LIVING YOUR BEST COMPLIANCE LIFE

65 HACKS & CHEAT CODES TO
LEVEL UP
YOUR ETHICS & COMPLIANCE PROGRAM

EXPANSION PACK

Printable companion piece

YOUR JOURNEY BEGINS HERE

65 HACKS + CHEAT CODES TO LEVEL UP YOUR ETHICS + COMPLIANCE PROGRAM

BEHAVIORAL CLOCK INITIATIVE SELF-ASSESSMENT

Print and fill this table in. (Page 1 of 2)

Rate the following "I ..." statements on a scale of 1-5 (1 = never; 5 = always)

I regularly address ethics and compliance topics in staff meetings.	1	2	3	4	5
I am a role model for proper business conduct and integrity; I inspire my direct staff to uphold the company's standards and values.	1	2	3	4	5
I maintain an "open door" that employees are comfortable using for positive, negative or sensitive issues.	1	2	3	4	5
I take prompt action upon observing or learning about potential unethical or non-compliant behaviors and issues.	1	2	3	4	5
I take ethics and compliance into consideration when making business decisions.	1	2	3	4	5
I discuss with my team practical examples of compliance dilemmas based on business- and role-specific risks.	1	2	3	4	5
I take steps to ensure my team feels comfortable speaking up when they have concerns or need to identify possible compliance issues.	1	2	3	4	5
I feel that I am up to speed on the company's compliance policies, procedures and guidelines, and I work to ensure they are followed.	1	2	3	4	5
I invite compliance representatives to attend my department meetings and annual conferences.	1	2	3	4	5
I escalate compliance issues that are reported to me or otherwise come to my attention.	1	2	3	4	5
I suggest to colleagues that they involve compliance in the development of new business initiatives.	1	2	3	4	5

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Print and fill this table in. (Page 1 of 2)

How would you rate your understanding of these policies and procedures on a scale of 1-5 (1 = not familiar; 5 = very familiar)?					
Code of conduct	1	2	3	4	5
Anti-corruption policy	1	2	3	4	5
Donations policy	1	2	3	4	5
Antitrust policy	1	2	3	4	5
Gifts, meals and entertainment policy	1	2	3	4	5
Policies and procedures regarding relationships with referral sources	1	2	3	4	5
Non-retaliation policy	1	2	3	4	5
Conflict of interest policy	1	2	3	4	5

Free text questions

What are your key initiatives for your area of the business over the next several months to a year?

How can the company's compliance department assist you?

What has been your biggest frustration in achieving a true partnership with the compliance department?

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INTAKE PROCESS SAMPLE IMPROVEMENT QUESTIONS

Area of improvement	Question for intake process
Increasing reports to internal channels	*We're so grateful you took this important step to report. May I understand what made you select the compliance action line as your preferred reporting channel? OR* *Thank you so much for raising this concern with me today. Speaking up was the right thing to do. May I check whether you raised this issue internally before speaking with me today? If yes, what was the reaction; if no, why not?*
Increase reporting rates	*I know that sometimes it can take a bit of courage to call us. What persuaded you to take the step to reach out to me today? OR* *Is there anything that caused you hesitation before reaching out to me today that I can reassure you about?*
Decrease perceptions of retaliation	*[Where relevant] You've mentioned that you are scared of being retaliated against for making this report. I want to reassure you that we have a strict non-retaliation policy which I'm happy to send it to you if you would like a copy. Could you give me some more information about why you feel retaliation could happen to you? OR* *Is there anything that caused you hesitation before reaching out to me today that I can reassure you about?*
Increase reporter/potential reporter awareness	*It's always great to receive a report. Thank you for doing the right thing. What brought you to me today? What resource did you refer to in order to learn the reporting line contact details? OR* *May I ask if you had to spend much time tracking down the contact details to reach out to me today? Was it a user-friendly experience? Is there another resource you went to first that you think ought to have compliance action line details?*
Increase customer satisfaction	*I'm so grateful to you for taking the time to report this matter to me. Is there anything on your mind that I can reassure you about or anything you would suggest to us that would have made this experience more user-friendly for you?*
Understand additional reporter demographics: who is reporting, who is not and whether there are specific concerns that correspond to seniority to better target awareness and persuasiveness campaigns	*This information is for data-gathering purposes only: Please could you tell me if you are a team leader or an individual contributor?*

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ELEVATOR PITCH WORKSHEET

Content checklist

☐ *A non-conventional approach or opener*

☐ *Packing a punch in a very short space of time*

☐ *Quantitative data or impressive facts*

☐ *Value proposition & unique selling factor (how you solve the other person's problem and what sets you apart from other compliance professionals)*

☐ *Versions for different audiences (prospective employer vs. introduction at a conference)*

☐ *If applicable, a call to action you want to make (example: "Please keep me in mind if you hear of any chief compliance officer roles in Chicago.")*

Round 1 loving feedback

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Round 2 loving feedback

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PROGRAM MYSTERY SHOPPING SAMPLE QUESTIONS

(Page 1 of 2)

Sit in on a presentation or training session you wouldn't normally attend, ideally at the back of the room.

1. How does the presenter/facilitator command the room and audience?

2. Where are attendees directing their attention at the beginning of the presentation, at the midway point and nearing the end of the scheduled time?

3. Is information presented in various ways or only through a lecture?

4. How does the facilitator handle questions?

5. Was it difficult to sit through?

6. How do you feel at the end of the session?

Ask a member of the business to send through the last piece of written advice they received from the compliance department and review it.

1. Is it accurate?

2. How long did it take to receive the response after issuing the question?

3. Is it courteous and customer-centric?

4. Are there any "no" responses provided that could have been, "Yes, we can do that with the following controls in place ...?"

Write a list of resources or pieces of information that you would want the majority, if not all of the organization, to have access to (e.g. business unit compliance officer contact details, code of conduct, hotline information, gifts/meals/entertainment matrix, etc.)

1. How long did it take you to find the information?

2. How many clicks/pages did it take to find it?

3. Are the intranet and other systems containing the information user-friendly?

Identify your last communication campaign and released or updated policy. Ask a business in the area to send through the materials in local language (where relevant).

Identify the biggest 1-3 compliance risks for a business unit. Identify the most relevant policies to those risks. Ask to meet with the leader of the business and a more junior member of staff who must apply the policy and ask them to explain how they apply the policy and explain in their own words how the policy addresses those risks and how that impacts the individual's day job.

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PROGRAM MYSTERY SHOPPING SAMPLE QUESTIONS

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Ask to shadow a business sponsor who is instructing a due diligence inquiry to be carried out, including conversations with the third party.

1. How efficient is the overall process?

2. Determine whether the process is negatively impacting the relationship with the third party in a way that can be better managed by compliance.

3. Determine whether there are any redundant aspects of the process (for example, carrying of reference checks used to be de rigeur, but nowadays few organizations conduct reference checks because they have decided the utility of the reference check is outweighed by other considerations).

4. Determine whether the compliance department is responsive to questions.

Call the reporting hotline.

1. How long does it take for someone to answer?

2. Is there someone available to speak a non-English language critical to your workforce?

3. How does the intake person respond to concerns about retaliation? Are you reassured by the response?

4. When you ask a basic compliance advisory question, do you get the correct response?

Ask to be enrolled in an e-learning course that would not ordinarily be assigned to you. If you have feedback surveys from previous compliance training, review the stakeholder-identified areas for improvement against this module. Has the feedback been addressed? Note:

1. Whether the content was relevant to the role of the target audience.

2. Whether the content was aimed at business staff and limited when it comes to information interesting for compliance officers to know but not the business.

3. Was it difficult to sit through?

Ask a team member responsible for risk assessment interviews to interview you.

1. How does it make you feel to be on the receiving end of the questions?

2. Are the questions relevant?

3. How does your colleague respond to any questions?

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SAMPLE TALKING POINTS AND QUESTIONS FOR MANAGERS

I just completed the code of conduct/specialized topic training. Who else has completed it? What did you think? Are there any practices we need to reconsider in light of this new/revised policy?

Compliance and senior management ask us to maintain an open-door policy for our teams. What does that mean to you? How can I be better at it?

The employee engagement survey/the company's culture of integrity survey indicates that [X percent] of the organization fears retaliation if they speak up. Any thoughts on why the figure isn't lower? What can I do within our team to get that number down?

Compliance and senior management asks us to promote tone from the top and mood in the middle, meaning that leaders are demonstrably seen to walk the talk about ethics and integrity. What do you think I could do better? What one thing will you do to better walk the talk as a team member?

What do you think is the difference between a culture of integrity and a culture of compliance?

Do you think our organization has a culture of integrity? What's the biggest obstacle to achieving that? What about within our team?

Take a conflict-of-interest issue in the news and ask what the CEO or top executive should have done and what policies internally might apply if that happened in your organization.

What low-hanging fruit exists for compliance to be better embraced by the organization? (Feed actionable points back to compliance)

What is a culture-of-integrity initiative that should come from from the business rather than being reactive to a compliance request during compliance week?

What's the difference between being an upstander and a bystander? How easy is it to be an upstander in our organization?

Do you see a conflict between doing the right thing by our customers, doing the right thing by our organization and doing the right thing by your personal values?

I'd like us to have a couple of team KPIs related to ethics and compliance. What do you think they should be?

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INITIATIVES TO ADDRESS COMPLIANCE PROGRAM ELEMENTS

Print and fill this table in. For example, under "Tone from the top," one company listed: Executives teaching learning objectives in training, CEO coming up with initiatives for program and taking responsibility for implementation and management doing a "Compliance Minute" at the beginning of every meeting.

Element of program	Initiatives in place		
Tone from the top			
Written policies & procedures			
Compliance officer & compliance committee			
Effective training & education			
Effective lines of communication			
Internal monitoring & auditing			
Prompt response to problems & corrective action			
Well-publicized disciplinary guidelines			
Risk assessments			
Culture of integrity			
Behavioral science			
Data analytics/AI			