# Rethinking Communications

## *5 ways to boost the effectiveness of compliance communications*

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## Introduction

Do you worry that your compliance program has grown stale? Have your employees become weary of the same old messages delivered in a predictable way? Perhaps you wish you could dramatically impact prevailing attitudes and behaviors but you're just not sure how. If so, the suggestions that follow may prove helpful.

Some compliance programs show a significant commitment to communicating their Code of Conduct and other policies in ways that are highly effective, but many overlook even the most basic elements of a best-practices approach to communications. Communicating in an effective and ongoing manner requires a little discipline, but it need not be difficult.

Here are five things that you can start doing right away to inject fresh, new life into your company's compliance communications:

## 1. Stop depending on "traditional" e-learning as your only mode of communication to employees

This may not describe you, but it certainly does describe many compliance professionals.

Sometime in the early to middle part of the last decade, most companies with more than a couple hundred employees moved from a training model that was almost entirely conducted in person to a model that was either partially or completely computer-based-training driven. Of course, CBTs have a lot going for them. Asynchronous learning means saving lots of time (and thus money) because learners don't need to travel to training locations and can plan to take training when they have a free moment. From a risk management perspective, CBTs are ideal because they provide you with a record of precisely what content your learners viewed and precisely when they viewed it, as well as proof that they were able to answer a handful of questions accurately.

The problem, of course, is that many commercially available CBTs are still being sold in long, 35 to 60-minute formats, and it doesn't take the assignment of many such courses before learners start to feel daunted by the amount of training they are required to take.

> Training courses that are too long can foment attitudes of resentment and resistance

There is a deeper concern, however, regarding the fundamental effectiveness of such training programs. Although these programs may be designed using state-of-the-art adult learning methodologies, the fact is that if the information in the course is not being periodically and

regularly reinforced over time, retention will drop significantly.

This is not an argument to abandon e-learning. E-learning generates training records that vastly increase the defensibility of programs over those that lack such records, and that is reason enough to continue. Best practices dictate that a 35 to 60-minute course may be used for all-employee, once-a-year Code of Conduct training, or for highly targeted training given to an individual whose risk profile demands in-depth exposure to a specific topic. But to depend on e-learning as your sole mode of compliance communication does not make sense. Most compliance communication is about awareness. In many cases, long e-learning programs can be replaced by quick bursts of information that are much less intrusive, are received much more appreciatively (for being brief!), and ultimately can be much more effective. Plus, these bursts allow you to leverage the power of repetition throughout the year for an impact you cannot achieve through longer training events.

## 2. Start taking a more holistic approach to your communications program

When was the last time you took an inventory of all of the ways in which communications are shared across your organization? Many compliance professionals found one or two avenues that were easy enough to use when they started communicating, but haven't been able to grow their communications capabilities since then. This means that there are many of you for whom the primary modes of communication to employees are still email and the occasional memo. To be a better compliance officer, you may need to start thinking more like a comprehensive product marketer. See Figure 1.0 for examples.

| Where Comprehensive Product Marketing uses... | Comprehensive Compliance Communications can use... |
|---|---|
| Web and Email Strategies | • Content-rich intranet/SharePoint sites<br>• Email marketing tools (e.g. Constant Contact) |
| Public Relations | • Company Newsletters/Blogs |
| Print Advertising | • Ads in Company Publications |
| Television Advertising | • Short Videos on Monitors/Kiosks/LMS |
| Product Placement | • Orientation, Staff Meetings, Safety Briefings, etc. |
| Dealer Meetings and Promotions | • Manager's Training, Tone-at-the-Middle Initiatives |
| Billboards | • Bulletin Boards |
| Trade Shows | • Kiosk or Table at Company Events |
| Direct Sales | • Instructor-Led, Manager-Led, Webinar, One-on-one meetings |

*Figure 1.0*

Ten years ago when I would publish an article or give a talk on the topic of multi-modal and multi-channel compliance communications, these ideas were still gaining momentum in the compliance community. Today, everyone talks like that. But I think it can still be intimidating if you don't know first-hand how simple multi-channel approaches can be.

So, start by making a quick list of the channels in use at your company. You already know the first few:

- *Email* – Clearly you can send emails out to your employees and have a reasonable level of assurance that messages will reach them. Of course, you won't know whether or not they read them.

- *Compliance Intranet Page* – If you are driving employees to your intranet page by links sent in emails, the challenge is to keep intranet content fresh, interesting, and useful. Otherwise, few will use the page and certainly fewer will bookmark it.

- *Periodic briefings at company Town Hall meetings* – Perhaps you're called upon, during the company's quarterly review, to give employees an update on compliance. While these presentations can potentially reach a large audience, there's a good chance your message will get lost among the other company news that is being shared.

What communication channels might you be overlooking?

- *Kiosks or monitors* in cafeterias or other gathering places – You can easily get access to the communications staff that handle the programming for these very visible channels and start running short videos or other media materials.

- *Monthly staff meetings* – A periodic meeting is a great place to plant materials to start driving that ever-elusive Tone at the Middle you've heard so much about. If managers are armed to facilitate simple conversations about compliance topics with their staffs, a wide-open channel of dialogue between managers and employees emerges.

- *Trackable marketing email platforms* – Your marketing group may well already be using a commercially available marketing email platform that allows them to monitor who is opening and interacting with their messages. Constant Contact, Exact Target, and other such platforms can provide you with a great option for creating a record of communications by individual recipient. At no additional cost to the company, you can leverage these tools to communicate – and measure the uptake.

- *Your phone system!* Did you know that something called "voice casting" is now available commercially at a relatively low cost from a number of companies? What this could allow you to do is to record a message from your CEO emphasizing the critical nature of compliance and plant that message directly into everyone's voicemail box. How's that for a Monday morning wakeup call?

- *Bulletin Boards* – Employees perusing bulletin boards for specific information of interest may actually be quite receptive to finding periodic, unexpected compliance office communiqués displayed there.

- *Newsletters, blogs, or other publications* – regular Q & A columns or other pieces in the company's internal publications can help solidify the presence and value of the compliance office.

- *Product launches and sales meetings* – These may offer additional avenues for reaching employees, especially if you can select topics that dovetail with other agenda items.

Think about which of these channels (and others that may exist in your organization) will work best for your employee group, and how the channels might interact synergistically. Then select a few of the most promising avenues of communication you haven't tried to focus on.

## 3. Create a simple communications plan that reinforces key messages with regularity

Once you've targeted three or four communication channels, it's important to learn how to use them and to establish a schedule for regular, ongoing use. Do your research about who manages the channel, what the process and format for submitting materials is, and what the appropriate deadlines for submission are. Partner with them. Like magazine editors, they are often looking for high quality, engaging content. Taking this simple but necessary step will ensure that you'll be reaching employees consistently and repeatedly. A coherent and structured plan will ensure that plugging communications into your selected channels becomes part of your regular workflow, and not a series of one-off events that interfere with your "real" work.[1]

As you craft your plan, look to offer short, non-intrusive interactions that can easily be incorporated into your employees' workday and that appeal to all learning styles (e.g., visual, auditory, reader/writer, and kinesthetic learners).

## 4. Begin structuring your messages into short, powerful bursts of knowledge

Learning bursts are all about breaking long, complex messages into a series of short, simple, repetitive messages. Consider that six 5-minute messages delivered at intervals throughout the year can be much more effective than one 30-minute message in January. Your only real requirement is to make sure the content is compelling and to the point, and the messages reinforce one another through repetition.

## 5. Start leveraging simple behavior change principles in your messaging

Last but perhaps most important of all, to be truly effective, compliance programs must take behavior change principles into account, not only to change employee behavior in the near term, but to change employee attitudes about compliance that will determine their behaviors in the long run. By starting to leverage some simple, proven methodologies, you will be able to influence employees to act in desired ways - and to create dramatic, lasting behavior change. Here are just a few examples of relevant behavior change principles:

- *Avoiding Pain/Gaining Pleasure* – Humans (like all animals) are "programmed" to act in ways that minimize pain and maximize pleasure. As a result, they change unconstructive (or destructive) behaviors only when they associate more pleasure with changing than with staying on their current path. If employees are consistently shown both the negative consequences of non-compliance (e.g., punishment, loss of status) and the positive results of successfully resolving the compliance issue at hand (relief from anxiety, social approval, satisfaction), they begin to quite

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[1] If you'd like me to send you some simple communications planning templates that might be helpful in thinking through your plan, email me at jrogers@compliancewave.com

automatically associate pain with non-compliance and pleasure with compliance.

- *Commitment and Consistency* - Once employees make small commitments, it becomes much easier for them to make larger ones that are consistent with their initial commitments. This aspect of human psychology is well established. One way you can apply this principle is by delivering compliance content to employees and then immediately eliciting simple, explicit, and actionable commitments from them (E.g. "If I am approached for a bribe, I will contact the Compliance Office." Collect e-signatures – or even ink signatures on a simple paper form with this sentence on it). An added benefit of this strategy is that you will be creating a defensible record of ongoing compliance communications.

- *Repetition* – Constant repetition is essential to information retention and behavior change. Repetition of messages and actions causes the brain to be "rewired," allowing old habits to be broken and new habits to form. Interactive communications that repeat messages in new and dynamic ways are particularly effective in spurring behavior change.

Although I don't have the space for detailed explanations here, there are several other methodologies in this arena that are worth incorporating into your compliance communications program. The key point is that compliance communications must focus on fostering a change in *behavior*, not just a change in what employees know. [2]

## Conclusion

In summary, there are simple, concrete steps you can take right now to reanimate your compliance communications. First, be willing to lessen your reliance on traditional

e-learning formats. Look for new channels of communication outside of the tried and true. Map out a plan of attack by targeting specific communications vehicles, becoming knowledgeable about how they work, and using them on a regular basis. Break your messages into quick, memorable learning bursts. And, work to incorporate behavior change principles into all of your communications. You'll make your compliance program more effective, reduce the time and cost required for the program, and, best of all, garner increased employee commitment over the long term.

## Why "Waves"?

We know from Marketing and Advertising experts that it takes between 9 and 21 "impressions" before a consumer is ready to buy. This is a significant indicator of how challenging it can be to elicit behavior change (even when that consumer *wants* to buy in the first place!).

For Compliance Professionals (and their partners in HR, Learning & Development, and Corporate Communications), using multiple modes of communication—over multiple channels--to reinforce your core training and policy efforts is essential to guiding the employee toward compliant behavior and ultimately allowing you to better defend your program.

"Waves" of crisp, memorable, and topical communication let you deliver messages that are easy to deploy, easy to absorb, and fortify your core training and policy efforts.

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[2] If this interests you, email me at jrogers@compliancewave.com for a copy of my whitepaper *How the Science of Behavior Change can Dramatically Increase the Effectiveness of your Compliance Program*