



our values  
our strength

Middle Manager Program

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# Why Introduce a Middle Manager Program

- Close the gap between senior management, middle management and employees.
- Equip managers to engage their employees in conversations on compliance to create a culture of ‘organizational justice.’
- To create a culture of organizational justice, companies should start by following the guidelines:
  - Equip managers to deal decisively and consistently with instance of misconduct or unethical behavior;
  - Show the whole employee population—using real instances from the company—how the company deals with misconduct; and
  - Close the loop with employees who report misconduct.

\* Survey on Employee Fraud and Misconduct



# What Does a Successful Middle Manager Program Look Like?

*Does it Really Exist?*



# Middle Manager Program

The Goal: Empower managers to have ethics and compliance based discussions with their employees.

The program must be:

- ✓ **Convenient.** It should not be a 'burden' to managers and should not be a 'lecture' to employees.
- ✓ **Engaging.** Topics must be engaging so employees participate.
- ✓ **Simple.** The more complex the program the more difficult to gain buy-in.
- ✓ **Ongoing.** Discussions should be ongoing, not a one-time event.
- ✓ **Brief.** Sessions should be able to be completed in 10 minutes but be dynamic enough to allow for longer discussions.



# Middle Manager Program - Materials

- Focus on the 'gray areas' of compliance. This is where employees have the most questions.
- To minimize costs, develop in house and ensure they are discussion based. Materials we developed include:
  - Employee Presentation
    - Case Study
    - Discussion Starters
    - Lessons Learned
    - Where to Report Concerns
  - Detailed Facilitators Guide
  - FAQs
- Translate into core languages.
- Delivery options can include intranet, secure internet site, unsecured internet site or company LMS.
- Post a demonstration video for managers new to the process.
- Create new materials on a regular basis.



# Middle Manager Program - Rollout



# Middle Manager Program - Rollout

- After completion, managers log into the company's Learning Management System and provide the information below:
  - Date discussion was completed
  - Number of people in attendance
  - Feedback on how the session went
  - Recommendations for future topics
- Individual employees are not asked to confirm attendance



## Are You Ready?

- Assess your organizations culture prior to implementation. How do your employees best receive new initiatives?
- Ensure you have a mature compliance function prior to attempting to implement.
- Pilot the program with a targeted audience that volunteers to participate.
- Gather feedback from pilot participants. Ensure feedback is implemented and communicated – adds credibility.

## Business Scenarios

- Develop scenarios in conjunction with the business and in response to manager/business requests.
- All scenarios should be based on actual company situations.
- Add new scenarios in response to annual risk assessment results and trends in case management system.





