

# Ethikos Volume 37, Number 3. July 01, 2023 How to effectively launch an ambassadors program

by Julia K. Bailey, JD, MBA, and Matt Silverman

Julia Bailey (juliabailey@maximus.com, linkedin.com/in/juliakbailey/) is Chief Compliance Counsel, Senior Vice President, Global Ethics and Compliance, at Maximus, McLean, VA, USA.

**Matt Silverman** (<u>matthew.silverman@viavisolutions.com</u>, <u>linkedin.com/in/matt-silverman-5b9394126/</u>) is Global Trade Director and Senior Counsel, at VIAVI Solutions</u>, Chandler, AZ, USA.

This article is based on a presentation given by the authors at Society of Corporate Compliance and Ethics' Leading an Effective Ethics and Compliance Ambassadors Program.

Ambassadors programs (sometimes referred to as "champions" or "liaisons" programs) are seeing an increase among organizations looking to leverage resources from their current employee base—especially at a time when hiring new employees is unfeasible. This trend is especially popular in compliance and ethics. Why develop an ambassadors program? There are numerous reasons, including the following:

- Companies don't have the budget (or the necessity) to hire full-time compliance and ethics professionals at every site, in every region, or within every department.
- To help fill in "gaps" by creating a greater presence and awareness of compliance and ethics policies, procedures, and best practices.
- Helping a centralized compliance or ethics team to remain aware of local concerns, risks, and potential violations.
- Improving compliance and ethics communications throughout the organization, helping to support and grow an ethical and compliant company culture.

Regardless of the reasons you choose to launch an ambassadors program, not everyone in your organization may see its benefits which could provide roadblocks along the way. To put you in the best position for success, it takes preparation and collaboration ahead of time for an effective launch, including (1) developing an organizational structure and implementation plan; (2) getting management support; and (3) setting expectations.

## Developing an organizational structure and implementation plan

One of the best ways to demonstrate to management your goals for an ambassadors network is to present an organizational structure and formal implementation plan. While such plans may change during the planning phase (especially after getting feedback from management), they will help to keep you organized and on target.

## The structure

Developing an organizational structure for a compliance ambassadors program involves several steps. Here are some general guidelines to consider:

### Step 1: Define the goals and objectives of the program. Clearly define what you want to achieve with the program.

Copyright © 2024 by Society of Corporate Compliance and Ethics (SCCE) & Health Care Compliance Association (HCCA). No claim to original US Government works. All rights reserved. Usage is governed under this website's <u>Terms of Use</u>.

Is it to increase compliance awareness? Promote ethical behavior? Prevent regulatory violations? Do you want ambassadors to represent ethics and compliance as a whole or a portion, such as privacy or export controls? The goals and objectives will impact the types of skills you want your ambassadors to have, the training you provide them or how many ambassadors are necessary to carry out those objectives. You should be clear about the limitations of the ambassadors' role, including: (1) act as *part-time* representatives of the compliance and ethics program; (2) be *proactive* partners, helping create greater awareness, provide guidance to colleagues, and update compliance/ethics leaders on issues and concerns coming from the local or department level; and (3) should not be expected to provide all the answers, act as subject-matter experts, nor provide legal advice.

**Step 2: Determine the scope and size of the program.** Consider your objectives for your ambassadors program, the structure of your organization, your geographical locations, the size of your organization, the number of employees you have, and the complexity of your compliance requirements and risks. If your organization is structured by business lines or business units, it might make sense to have ambassadors represent those business lines or divisions, concentrating more ambassadors on business lines that have the most compliance risk. If your organization is in multiple countries, it might be best to have ambassadors represent each country or region to better address the differences in language, laws, and culture. Deciding on the number of ambassadors should consider your total number of employees. There are several benchmark studies that can give you an idea of best practices based on the size of your company and the industry it is in. For example, a 2019 benchmark study by ECI suggests there should be one ambassador for every 200 employees. At the end of the day, scope and size are a judgment call based on these considerations.

**Step 3: Describe the structure and stature of the ambassador role.** Ideally, the term of an ambassador's service should be limited to one or two years, at which point a new ambassador would be chosen to replace them. This allows for more people over time to be part of the ambassadors program, helping to quickly grow a compliant culture. You should also set the maximum amount of time that is expected of an ambassador to fulfill their responsibilities. The recommended limit is no more than 5% of an employee's time. Having a short term of service and a limited amount of expected time per week is also easier for management to accept. Being chosen to be an ambassador should be considered a chance to develop professionally and should only be offered to high performers. Avoid any employee who does not model ethical behavior. Managers should be allowed to choose the ambassadors who are recruited from their teams and encouraged to promote the role as a prestigious position.

**Step 4: Establish reporting and communication lines.** Set up a reporting and communication structure to ensure ambassadors can directly access compliance professionals to ask questions and escalate issues as needed. Also, establish a way to provide regular, two-way communication between ambassadors and the compliance function. Ambassadors should be able to receive and help cascade compliance communications throughout their employee population and provide regular feedback on the success (or failure) of compliance initiatives.

This document is only available to subscribers. Please log in or purchase access.

### Purchase Login