Why Chief Compliance Officers Must Lead the Culture Agenda

Employees represent an organization's greatest asset and one of its most significant risks. Chief Compliance Officers—once policy enforcers but now also trusted advisors and culture builders—must demonstrate that their people are equipped to prevent, detect, and respond effectively to compliance risks.

The Biggest Human Risks

Human risk cuts across compliance and ethics domains:

- **Corruption and Fraud:** Bribery, embezzlement, or financial fraud.
- **Cybersecurity Failures:** Using weak passwords, falling for phishing attacks, or mishandling sensitive information.

How to Manage Human Risk

Managing human risk calls for a new approach to training—embedded, contextual, and continuous—aligned with the daily real-world pressures employees face.

DID YOU KNOW? **29%** of CCOs see organizational culture as a significant compliance barrier.

–PWC

SAi360

RISK FROM EVERY ANGLE

A Framework for the Future

To mitigate human compliance risk, organizations must consider training beyond ad hoc approaches. A practical approach integrates training into a broader ecosystem, aligning it with policy, reinforcing it through declaration processes, and monitoring it with analytics. Below is a five-part framework:

Tone from the Top Policies & Code of Conduct

When employees see that acting with integrity is rewarded (and misconduct is penalized), it reinforces a culture where doing the right thing becomes second nature.
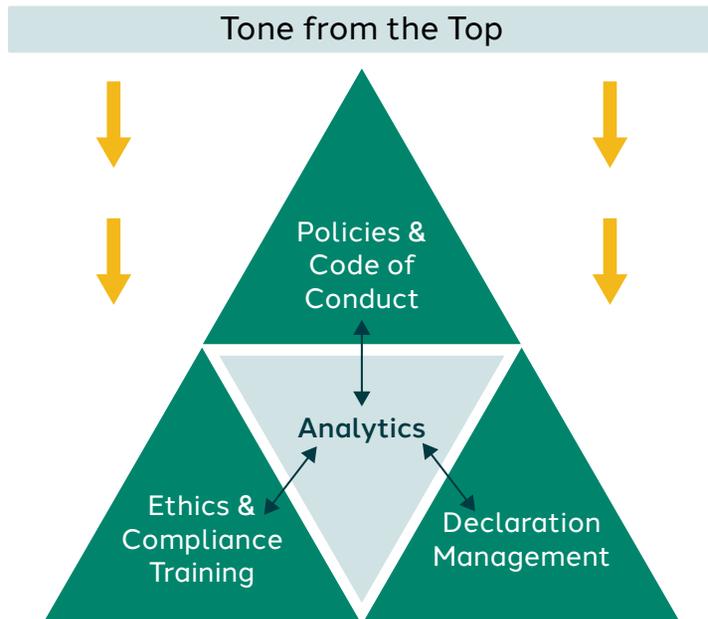
Policies & Code of Conduct

Policies, codes, and guidelines should be readily accessible as the foundation for effective training and ongoing compliance.

Targeted Training That Evolves with Risk

Training must be context-specific and aligned with the most critical risks and compliance obligations.

Training must be continuous, so instead of one-size-fits-all yearly training, it should be replaced with more targeted, role-specific learning delivered throughout the year.

Integrated Declaration Management

Compliance requires collecting and managing employee declarations, annual certifications of the Code of Conduct, disclosures of conflicts of interest, gifts and entertainment logs, insider trading pre-clearances, attestations of policy understanding, and more. An integrated compliance framework brings these declaration processes into one unified system.

Real-Time Monitoring and Analytics

The framework relies on real-time analytics to measure and manage compliance. Dashboards must compile data from various sources (training records, policy attestations, incident management systems, audits, HR data, etc.) and use visualizations to highlight trends and hotspots. For instance, a spike in helpline reports in a particular country or a downward trend in training scores in a department should be immediately visible. CCOs can identify whether training is effective and where to adjust content by correlating training data with incident data.

Tone from the Top

Policies & Code of Conduct

Analytics

Ethics & Compliance Training

Declaration Management

Three Tips to Embed Training into the Broader Compliance Ecosystem

Tip 1: Plan for Scalability Without Losing Relevance

Your compliance training and declaration processes must strike the right balance between consistency and local adaptability.

What to do:

- Use role-based logic and region-specific content to tailor training delivery
- Build workflows that trigger different experiences based on employee attributes (e.g., new hire, risk exposure, location)
- Centralize oversight of policy and training content, but empower local teams to adapt delivery where needed
- Ensure your technology platform can support multilingual content and flexible deployment models

Tip 2: Move from Coordination to Integration

To reduce friction and increase impact, training must be embedded into everyday tools and workflows, meeting employees where they already are.

What to do:

- Embed training nudges and reminders into HR systems, collaboration tools (like Microsoft Teams or Slack), and onboarding platforms
- Use microlearning modules that pop up at moments of relevance (e.g., before approving a gift or travel expense)
- Automate prompts based on behavior or risk signals, such as triggering refresher training after a policy violation
- Break down compliance into digestible interactions rather than annual one-and-done sessions

Tip 3: Integrate Training into Your GRC Platform

Integrating training data your GRC or compliance monitoring platform provides the visibility needed to act early and decisively.

What to do:

- Feed training completion, attestation, and disclosure data into your GRC platform in real time
- Correlate training gaps with other signals, like hotline trends, audit findings, or policy breaches, to spot emerging risks
- Use dashboards to identify departments, regions, or teams where training performance or completion may be deteriorating
- Create closed-loop feedback by adjusting training programs based on incidents or behavior patterns

DID YOU KNOW?

74%

of breaches involve a human element.

-Verizon

How Can SAI360 Help Chief Compliance Officers Mitigate Human Risk?

Managing human risk is about building a culture where doing the right thing becomes instinctive, supported by the right tools, processes, and leadership commitment.

SAI360 provides a comprehensive solution to bring this vision to life. From customizable, role-specific training modules and multilingual delivery to centralized policy management, automated declarations, and real-time analytics, SAI360 enables compliance teams to scale their programs without losing relevance or oversight. With seamless integration into existing systems, the platform empowers organizations to embed compliance into the flow of work, proactively managing human risk while fostering a culture of integrity and accountability.

Our unified approach to risk sets us apart

Today's complex risk landscape demands more. SAI360 leads the way with an integrated GRC platform that spans the entire risk and compliance spectrum.

- Whistleblower and Case Management
- Ethics & Compliance Training
- Policy Management
- Conflicts of Interest
- Incident Management
- Regulatory Compliance
- Regulatory Obligations
- Horizon Scanning
- Enterprise & Operational Risk Management
- Third-Party Risk
- Internal Audit
- Internal Controls
- IT Risk
- Business Continuity
- Vendor Risk Management

Interested in learning more about how SAI360 is helping companies build ethical workplace cultures?

Request a demo.

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RISK FROM EVERY ANGLE