsibly is not the job of compliance, but of everyone, throughout the organisation. Emphasise that you expect every employee to try to leave the organisation a little better than they found it, and that every employee should lead by example.



Furthermore, require all employees in the Reporting Procedure ('Speak Up' instead of Whistleblower Procedure) to make a report of a suspected violation of a subject of the Code of Conduct for which another person could face imprisonment or the organisation could suffer serious reputational damage. Point out that such a report will always be followed up carefully, and that the reporter will be protected (no reprisals). Imposing this obligation allows employees to work together to defuse any potential 'serious' time bombs. Be clear about what obligations each employee has, and what additional obligations managers have. Use private examples to explain to employees why we have certain principles or rules in practice.

Facilitate moral dilemma sessions focusing on personal stories from the department's own practice. Senior management also has an important task here: to set a good example, create a safe working environment and openly discuss difficult dilemmas. In doing so, they send a clear message that only together, compliance can be (come) a success. Ask senior management to discuss their own, personal dilemma: a dilemma often has no right answers: you have to find them together. By making it personal, everyone starts to understand that internal rules are very logical and reasonable, and not as difficult as thought.

Actors

- Communication
- Hr
- (Senior) managers
- Compliance

Techniques

See under solutions.

Role Compliance Professional

Take the lead; talk to people and collect concrete examples from your own organization and use them, so that employees become convinced that compliance is not something abstract, whether violations and fines only occur with competitors, but also here, with us. Start experimenting with very personal messages. Let employees speak, use quotes and positive examples.