

Compliance Champions Considerations Checklist

Here are some considerations for creating and maintaining an effective Compliance Champions program. Use this checklist to help plan, maintain, or refresh a successful program.

How are the Champions chosen?

- Self-selected
- Nominated by a manager/head of region or business unit
- Voluntold

How are the Champions incentivized?

- Cash payments/bonuses
- Salary bumps for taking on the role
- Recognition events with senior management (*e.g.*, an annual luncheon with the CEO for the Champions)
- An award (*e.g.*, Compliance Ambassador of the Year)
- Recognition in the organization by way of interviews/blog posts/celebrations
- Training in broad-based skill building like public presentation

What do the Compliance Champions do?

Formal tasks may include:

- Participating in the risk assessment process
- Giving live training
- Passing on communications within the group
- Cascading policies and toolkits
- Participating in or leading investigations
- Running portions of Compliance and Ethics Week, like games
- Attending training sessions and meetings of the Compliance Champions
- Providing feedback on policies or training prior to its deployment
- Assisting in the translation of policies, procedures, or training

- Chasing people within the department or business unit who have not completed their training on time
- Sending numbers/metrics to assist in the monitoring of the program

Informal tasks can be very important. These may include:

- Being the “eyes and ears” of the Compliance Department on the ground
- Comprehending red flags such that they can report concerns easily to the Compliance team
- Being a trusted resource for employees who don’t understand the program or policies
- Being a place for employees to report concerns of misconduct
- Being an extension of the compliance program to show strength in numbers

How do you kick-off the program?

- Bring in outside counsel to talk about scandals or war stories that relate to compliance meltdowns
- Hold a skills-building workshop (investigations, public presentation, writing)
- Bring in a branding expert to help people create their personal brands
- Train on laws affecting the company in an entertaining, story-based way
- Use the Compliance Competitor business simulation game with the teams
- Hold a raffle for prizes
- Perform a brainstorming session about interesting ways to communicate policies, procedures, and the Code
- Bring in senior leaders to talk to the group and tell them how important they are
- Hold a getting to know you networking session with all of the Compliance Champions to build cohesion and a stronger network in the company
- Give an award celebrating someone who has been very strong in compliance or ethical behavior at the company
- Take the afternoon off to a fun location for team building (*e.g.*, rounds of mini-golf, an amusement park)
- Attend a local sporting event
- Attend a performance/musical/play/comedy event

How do you keep people involved?

- Updating the Champions on new laws or policies that will affect the company or their unit
- Sharing investigations data/stories as much as possible
- Highlighting one individual each meeting – sharing facts about the person’s life and interests
- Continuing skill building
- Further exposure to senior leaders
- Having an annual award for one or more of the Champions
- Going to a nice dinner
- Having a company-sponsored happy hour at the end of the event
- Having a sharing session where Champions discuss their:
 - Concerns
 - Areas of confusion
 - Best practices
 - Wins

Is the role on top of the day job?

- Yes, and there is not formal consideration about how much time this commitment may take away from their day job
- Yes, but there is formal consideration and understanding that this commitment will take time away from their day job

Do you set formal goals and performance reviews?

- Yes
- No

How often are the Champions changed out?

- A specific cadence (*e.g.*, every two, three, or five years)
- Only when there is a new unit/function/region opened
- When someone quits/retires/otherwise leaves

- When the Champion themselves determines that their tenure has been long enough and chooses to leave

Checklist of Information for the Compliance Champions Program Charter. Charter includes:

- The structure of the program
- The leadership of the program
- How the program is managed
- How people are selected for the program
- The major job duties and tasks of the Champions
- How often (at minimum) the group meets