

Lunch Discussion

Ethics is my bag – creating engaging ethics training for a complex organisation

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Thursday 20 September 2018

Introduction

Philippa Foster Back CBE, Director of the IBE, opened the lunch discussion by welcoming guests and introducing the guest speaker. David Morris, Head of Compliance Training and Communication, Royal Mail Group started by explaining his background. Prior to joining Royal Mail Group, David has worked in pharmaceuticals, logistics, clothing retail and food retail. The experience of working in different sectors has helped to drive the compliance function across Royal Mail Group, which saw the team winning two major awards in 2017. He is responsible for the development of the compliance and business ethics training strategy, ensuring his colleagues are equipped with the tools to make the right decisions.

Presentation

Royal Mail Group (“RMG”) are the Universal Service Provider. They have ~143,000 employees in the U.K. which equates to around 1 in 185 people in the U.K. being employed by them.

Every spring RMG conduct an employee survey. The survey is sent to all employees, with the findings being used in business unit action plans. In 2017 the RMG Compliance function used some of the analytics, to support them in the creation of a compliance and ethics training programme, Leading with Integrity. To compliment the employee survey, a Culture and Ethics survey was launched in the autumn of 2017 to all management within RMG, focussing on areas not covered in the employee survey, yet still kept a dotted line, to hopefully back up some of the statements laid out in the employee survey.

The Culture and Ethics survey did exactly as had been hoped. It reaffirmed the culture that colleagues turn to their managers for advice on all topics. In fact 70% of those surveyed went to their managers as the first port of call. That managers are seen to be the role models and colleagues expect them to live to the corporate values every day. That colleagues should be able to trust their managers and that managers should display openness and honesty at all times. On reflection, this provided the RMG Compliance with a huge opportunity. By working with line managers, on how they live the values, how they identify compliance and ethics red flags and how they can create a culture of then speaking up, would ultimately help further develop a compliance and ethics culture across RMG.

The first step was to identify the resource, time, budget and desire to bring Leading with Integrity to life, and to whom training needed to be given to.

All in all, it took 13 weeks from the initial idea to the end product. The initiative outlines the benefits of integrity and tries to cover every ethical angle to sow the seeds for good business practice. All the data collected was used to see where differences can be made across the business, and different stakeholders got involved to help. The values of the business were underpinned to make sure everyone knows what they are and how to implement them. Also, high risks business units (as determined by the compliance risk assessments) and their managers (those with 5 staff under them or more, or deemed to be ‘influencers’) were picked out to attend a full day workshop. This was done to ensure that these critical units understand what a compliance/ethical red flag is. A feeling that something does not look right should be enough so that an effective speak up culture is encouraged and implemented across the organisation.

Leading with Integrity was rolled out in November 2017. It focused on front line engagement through workshops and a purpose-built game. The game involves identifying ethical dilemmas and acting on them against the clock, making them fun and engaging. A behavioural assessment is also built into the storyline. For every person who plays the game, a donation is made to the Royal Mail Group charity of the year, Action for Children. The whole initiative worked out at 9p per employee as the developers agreed to make the game free because of the charity donations. 30 minute talks about ethics with different business units were also set up and ethical champions across the business were nominated to engage people. The Compliance team took over every internal communication channel, such as WhatsApp, the employee app, colleague briefings and the corporate TV channel to spread awareness. Courier, the corporate newspaper, also had interviews and articles on the initiative. During these takeovers, the focus was on talking and writing about ethics, and what constitutes doing the right thing.

The aim of Leading with Integrity is to show the benefits of leading with integrity in every work function within the organisation. The game asks what values mean to the individual worker and encourages a culture of values and

positive change. In this sense, it is necessary to provide staff with the necessary tools to speak up so that they are able to do so. Another initiative was an ethical treasure hunt around Farringdon. To ensure transparency, every manager had to make a pledge and then share their pledge. By the end of February 2018, the compliance team had caught up with managers from different parts of the organisation. This was a necessary step to embed and ingrain Leading with Integrity.

Every single employee that joins the organisation has to read and know the organisation's business standards. There has been a 600% increase in compliance communication since last year, as staff are now turning to the compliance team with basic queries. This is because employees now know who the Compliance function are and how to use them. For the annual survey, 40% of respondents took part in the first 5 days. Impressively, 20% of managers did the survey on the day of the launch. The annual compliance refresher saw 99.8% completion within 23 days of launch in 2018. In 2015 it took 12 months to achieve this.

The work that RMG are conducting around further embedding a compliance and ethics culture has gained recognition from a number of awarding bodies, such as Dow Jones, Learning Technologies and Women in Compliance.

This ethical focus, however, is a continual process as the Compliance team interacts with business unit leadership teams so that they know what is happening and where the legal and regulatory risks lie. Compliance communications always focus on current issues, such as modern slavery, to keep ethical behaviour and problems at the forefront of people's minds.

Overall, the process has been about going back to basics. Focussing on leading with integrity. Knowing what red flags are and how to escalate them and for the Compliance function to become effective business partners and enablers across RMG.

Q&A

The presentation was followed by questions from the audience. Among the issues raised were:

- These ethical efforts are recent and new. How do think you are going to keep up this level of interest in the future?
- In the early stages, were there any groups of managers that were more resistant to the changes than others?
- Line managers actively encourage people to contact their managers, but we often do not get to hear about it. How did you tackle this issue?
- On the annual refresh survey, how do you choose your topics and who gets the survey?
- You have told of buy-in and goodwill from managers, but this process is not seamless. How do you get people to sit down and talk?
- You had a catalyst that was a driver, but what drove the programme to be as successful as it has been?
- You mentioned your employee survey. Can you share some more about your output/findings from that? It is about getting it to the people at the bottom and that is the hardest part.
- Do people perceive the risk more than they are being retaliated against?
- What you have said about speak up is right. People tend to leave if they are not taken seriously or retaliated against. Do you have any tips about how to get people to do more than just tick a box (i.e. token exercise) and address the issues?