



## 8. Periodically put one important topic in the spotlight

### Challenge

Within many organizations, compliance and/or integrity is not necessarily 'top of mind'. In order to generate more attention, it is important that employees are aware of the relevant topics and the associated risks. As a result, employees learn to recognize these risks. In addition policies and procedures should be clear, so employees know what to do when they are faced with a potential compliance risk.

### Solution

In order to generate more attention/awareness with regard to compliance and/or integrity , it is useful to use periodic messages (e.g. via email, on intranet, with flyers/posters), with attention to a specific theme (e.g. Gifts & Entertainment in November, just before the month of December). Preferably, such notification is preceded by a short introduction to Senior Management (to endorse the importance) and provided with practical examples (how can this risk occur in daily life?). The message may immediately include a reference to the relevant policies and procedures and contact details of the Compliance Professional (telephone number/email address).

### Suggestions

The following practical tips can contribute to the success of the above-mentioned approach with the aim of always putting one specific Compliance theme in the spotlight:

- Get advice from the Communications team: make use of communication experts and copywriters within the organization;
- Distinguish between different target groups with different motives, knowledge levels and backgrounds and ensure that communication is tailored accordingly;
- Make it clear what you want to achieve and which message you want to bring across to whom via which channel, when;
- Translate the message into multiple languages, if necessary;
- Use different media to communicate the message (email, intranet, posters, a film, survey, workshop, possibly using actors);
- Work with print (flyers/posters) for locations that do not work much with computers/intranet (e.g. in a factory/warehouse);
- If necessary, send a mailing to all employees with a link to the message, to draw extra attention to it;
- Choose different communication channels and alternate them to avoid compliance communication 'fatigue';
- Consult with internal communication specialists about the strategy to be followed;
- Have the communication of Compliance reporting (visibly) supported by Senior Management.



In the context of 'the power of repetition', it is advisable to regularly repeat/ periodically turn off the messaging on specific Compliance topics (such as the Gifts & Entertainment policy). For example, prior to major sports tournaments (such as the European Championship, World Cup or the Olympic Games) and late November/beginning of December (before the Christmas period). This is of course nationally bound, in Asia for example that is the period just before the Mooncake festival and the Chinese New Year. Make sure that you dose the number of times you send out such messages (not too often per year).

Another possibility is to connect to a topic that is in the public eye at that time, due to news coverage. Or to draw attention to the desired manners and the speak-up procedure when there are many harrassment issues in the publicity, such as during the "me too" discussion. Keep in mind to work on emotion and approach the subject positively / solution-oriented. Create an image of 'Many are already doing well' (people want to belong to that). For example, "90% of employees have already completed this compliance training."

This is a form of nudging. More about 'Nudging' can be found in the book by Sunstein and Thaler from 2008, which is referred to in this article: <http://www.economist.com/news/international/21722163-experimental-iterative-data-driven-approach-gaining-ground-policymakers-around>.

## **Actors**

- Compliance Professional
- Communication
- HR

## **Role Compliance Professional**

The role of the Compliance Professional consists of directing the content and the form of 'advertising', by drawing up a communications plan (in collaboration with Communication) and also reporting on the progress of the implementation of this plan in the Compliance (quarterly) report. Make the communications plan part of your Annual Plan.

It is important that Communication supports this process to make the messaging prominently visible and recognizable to employees. Ideally, there is the possibility to respond, or to make a digital discussion (comments) possible (with the latter it is important that someone (Compliance) can moderate any discussions, or respond to received responses).

The tone of your message is very important. Let it depend on the topic and the target group.