

Guide for Building and Sustaining an Effective Champion Program



Developed by and for the
Business Ethics Leadership Alliance

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Acknowledgements

We would like to thank the members of our Business Ethics Leadership Alliance (BELA) Compliance & Data Privacy Working Group for their insights and knowledge in developing this Guide. Each Working Group member has invested considerable time in the review process and feedback loops to help create practical material that can broadly support the goals and actions of global compliance teams and their extended champion networks.

The Guide is not designed to be static. With ongoing input on how we can improve the information to meet new criteria and shape the supporting materials, the Working Group will remain a key resource. Through ongoing discussions and analysis, this collection of leaders will enable us to respond to shifting visions and emerging practices that can best support peers across the BELA community.

Specifically, we would like to thank the following Compliance & Data Privacy Working Group Members:

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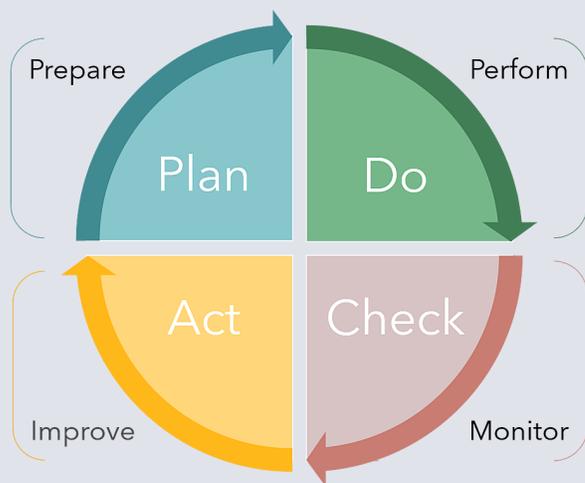
Introduction

This Guide is written for the manager in charge of developing and implementing a Champion Program. It contains a thorough checklist of what you – the Program Leader – need to do and links to resources that you can customize and use in your Champion Program. The Guide also includes materials you can use to train your Champions, as well as guidance and materials to help them excel in their role.

The focus of this Guide is building and sustaining an effective Champion Program regardless of the specific compliance issue you are seeking to address. The guidance, checklists, and materials are designed to be applicable to any issue. In each section, we have included special considerations for the following specific issues:

- Data Privacy
- Anti-Bribery and Corruption
- Information Governance
- Environmental, Social & Governance (ESG)

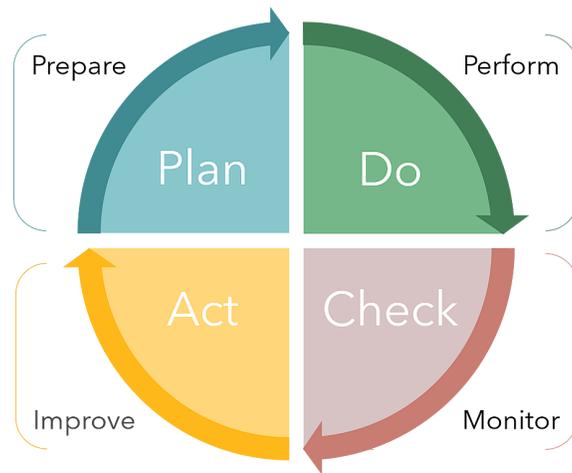
An effective Champion Program must embrace the philosophy of continual improvement because the challenges are always evolving, there are always new people in your company, and the Champions themselves are always changing. The continual improvement framework of **Plan-Do-Check-Act** is the basis for organizing this guide.



Click on the Plan-Do-Check-Act links in the footer of any page to get to any step at any point in the document.

Given the unprecedented situation created by the global COVID-19 pandemic, we have included special considerations for the role of Champions in the remote workplace and the hybrid office/remote workplace.

Regardless of whether your company calls them Advocates or Liaisons or Champions, these people play a critical role in embedding compliance into how your company operates and creating a culture of compliance.



PLAN

Planning is the critical first step, but don't make the mistake of over-planning. No matter how thorough your initial plan is, accept the fact that it will evolve when put into action. That's the point of the Plan-Do-Check-Act cycle of continual improvement.

Here we provide guidance to walk you through the planning process and links to resources you can use to build your own Champion Program.

Champion Program Overview

Review the points below and then use the resource to define your Champion Program. We have provided a resource that covers all of the points in the Plan stage. You can use it to build your Champion Program plan to present to Senior Management for approval.



[Access the slide deck with additional resources and templates for Stage 1: PLAN](#)

Purpose

To broadly raise awareness of the compliance issue, influence the behavior of the people and the culture of the organization, and help embed compliance in how people do their jobs.

Tip: As you develop your overview, be specific about the compliance issue(s) and how the Champion Program will support your company’s mission and code of conduct.

Scope

Ideally there is a Champion in each major functional department and each geographic location.

Tip: It may make sense to start with a pilot program in certain high-risk departments or locations and go through the Plan-Do-Check-Act (PDCA) cycle with the pilot. You can learn from the pilot and then scale the Champion Program.

Champion Program Overview (continued)

Risks to Manage

Your Champion Program will be more effective if it is clear about what risks are most important to address. Risks that are common to all issues include:

- Lack of awareness of the issue and its importance to the company
- Lack of employees knowing their role and responsibility
- Lack of visible commitment by senior and middle managers
- Policies and procedures from HQ that are impractical
- Siloed compliance function
- Existence of a “work-around” culture
- Special risks related to remote work

Tip: Look at the Special Considerations at the end of this section for typical risks for each compliance issue.

Core Functions for the Program

- Support the compliance staff
- Cascade the training using a train-the-trainer approach
- Create a feedback loop from the departments and locations to the Program Leader
- Localize the policies, procedures, and communications based on risks and conditions
- Expand the network of committed executives

Your Role as the Champion Program Leader

Your role is to manage the Program through the Plan-Do-Check-Act cycle of continual improvement. Here is a checklist of some specific tasks along the way.

- Define the Champion's role and responsibility
- Understand what needs to be global for consistency and what needs to be localized for effectiveness
- Establish the Champion Program metrics
- Obtain Senior Management support and approvals
- Engage the Senior Leaders in each function or location
- Recruit, select, and train the Champions
- Develop the "master" training materials for the Champion to localize and use
- Monitor the Program
- Modify the Program based on feedback
- Report to Senior Management on the Program's effectiveness

Your Role as a Champion

Being a Champion is not a major time commitment, but ideally it is something that is recognized as part of the Champion's job responsibility. The amount of time required will vary week to week, but try to scope their role so it will not exceed one hour per week on average. Of course, in part the amount of time depends on how much their Champion role overlaps with their job.

- Conduct training on the related issue in their sphere of influence
- Assess the compliance risk based on the function and location
- Localize policies, procedures, and training with their leadership and you, the Program Leader
- Track local regulations and conditions
- Monitor adherence to policies and related behavior
- Act as the primary "point person" for questions
- Build awareness for how and where to report a concern
- Report on implementation to:
 - You (Champion Program Leader)
 - Senior Leader in their department/location
- Lead by example to showcase the desired behavior

Company Examples

Here is an example from BELA member company Eaton showing how the role of Data Privacy and Protection (DPP) Champion is defined.



The following four images from BELA member company Teradata show how they defined the role of the Champion to the various audiences in their organization.

Responsibilities to Teradata

- Be familiar with Teradata's Code of Conduct and Ethics & Compliance (E&C) program
- Raise awareness of the E&C program within the company
- Raise the profile of "ethics" and ensure it is part of the fabric of Teradata's transformational journey

WE RISE AS ONE!
WELCOME TO THE NEW TERADATA

Responsibilities to Employees

- Be a role model and lead by example
- Encourage employees to speak up whenever they have questions/concerns
- Direct employees to appropriate policies and procedures
- Facilitate roundtable discussions on Ethics issues with employees



Responsibilities to the E&C Department

- Act as a communication conduit between the E&C Department and the business:
 - Contact new employees within the Advocate's business unit to ensure the employee understands Teradata's commitment to ethics and compliance and is acquainted with Teradata's E&C office and resources
 - Promote E&C communications and initiatives, regularly share the messages within the framework of their business group (e.g., staff meetings)
 - Direct employees to the E&C office with questions or concerns
 - Facilitate completion of Code of Conduct training for new hires
 - Bridge cultural and language barriers



Responsibilities to the E&C Department cont'd

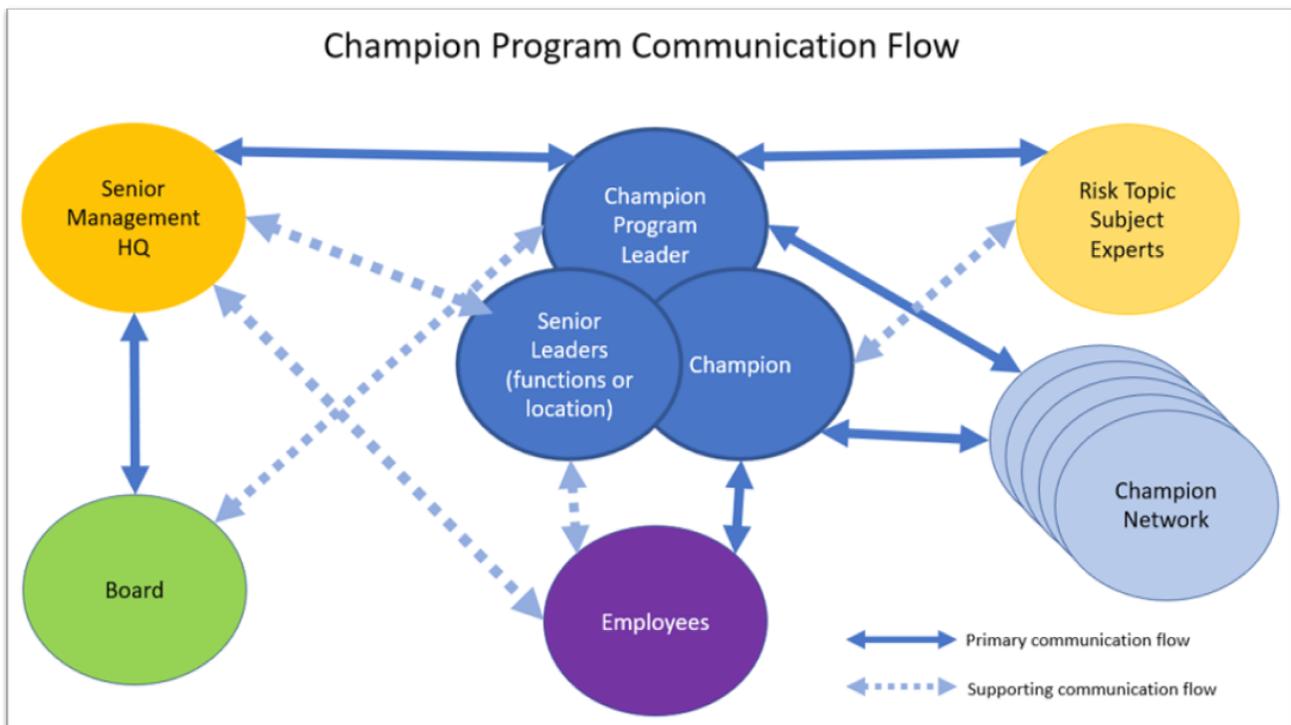
- Assist the E&C Department in understanding the organizational structure of their line of business, major areas of exposure, and topics of interest to the business
- Identify opportunities within the business to train employees, make presentations, or otherwise engage on ethics and compliance
- Provide feedback on effectiveness of training and communications
- Attend quarterly conference calls with E&C Department to share feedback and align messaging
- **Ethics Advocates should NOT:** conduct intake evaluations for ethical concerns; act as an advisor/counselor for ethical issues; make determinations/evaluations as to what constitutes a reportable ethical issue; conduct investigations; these remain the responsibility of the E&C Department

Champion Program Structure

Review the points in this section and then [use the resources and templates for stage one](#) to structure your Champion Program.

Tip: An effective Champion Program has three legs (like a stool): Senior Leader, Champion, and you (Champion Program Leader).

Establishing open two-way communication channels is one of the goals of a Champion Program – and a hallmark of an effective program. Here’s a diagram showing the ideal communication flow.



- Identify the position type and level for the Champions – they need to be senior enough to have access and authority in their sphere
- Identify the appropriate Senior Leader in each function or location
- Determine the number of Champions
 - Locations – corporate HQ, regions, countries – starting with high risk
 - Function (department) – ultimately you need cross-functional support, but you can start with high-risk functions and functions core to the addressing the related compliance issue

Tip: Within a department, think about the specific compliance issues raised by the function of the department.

- Determine the level of commitment needed from the Champions

Tip: This will be needed to get approval to roll out the Program.

- Duration of the Champion role – suggested duration is two years, as this allows enough time to become comfortable with the role; rotating the role helps to create even more awareness as new people become Champions.

Here is an example of how BELA member company Royal Caribbean Cruise Lines structured their Champion Program with a strong emphasis on cross-functional involvement.

C&E Group will Lead and Initiate a Network for Compliance & Ethics ("LINC") to achieve its goals for continuous program improvement. LINC will leverage existing resources within the Company to create a network of partners. The LINC process consists of three phases.

Phase I

Create Compliance & Ethics Working Group

- Led by C&E Director
- Cross-disciplined members (Audit, Global Security, Human Resources, Legal, International and Pullmantur)
- Sounding board for the LINC process
- Provide input on C&E activities

Phase II

Document existing compliance functions and support

- Meet with Departmental leaders and other appropriate personnel
- Map compliance functions and/or support by Departments
- Identify opportunities for leveraging resources and creating economies of scale

Phase III

Link Departments to C&E Group

- Appoint C&E liaisons within appropriate Departments
- Formalize reporting process on compliance
- Create C&E Program Charter



DIAGRAM KEY

- C&E Group / Working Group
- Provides Compliance Function(s)
- Provides Compliance Function(s) and Support

Criteria for Selecting Champions

Here are some guidelines for selecting an effective Champion. Some companies decide to identify possible candidates and then see if they want to become a Champion. Some companies go through an open application process and let people apply to be Champions. There is no "right" way. What is best for your company may be based on the scope of your Champion Program and the number of potentially qualified candidates.

Regardless of whether you choose "selection" or "application," you need to establish criteria. Here's a list to get you thinking. (In Stage 2, we include resources you can use to announce your Program and recruit Champions.)

- Able to effectively communicate and influence behavior – most important attribute
- Familiar with the issue's subject matter – deep expertise not needed
- Familiar with local culture and issues
- Understand related legal issues – but does not need to be a lawyer
- Able to understand and bridge the operating needs of the company with compliance requirements
- Practical problem solver
- Empathy for people trying to do their job and meet compliance expectations

Who Should Be a Compliance Champion

When establishing a Compliance Champion network, it should be representative of your company's operations – functionally, geographically, and with a particular focus on areas where risk may be higher based on responsibilities or where resources are often needed to support implementation of various initiatives.

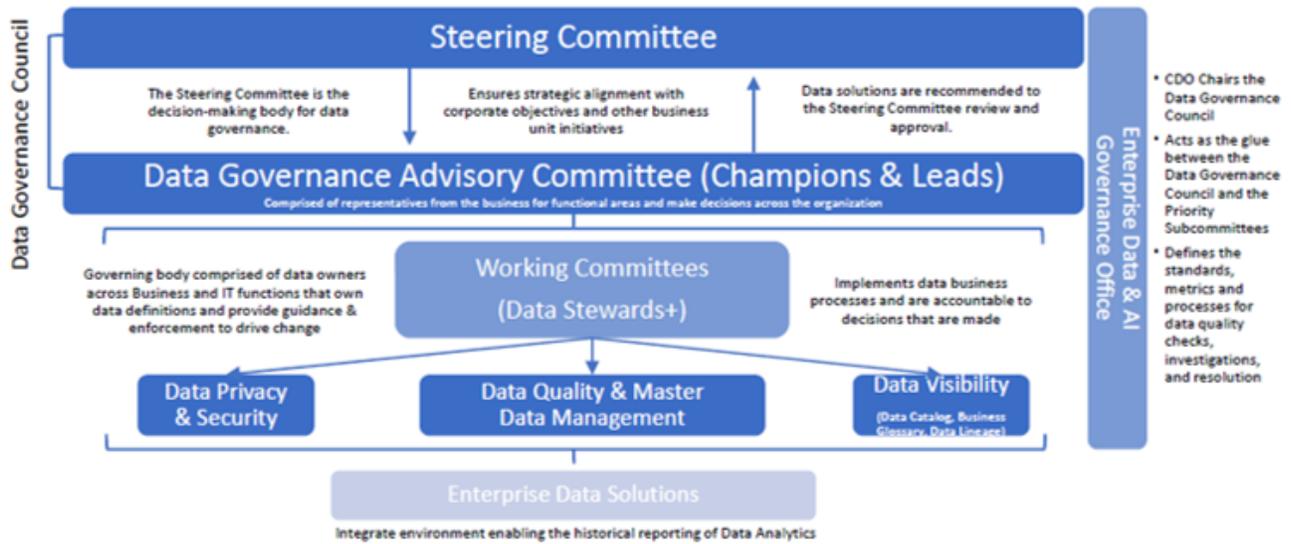
- Cross-section of all primary departments (for example, Operations, Finance, Human Resources, Information Technology, Legal, Marketing)
- Individuals with a sufficient level of decision-making authority, with exposure to Senior Leadership and the ability to coordinate and deploy related resources

Tip: In some organizations, these may be Senior Managers or Directors; in others, they could be Vice Presidents or similar. Generally, Senior Vice Presidents and above should assist in overseeing the related program from a governance perspective as "Senior Leaders" but would not be leveraged as Champions.

- Individuals with strong business or practice acumen and the ability to understand the implications of legal requirements and risks on the company's operations
- Individuals with a high degree of engagement and responsiveness
- Individuals demonstrating exemplary ethical conduct and positive company cultural behaviors
- Individuals familiar with local cultures and practices
- Individuals with a strong ability to innovate, influence, and help overcome "roadblocks" to facilitate process enhancements

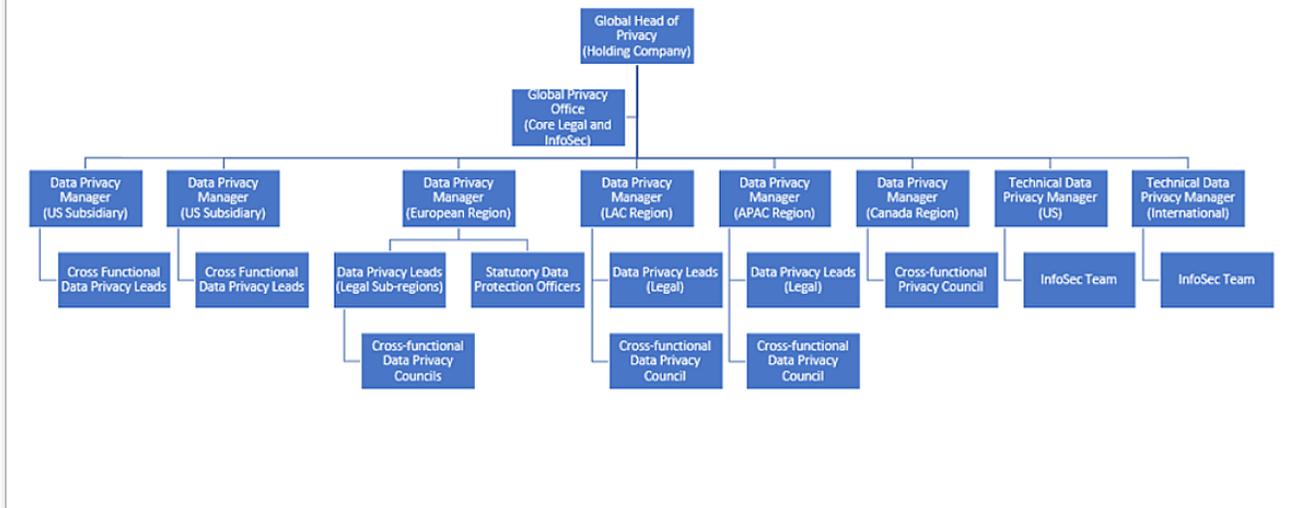
Here are two examples of how BELA member companies structured their Champion Program related to data privacy and integrated the Champions into the organizational structure. The first example is from Royal Caribbean Cruise Lines and the second is from FedEx.

Data Governance Framework Operating Structure



1

Example of Privacy Governance in Large Multinational Corporation



Special Considerations in Champion Selection for Specific Topics

Where a Champion program is focused on a particular topic, additional factors should be considered, such as those below, to ensure the Champions are best equipped to support the success of the program.

Data Privacy

- Involvement in database marketing or working with any third-party activities requiring permissions
- Familiarity with analytics functions that require input from employee or customer personal data sources
- Knowledge of basic elements of more stringent and detailed privacy laws (e.g.: GDPR, CCPA)
- Experience in appropriately securing personal information under data privacy laws
- Knowledge of the primary data privacy risks your company faces

Anti-Corruption

- Knowledge of geographic locations that are higher risk according to established country risk rankings (example: [Corruption Perception Index](#) ranking from Transparency International)
- Familiarity with corruption risks of higher risk business operations (e.g. business development, sales, procurement, obtaining licenses and permits)
- Experience with, or knowledge of, basic accounting and financial controls for managing disbursements
- Familiarity with how third-parties are screened, selected and on-boarded
- Knowledge of the primary corruption risks your company faces

Special Considerations in Champion Selection for Specific Topics (continued)

Information Governance

- Familiarity with your company's information architecture and processes
- Experience in "record intensive" company functions
- Knowledge of the data classification and policies and procedures at your company
- Experience with administering information repositories (ex: SharePoint, OneDrive, Box)
- Experience in appropriately securing confidential information

ESG

- Knowledge of the basic elements of environmental and social responsibility
- Familiarity with how your company manages facilities and/or property
- Individuals involved in the company's initiatives
- Familiarity with your company's diversity, charitable or community-based initiatives
- Knowledge of the ESG issues and risks involved in the company's procurement and supply chain management
- Knowledge of general environmental and social risks your company faces

Special Considerations for Remote Workers

Maintaining a culture of compliance when many people are working from home has unique challenges. The challenge is building a cohesive compliance culture when your entire workforce may be spread between homes and offices.

Throughout this Guide, we offer tips for getting your remote workforce to understand the importance of compliance and to commit to it under challenging and sometimes unfamiliar working conditions.

Now more than ever, every organization needs to have a designated Champion. Employees need to know who to turn to with questions or concerns about compliance.

But beyond responding to questions and influencing how people behave when working remotely, the Champion needs to understand how people are reacting to this new working environment. There may be fatigue from the blurred line between work life and personal life. Employees may be juggling their work with new child care or schooling challenges. In addition, there may be business pressures that lead to taking shortcuts or bending the rules.

Ethisphere is a supporter of The Cyber Readiness Institute (CRI). Here are a few of CRI's resources to support a remote workforce.

[Data Protection Basics for Remote Workers](#)



[Tips for a Cyber Ready Remote Workforce](#)



- 1 Focus on changing one behavior at a time with a monthly cyber readiness theme.** Prioritize one behavior - like strong passwords/passphrases - to change or reinforce and make it the monthly cyber readiness theme. Provide the necessary training so employees know what to do and how to do it. This approach is especially important if you are introducing new technology (like cloud-based file-sharing, VPN, etc.) or allowing workers to use a combination of company-issued and personal devices while working remotely.
- 2 Update your cyber readiness policies and procedures for remote work,** as needed. You can conduct this update in alignment with your monthly behavior to change. Make sure to incorporate any new technologies that were introduced in the shift to remote work into the policies and procedures. It is important that your policies and procedures are aligned with how your employees need to operate remotely, otherwise you run the risk of creating a "work-around" culture.
- 3 Send a short weekly alert to highlight new cyber threats and reinforce the importance of cyber readiness.** This alert should come from the Cyber Leader and other senior managers. It's important to visibly show ongoing senior management commitment. A remote work environment will perpetuate an increase in certain types of threats and vulnerabilities and it is important to keep your workforce informed.
- 4 Hold a weekly 30-minute Cyber Readiness video meeting to share good practices** for remote work and answer any questions. Use video conferencing to build a community of cyber ready remote workers. It is important to find ways to build and maintain a sense of community with a remote workforce. Make it a lunch meeting or virtual Happy Hour.
- 5 Hold a friendly competition for Cyber Readiness Star of the Month** with a video conference "Awards Ceremony." Tie the topic to the monthly cyber readiness theme.

Performance and ROI Metrics

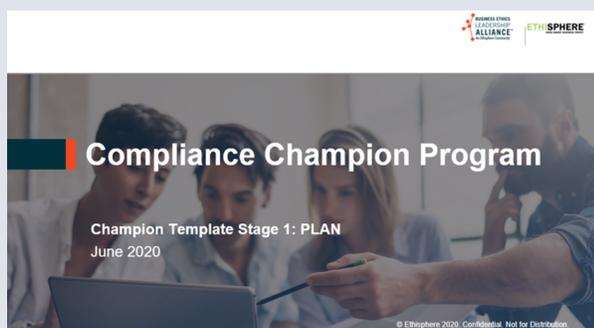
It's important to have some metrics for the Champion Program. It will help you measure and communicate its effectiveness. Metrics are important to PDCA and continual improvement, because you can't improve what you don't measure. These metrics will show shared success between the Champion Program Leader, the Champion and their Senior Leader – and how the company has benefited.

- X% increase in people in the Champion's sphere completing and passing the related training
- X% of employees aware of key policies and procedures
- X% of employees aware of how to raise questions, concerns, or suggestions
- Improvement projects completed utilizing the Champion network
- Compliance program materials or trainings have been localized (for example, language, culture, or practices)

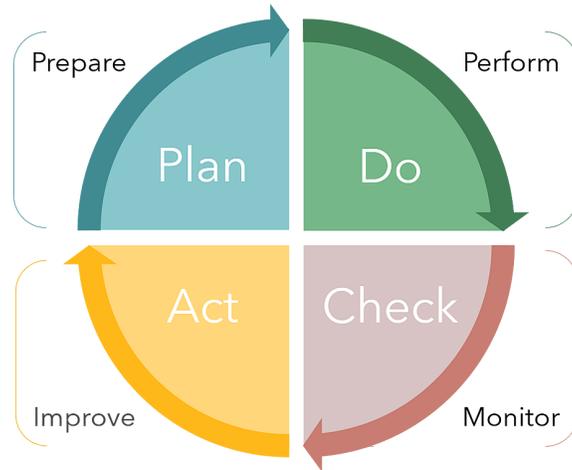
Approvals

The final step in the Plan stage is to get the necessary approvals so you can spring into action. It is important to get approvals and "buy-in" from Senior Management at the corporate level and from Senior Leaders in each function or location. You can use the resources referenced in this guide to build a presentation to Senior Management. Once you get their approval, you can use the presentation to introduce the Champion Program to the Senior Leaders in the functions and regional/local offices.

Tip: Keep it simple. Identify the specific benefits to each audience you are seeking approval from. Build momentum during the planning stage by getting cross-functional input. As you scope the initial roll-out, target departments and locations that will be receptive.



[Access the slide deck with additional resources and templates for Stage 1: PLAN](#)



DO

The planning is over. It's time to start the roll-out and "Do." The key actions are to announce the Champion Program, select and train the Champions, and get the Champions going.

Introduction: Do

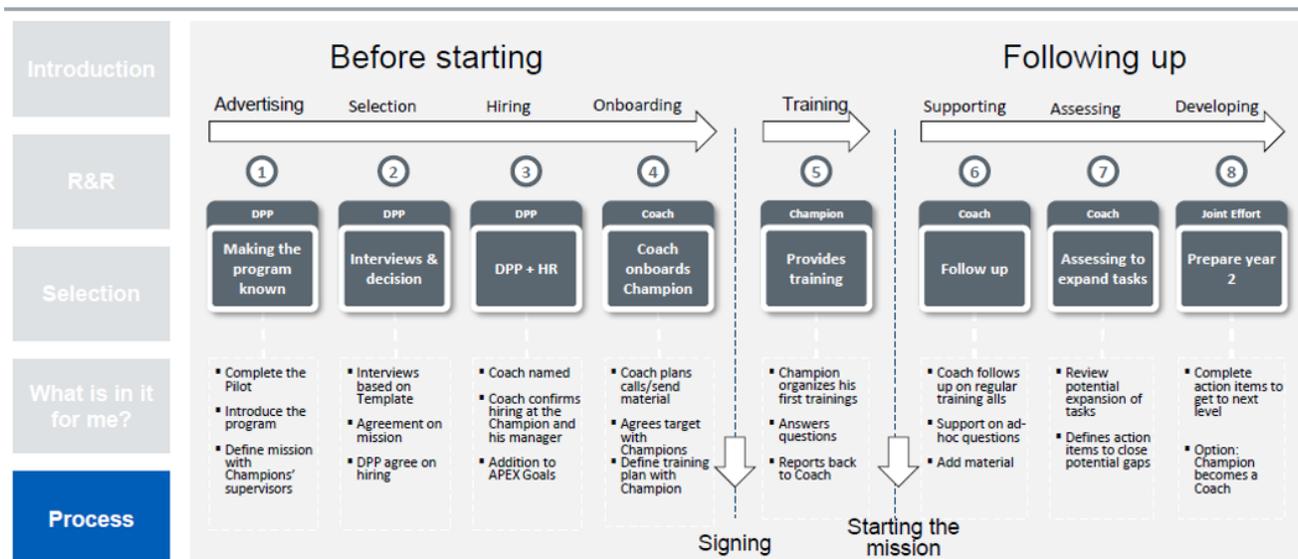
In this section, we provide guidance to walk you through the Do stage with links to resources you can use to implement your own Champion Program. It is important to clearly differentiate between how you train the Champions (train-the-trainer) and how the Champions train the people in their sphere.

Our guidance is directly targeted for you to “select” the Champions, but it can be adapted if you choose to have people “apply” to be Champions .

Tip: When you are starting your Champion Program, it probably makes more sense to select people. You can switch to an application process once the program is established.

From BELA member company Eaton, here is the workflow and timeline for launching their Champion Program.

Deployment Plan



Select the Champions

The first step is to let the appropriate people know you are launching a Champion Program and looking for Champions. How you position and announce the Champion Program has a big impact on its ultimate success. It is important to think about “what’s in it” for the Champion, their direct managers, and Senior Leaders in their function or location. Keep in mind that the goal of the Champion Program is to embed compliance into how each function and location operates. The Senior Leaders play a key role in its success – and they benefit from the results.

Senior Leaders in each department or location should have a good idea of who would be an effective Champion. Get their input. The Champions need to be respected and trusted in the eyes of their peers.

Also, within the scope of your program, select Champions at all appropriate organization levels, in each function, and in each geographic region. The number of Champions is up to you, but it is important to ultimately cover appropriate levels, functions, and locations. Remember, you may want to start with a pilot and then expand the Program.

Tip: Make sure to feature Senior Management support from headquarters in your announcement. Consider having the announcement come from the CEO or a senior executive, or using quotes from them.

Here are two sample documents to help you get the word out:

- A communication to the Senior Leaders introducing the program and asking for their support in identifying the right candidates
- An attachment for the Senior Leader to forward to the candidates explaining the program, their role, and the benefits to them

Access the
communication
examples

Train the Champions

Once the Champions have been selected, the next step is to provide them with training. You can think of training the Champions as a “train-the-trainer” program because they will be cascading your message in their sphere.

Here’s an outline and a resource for you to use on how to structure effective Champion training. As you’ll see from the outline, most of the Champion training program is applicable to any topic, but this is one area where additional training is needed based on the Program’s specific topics. You will need to tailor some of the material to your company, your risks and the specific timing for your Champion Program.

Champion Training Material Outline

- Goal of the Champion Program
- Their overall role
- Benefits to them and the company
- Training on the specific topic (pull out section the Champion can use to train others)
- Their authority (and its limitations)
- Their responsibilities
- Special considerations for remote work
- Reporting to their management and Champion Program Leader
- How to excel as a Champion
- Intro to their communication kit (pull out section the Champion can use)



[Access the Champion Training Program resource slide deck](#)

The Champion training needs to educate Champions about their role and responsibilities, but it also needs to give guidance on the limits to their role and authority. Here's an example of how BELA member company Teradata communicates the limits to their Champions.

Ethics Advocates should NOT

- The job of Ethics Advocates is NOT to:
 - ⊗ intake evaluations for ethical concerns
 - ⊗ act as an advisor/counselor for ethical issue
 - ⊗ make determinations/evaluations as to what constitutes a reportable ethical issue,
 - ⊗ conduct investigations
- The Ethics & Compliance teams remains solely responsible for these activities

Special Considerations in Champion Training for Specific Topics

Where a Champions program is focused on a particular topic, the training to the Champion and from the Champion to the employees in their sphere needs to be tailored.

Data Privacy

- Review of relevant laws and regulations (e.g. GDPR, CCPA)
- Understand the principles behind the laws Operational requirements to comply with the data privacy laws
- What are considered “reasonable steps” in data privacy
- Relationship of information governance to data privacy and cybersecurity
- How to assess risk in the Champion’s sphere

Anti-Corruption

- Review of relevant laws and regulations (e.g. U.S. Foreign Corrupt Practices Act, UK Bribery Act)
- Overview of third-party risk management (e.g. due diligence, selection, on-boarding, monitoring)
- Use of scenario’s to make anti-corruption training effective Basic definitions of bribery, “anything of value”, government official, etc.
- Importance of effective reporting channels
- How to assess risk in the Champion’s sphere

Special Considerations in Champion Training for Specific Topics (continued)

Where a Champions program is focused on a particular topic, the training to the Champion and from the Champion to the employees in their sphere needs to be tailored.

Information Governance

- Review of relevant industry-specific laws, regulations or industry-standards (e.g. Health Insurance Portability and Accountability Act,
- Overview of the company's information governance program
- Introduction to principles of information governance
- Overview of data classification and access control
- Relationship of information governance to data privacy and cybersecurity
- How to assess risk in the Champion's sphere

ESG

- Review of relevant laws, regulations and standards (e.g. UN Global Compact, Equator Principles)
- Practical definition of ESG
- Current issues in ESG - globally and regionally
- Importance of stakeholder engagement
- Role of ESG rating agencies
- How to assess risk in the Champion's sphere

Champion Communication Kit

You want to make sure that there is a consistent message coming from you to the Champions and from the Champions to the employees in their sphere. Providing the Champions with a communication kit is an efficient way to accomplish this. We designed the Champion training to include the following elements that the Champions can extract and use to train their employees and communicate about the compliance program:

- Introductory Awareness Training
- FAQs
- Reporting Concerns

You need to make sure that your Champions are prepared to answer questions and can provide clear guidance on how to report a concern.

The [Communication Kit](#) you provide them makes it easier for them – and it helps you ensure consistency throughout your organization.

Here is an example of how BELA member company Teradata communicates the various ways that employees can report a concern or get more information.

Report Concerns or Ask Questions

Teradata associates may contact any of the following resources at any time if they have an ethical question or concern:

- o Direct manager or other member of Teradata's leadership
- o Any member of the Teradata Human Resources Department
- o Any attorney in the Teradata Law Department
- o The Ethics & Compliance Office via email at [REDACTED] or via the **Teradata Ethics Helpline** at +1-866-455-0993 or online at [https://\[REDACTED\]](https://[REDACTED]) The Ethics Helpline allows for confidential and anonymous reporting where permitted by law.
- o For **physical security** concerns, contact Global Teradata Corporate Security at [Teradata.SAFE@\[REDACTED\]](mailto:Teradata.SAFE@[REDACTED])
- o To report an actual or potential **data security event**, email [REDACTED]



Additional Resources

- Visit the **Ethics & Compliance Sharepoint site** at: [https://terad\[REDACTED\]](https://terad[REDACTED])
- **Corporate Policies** located at: [http://teradatane\[REDACTED\]](http://teradatane[REDACTED])
- **Teradata Law Department:** [REDACTED]
- **Contact HR** at: [REDACTED]
- For **Open Source** compliance questions, visit: [ht\[REDACTED\]](ht[REDACTED])



Champion Communication Ideas

In addition to the formal training, it is important to frequently communicate about compliance topics to build and maintain awareness. This is true for your communications to Champions and for Champions' communications to employees in their sphere. Here are some methods that have proven to be effective:

- Regular column in the company newsletter
- Posters
- Postcards
- Email templates
- Screensavers
- Micro-learning modules (60-90 second audio or video)
- Monthly compliance days
- Hand-out on myths and realities about reporting concerns

Here are some tips for how you can build an effective communication program that is consistently implemented. For maximum efficiency, design your communications to the Champions so they can reuse them to communicate within their sphere.

- Provide the Champions with the communication materials so there is a consistent message – make sure that the materials are aligned with the corporate graphic standards (e.g., colors, typeface, communication style)

Tip: Reach out to your Communications or Marketing department for help, if you can.

- Provide the Champions with a timeline so there is a consistent frequency

Tip: We recommend a short communication at least once a month and a larger communication each quarter.

- Give the Champions the flexibility to use different communication

Here's an example of how BELA member company JLL plans their communication and incorporates compliance messages into routine meetings.

Newsletters

Our Ethics Newsletters are published monthly, distributed to the Ethics Liaisons, and cascaded to colleagues globally. Our newsletters are put in Poppulo, which allows us to measure and track our communications.

Our newsletters cover a variety of topics and include links to the case study of the month and an ethics video.

2019 Ethics Liaison Newsletters	
Newsletter	Topic
January	Ethical Leadership
February	Accurate Books & Records
March	Code of Conduct Awareness
April	Respecting Others
May	Employee Fraud: Misuse of Company Resources
June	Harassment & Discrimination
July	Anti-Money Laundering
August	Reporting Ethical Violations
September	Confidentiality
October	Conflicts of Interest
November	Reporting Misconduct
December	Gifts & Entertainment



Ethics Moments



In 2019, our Ethics Liaisons began incorporating **Ethics Moments** into meetings and presentations. Our Liaisons can download and share the Ethics Moments with colleagues to provide training and enhance awareness around ethics.

Ethics Moment

Reporting Ethical Violations

What would you do if you observed a supervisor harassing a colleague? Would you keep quiet to avoid trouble with your boss or would you report the incident? What if you suspected a colleague was altering reports to make JLL look more favorable to the client? What would you do? Do you ignore the problem and look the other way?

In both cases, action should be taken. **JLL's Code of Business Ethics** requires all employees to report any suspected or observed wrongdoing. When we fail to report issues like this we may think we are protecting our co-workers, JLL, or ourselves. In fact, we are putting JLL's assets and our reputation at greater risk.



Reports may be made to your manager, an Ethics Officer, Human Resources, online at <https://www.jll.com/ethicsreport> or by calling our 24-hour Ethics Worldwide Helpline at 1 877 540 5006

Special Considerations for Remote Workers

Many companies now have a substantial number of remote workers or hybrid remote/office workers. Communication is one area where your methods will need to be adapted to the remote/office hybrid workplace. Building and maintaining culture in this environment requires new ways of communicating.

The Champions play a critical role in cascading and personalizing the compliance message. They need to become the face and voice of the compliance message to the people in their sphere that are working remotely. Here are some remote work tips for your Champions:

- Start each virtual meeting with one minute on compliance – tell a story, provide a statistic, or give a tip
- Pick a monthly sub-theme within the overall compliance topic (e.g., within anti-corruption it could be entertainment for one month, then charitable contributions; within data protection it could be the use of central file sharing for one month, then use of personal devices)
- Proactively send a regular email asking employees how they are doing and if they have any questions or concerns about the compliance topic



Communication piece from The Cyber Readiness Institute on [Do's and Don'ts for Remote Workers as a reminder of smart practices when working online](#)

Establish Baseline Performance Metrics

You want to be able to report on the Champion Program's impact, and in order to report on improvement, you have to establish a baseline. Before the Champion launches their local training and awareness program, you need to establish a baseline so you can capture all of the impact.

Refer back to the Performance Metrics from your Planning stage. Usually it is your role, as the Champion Program Leader, to collect and manage the metrics.

Depending on the current maturity of your compliance program, you may already have many of these metrics. For example, if you have been doing compliance training, you may know the percentage of people passing the related quiz or test. Check within your company for any existing baseline statistics.

If you are starting from scratch, we suggest adding the following three questions into your company's existing culture survey. If none exist, we suggest starting with a very short survey – as little as the questions below.

Unless otherwise noted, 1 indicates "completely unaware" and 5 indicates "extremely aware."

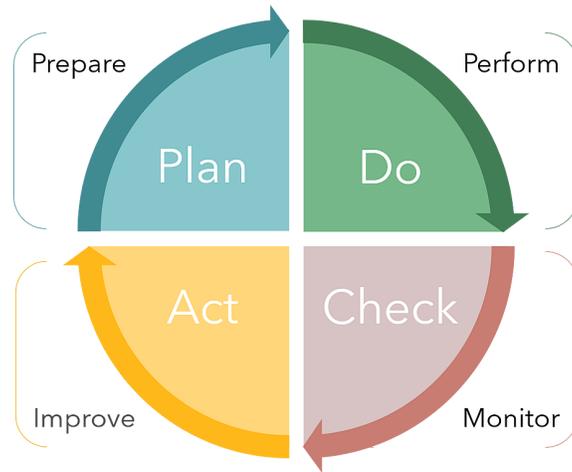
- On a 1-5 scale: Rate your awareness of the specific elements of the policies and procedures related to [the specific compliance topic].
- On a 1-5 scale: Are you aware of how to access the policies and procedures related to [the specific compliance topic]?
- On a 1-5 scale: Rate your awareness of how to raise questions, concerns, or suggestions concerning [the specific compliance topic].
- On a 1-5 scale: Rate how well the program materials or trainings have been localized or customized for your function or location. (1 no customization - 5 thorough customization)

Champion Trains the Workforce

The Champions are trained and ready to go. You've provided them with training materials, a communication kit, and a timeline. It's important for you to maintain communication with your Champions and their respective Senior Leaders. Remember, the ultimate goal is to embed compliance in how the business function or location operates. Ongoing involvement of the Senior Leader is critical.

Tip: Check in with the Champion and Senior Leader a day or two before they launch their training. Have a prep call with the Champion to review the materials and answer any questions.

At this point, your role is to support the Champion and collect feedback. Think of the Plan-Do-Check-Act cycle. The Champion is in the Do stage, but you're moving ahead to the Check stage.



CHECK

Your role in the Check stage is to monitor and evaluate the effectiveness of the Champion Program and the individual Champion's performance.

Introduction: Check

The Champions have launched the training program in their function or location. Time to check to see how it went. A key part of your role in the Check stage is to facilitate and maintain open communication between:

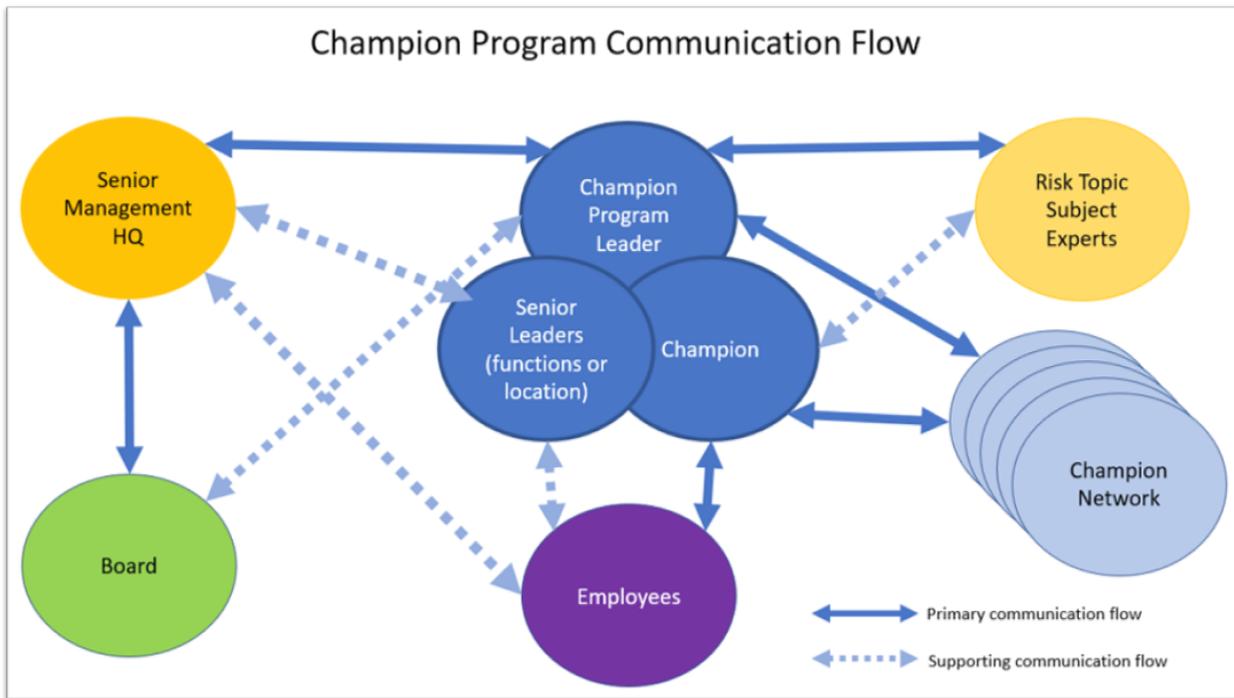
- The Champion, their Senior Leader, and you
- The Champion network and you

It is important in the beginning that the Champions feel supported by you and connected to the other Champions. We suggest a two-step approach to gathering initial feedback:

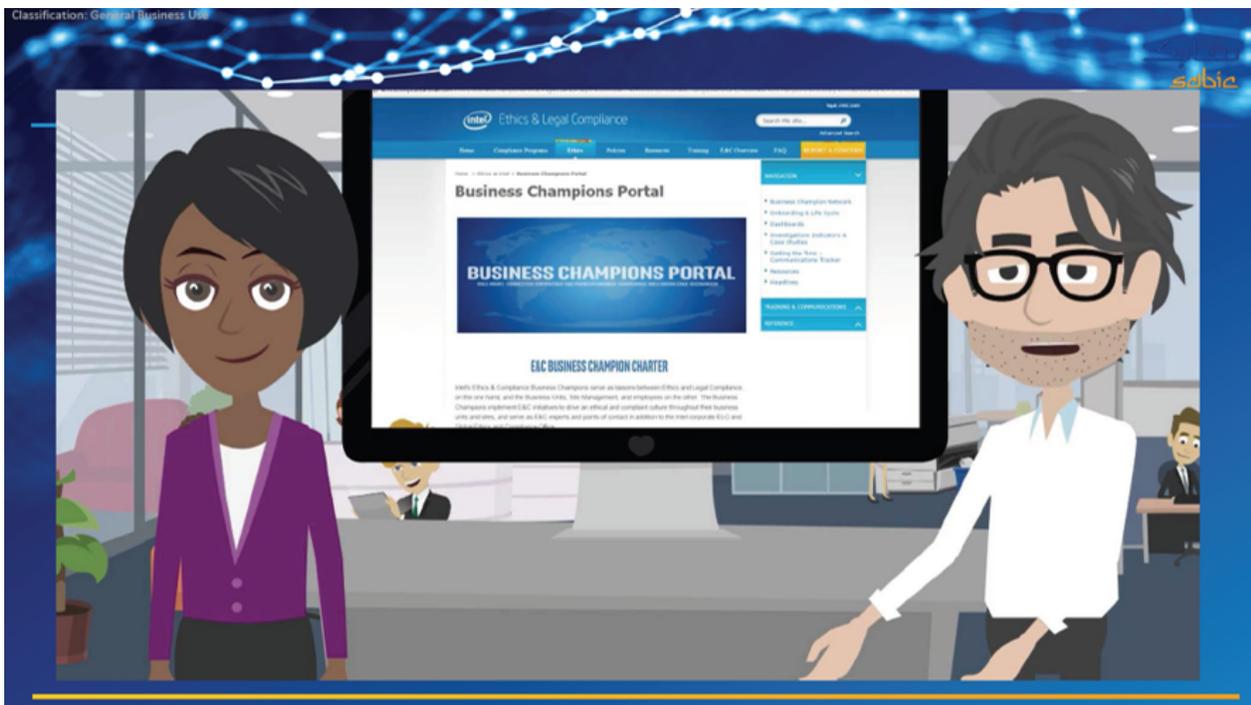
- Individual calls with each Champion so you can have an open conversation
 - A Champion group call, so the Champions can learn from each other
-

Building communication between the Champions is a critical element of the program. Your program will mature more quickly if you facilitate knowledge sharing between the Champions. One way to do this is to create a shared file site or intranet channel where Champions can communicate with each other. The group calls mentioned above are also a valuable method.

Here is the diagram we introduced in the Plan stage showing the ideal communication flow for a Champion Program.



Here's an example of how BELA member company Intel facilitates communication between Champions.



Monitoring the Milestones

After the initial training is complete, it's time to roll out the ongoing communication program. Your role is to provide project management support for the Champions to help them stick to their timeline and monitor their progress. You also need to make sure to keep each Champion's Senior Leader informed and involved. You will get the best results if the three of you become an efficient team. As we mentioned, you are like the three legs of a stool.

Collecting the Metrics

Part of your ongoing responsibility as the Champion Program Leader is to oversee collecting the metrics. How you do this will vary based on your company. Don't forget about this critical aspect of your program. The metrics are a key part of your reporting and are needed as the basis for continual improvement as you go to the Act stage. Remember, you can't improve what you don't measure.

Reporting

There are a few aspects to the reporting:

- Reporting from the Champions to you (the Program Leader) on their sphere
- Reporting from you back to the Champions and Senior Leaders on the overall Champion Program
- Reporting from you to Senior Management on the overall Champion Program

It will make your reporting a lot more efficient if all of your Champions use a consistent reporting format. We've provided an example of a reporting template that you can use and modify as needed. You may want to send the sheet out or have it hosted on a central file-sharing site so each Champion can enter their own information. The Champions need to be sensitive about what their role is and knowing what to report. Providing a reporting template will help to focus them on the proper metrics and topics.

It is also really important for you to hear from the Champions about their experience. One great way to do this is to have each Champion complete a short self-assessment. The purpose is to get their opinion of how the Program is going and how they think they are doing.

Here's a [resource with some sample questions](#) you can use.

As part of monitoring the Champion's performance, it is important to keep a simple record of their participation, their success in meeting the timeline, and the impact on the compliance program in their sphere. These records are useful when you discuss their performance.

Addressing Challenges

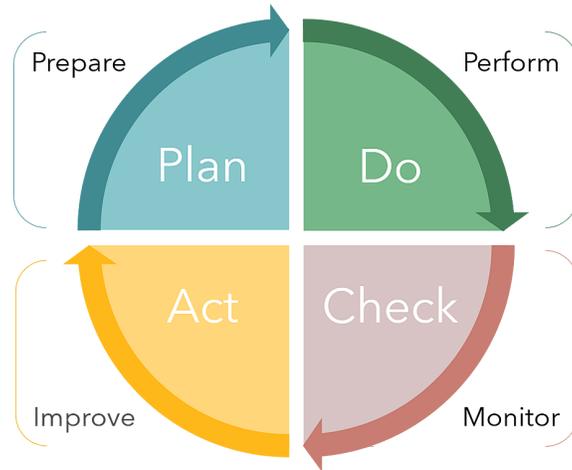
An effective Champion Program demands ongoing attention and frequent communication. However, it does not require a lot of time once it is running. Along the way you, and each Champion, are likely to encounter some challenges. Here are some typical challenges:

- Employees are not paying attention to the Champion
- Senior Leader is not providing enough support to the Champion or you
- Champion is not getting enough support from you
- Champion feels they are isolated from other Champions

The core solution to all of these challenges is better communication. Take another look at the communication channels diagram to see how you're doing.

Tips for Better Communication – especially with a remote workforce:

- Have a monthly "All Champion Check-in" call
- Send a monthly email to the Senior Leaders with updates
- Check in with the employees directly to get their feedback
- Send a quarterly message from your Senior Management to reinforce the importance of compliance and the purpose of the Champion Program



ACT

Act is the final stage in the continual improvement cycle and, in some ways, the beginning of the next cycle.

Introduction: Act

This is where you take action to revise the Champion Program as necessary.

There may be obvious things you need to change or improve. But at the very least, it is time to analyze the results and move ahead in the cycle to the next Plan stage.

In the Act stage, it is important to review all of the elements of your initial Champion Program plan and make adjustments based on results and metrics. Consider the following areas as needed:

- Selection criteria
- Champion Program Leader role
- Champion role
- Champions (personnel)
- Training
- Communications
- Monitoring
- Metrics
- Reporting

Evolving to Meet New Risks

If you started with a pilot program that was focused on key functions or regions, it's time to plan for a broader roll-out. Think about changes in the risk environment. These could be internal risk factors resulting from acquisitions, expansion into new markets, or the introduction of new products/services. Or they may be external risk factors resulting from new regulations or enforcement guidelines. In either case, your Champion Program needs to be flexible to adapt to the changing risk environment – regardless of which specific topic it is focused on.

Replacing Champions

There are three reasons you will need to replace Champions:

- Champion is not performing
- Champion leaves the function or location (or company)
- Two-year term limit ends

One consideration in the Act stage is how to motivate or replace Champions that are not performing. We suggest using the metrics as the basis for the discussion. Using data on their level of participation and success in meeting the timelines will make it easier to justify a change, if needed.

Remember, being a Champion is a volunteer job that may or may not be part of their performance review. They may no longer feel they have the time or interest to be effective in the role. If you need to replace a Champion before their two-year term limit, having the support of the Senior Leader is important.

When a Champion's term ends or they leave their role, it is important to plan for a transition period. You want the Champion's knowledge and experience to be transferred to the new Champion. It is also a good idea to involve the Champion and the Senior Leader in selecting a replacement.

Next Step in the Cycle

Once you have reviewed the Program and determined what action is needed, it's time to re-enter the Plan stage. You will make any needed adjustment to the Plan and move ahead to the Do stage. Embrace the continual improvement cycle and your Champion Program will be sustainable and successful. You will see measurable improvement that shows that compliance is more and more embedded into how each function and location operates.

Celebrate Success

Congratulations on your accomplishments. An important part of building a compliance culture is celebrating success. Take the time to share the Champion Program's accomplishments and thank everyone involved. Pausing to celebrate success creates a ripple effect in your company and rejuvenates the team for the next cycle in the continual improvement journey.