The Complete Compliance and Ethics Manual 2023
Onboarding as a Key to an Effective Compliance Program

By Theodore Banks[1]

As a compliance officer, your challenge is to seize every opportunity to inculcate every employee with the values that are consistent with an effective compliance and ethics program. It is important to set the tone for employees as early as possible in their career, so they won't need to "unlearn" any contrary lessons they might pick up if there is a lag before you can get to them.

Therefore, your connection to the employees should begin as early as possible—even before their first day on the job. Right after an employee has accepted a job offer, you should make certain that they receive information about the company's commitment to doing business with integrity. Some studies have indicated that the *only* time that many employees read things from the company is during the interim between their acceptance of an offer and the first day on the job. So, take advantage of this, and make sure that you send compliance information as soon as you can. Receipt of the code of conduct by a new employee can become the foundation for receptivity to subsequent compliance activities. Use email, paper mail, and mobile phone apps to increase your chances of connecting with the new employee. In fact, if you are dealing with a fairly young age cohort, getting them to engage with compliance on their phones is a great way to connect.

Your next opportunity is during the onboarding or new employee orientation process. If the company does not have an organized new employee orientation program, you should make one. Schedule time with the new employees, either individually or in a group, introduce yourself, and explain the importance of following the company's policies as a key to both the success of the business and their personal career success.

If there is an organized orientation program, your challenge is to make sure that you are part of it. Often, the human resources department wants to completely control the content, so that they can have enough time to explain things like how to file a medical claim or the vacation policy. Yes, those subjects are important, but employees' self-interest will be sufficient motivation for them to learn about these mechanical processes. Unfortunately, we can't count on the same motivation for finding out about compliance and ethics. If human resources resists giving compliance time on the agenda, then it is time for you to use the power of the most senior executive responsible for compliance and get them to insist that compliance be part of the program.

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