COSMOS
Navigate the Compliance Universe

International Compliance 101, 2nd Edition
Chapter 4: Tailoring Your Compliance Program

The compliance program must be tailored to fit your organization. There is not a "one size fits all" program. As we have discussed, you need commitment from the top actively supporting your program, financial support including necessary staffing, and a continual assessment of your program. Once you understand the organization's needs, then you can fit your plan to the organization. The code of conduct should be the focal point of your program.

1. Communication

Communication of your program's expectations and goals is key to its success. The communication must be clear, concise, and creative. Much of compliance-related information can be difficult to understand because so much of it is buried in thousands of pages of regulations. The written standards of conduct and policies and procedures should be clear and easy to understand, and they should be distributed to all staff. What good is the compliance plan if no one in the organization knows it exists? Compliance may not be an exciting topic for everyone, so be creative and use many methods to communicate. Be creative, and keep your program fresh and exciting.

The 3 Cs of Communication

- Clear
- Concise
- Creative

There are many ways to communicate the compliance message. Communicating can include going to each site of operations and listening to their overall challenges in the field; conducting one-on-one training; or using role play exercises during education sessions. Look for ways your organization celebrates successes, and tap into them. If your organization has a holiday party, consider contributing in some visible and fun way—a skit or karaoke song for example, if that fits your organization's culture. Trinkets with a compliance theme or message can be popular, assuming the budget allows. Cups or pens can be inexpensive enough to allow distribution to all employees. Posters, brochures, and wallet cards can also be effective. Consider a compliance open house or a "road show" to other departments. Social media or email alerts targeted to affected departments are a good way to get attention. (Just be sure to use them sparingly; if used too often they will lose their sense of urgency.) Your reporting system is also a communication tool. Make sure all employees know about the reporting systems you have in place. And as much as is possible, get back to them with results—results of investigating questions, complaints, results of compliance successes, results of audits. Remember: communicate, communicate, and communicate!

The most important communication device is an open-door policy in the compliance department. Help managers to be open to employee questions. Encourage all staff to stop by the compliance office with questions or concerns. Compliance personnel, managers, and supervisors should keep their eyes and ears open constantly to pick up on the conversations that employees have and the subjects they bring up that may have revealing compliance-related information. The accessibility of the compliance officer will communicate much more than

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the specifics of regulations and laws; it will communicate a sense of mutual trust and common goals.

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