

Chapter 10 – Client and community awareness program

The topics covered in this chapter are:

- Why client and community awareness matters
- Relevant legislation
- How to create client and community awareness
- Developing a communication plan
- Providing clear guidelines to external service providers
- Monitoring the outcomes
- Best-practice target

Why client and community awareness matters

The community in general and clients in particular are key stakeholders and government is responsible to them. The Australian Standard for Fraud and Corruption Control states that an entity's commitment to its Fraud and Corruption Control Plan (Plan) should be communicated to all external stakeholders. (AS 8001:2008, p. 20)

To maintain public trust, the community must be confident that organisations and their officers behave ethically.

Some major benefits that come from good communication of the organisation's values and practices include:

- forestalling potentially unacceptable practices
- increasing the likelihood of detecting suspected fraud and corruption
- increasing service standards and satisfaction among all stakeholders
- improving the organisation's standing within the community.

Emphasising that the organisation is committed to probity and will not tolerate fraud and corruption raises morale and productivity inside the organisation and improves the commitment of staff to achieve higher standards of performance overall.

Client and community awareness means a wide-ranging knowledge and understanding of the organisation's standards of corporate and employee behaviour, including everything from policies to codes of conduct.

Your clients should be aware that it is not appropriate to give gifts, rewards or other "incentives" to staff, and that unethical dealings of any kind will not be tolerated. Clients and the community need to know that the organisation welcomes reporting of any corrupt conduct.

Such awareness of the organisation's stance on fraud and corruption does not happen automatically — effective communication programs are needed.

Better informed people are better positioned to recognise and report untoward situations. By fostering transparency and drawing attention to acceptable policies and practices, an organisation is more likely to hear about inappropriate practices from clients and other members of the community.

It is significant that the KPMG Australia and New Zealand *Fraud and Misconduct Survey* of 2010 found that in 25 per cent of cases the largest single fraud in each organisation was reported by an external

party (KPMG 2011, p. 12); however, by 2013 notifications by external parties had dropped to 10 per cent (KPMG Forensic – *Survey of fraud, bribery and corruption*, 2013, p. 28). Clearly, your organisation's best form of defence is through a combination of strong and functional internal controls, and high levels of fraud awareness in your workforce.

While awareness programs work to inform stakeholders, they also send effective messages to potential wrongdoers. Knowing about the organisation's control measures and penalties for fraud or corruption may deter corrupt behaviour or discourage people who are considering bribery or other forms of undue influence when dealing with a public official.

Good communication is significant in developing and maintaining core values, and in any behavioural change process. The process normally involves several steps:

- The organisation creates awareness of the desired behaviour through suitable communications (including education and marketing).
- The organisation fosters attitudinal change through communication that demonstrates personal, organisational or community benefits to the target audience.
- The target audiences begin to deliver behaviour change.
- The organisation maintains communication, assesses the environment in which the messages are being sent, works to maintain the behavioural change, and adjusts the messages and/or the method of delivery as necessary.

Relevant legislation

The Right to Information Act 2009 (RTI Act) aims to make information in the government's possession available to the community, while still providing appropriate protection for individual privacy. The RTI Act states that departmental policies and procedures should generally be available to the public on the basis that government information is a public resource and openness in government enhances accountability.

This mechanism provides for organisational transparency. It allows people external to the organisation the opportunity to compare their experience of the organisation against its policies. Where there is a departure between the service and the policy this provides an opportunity to ensure accountability for the level of service provided by the organisation.

In this way the organisation can be informed about employee actions which may represent fraud or corrupt conduct.

How to create client and community awareness

Developing strategies to create good awareness requires an understanding of the various stakeholders' communication needs, perceptions and constraints. It involves effective promotion of the organisation's views and attitudes while providing avenues for dialogue and feedback. It involves good communication, which will help to ensure that any fraud and corruption prevention measures are focused on clients' needs and expectations and on achieving outcomes.

Communication techniques for creating awareness may range from general communication practices used across the public sector to targeted campaigns to meet specific needs, such as particular client groups or higher-risk functions. Organisations with corporate communication units can develop independent communication plans and awareness strategies using their internal resources. Organisations can make the most of their facilities by working together, sharing ideas and materials, or using available CCC materials and other resources. A collaborative approach is particularly useful for smaller organisations or those that are geographically dispersed because it maximises use of resources and, depending on the messages, can provide synergies for other activities.

A carefully developed communication plan will help to focus on what the organisation wants to achieve and the right strategies and tools for the purpose.

It will ensure that:

- correct messages are conveyed to the right audiences
- materials are client-focused (or target-oriented)
- materials are properly disseminated and easily accessible
- messages are delivered that convey a consistent approach
- messages are delivered in a timely fashion, and in a variety of formats to suit the different target audiences.

Organisation communication objectives need to consider both the internal and the external environment when dealing with fraud and corruption. For example, the risks of fraud and corruption will be lowered by a change in the external environment where potential clients, suppliers and contractors, observe honest and ethical business practices and there is sufficient awareness of standards and practices for people to recognise and report unacceptable behaviour.

Strategic communication can achieve these goals through a combination of public awareness, attitudinal change and behavioural change.

Developing a communication plan

A well-targeted communication and awareness plan usually contains the following.

Statement of objectives

- What outcome you wish to achieve through your awareness strategies, e.g. change attitudes or behaviours; enhance the organisation's standing.

The target audience

- Who should be receiving/reading/using this information.
- Who is likely to have an interest in the topic.
- Who are the different groups you want to communicate with.

Key messages

- What significant things you want all of your target groups to know.
- What you want to say to each particular group.

Communication methods

- What you plan to do to make sure you get your messages across.
- The particular needs, perceptions and constraints of each target audience group.
- The strategies you are proposing for the target audience.
- Other events or activities to help communicate with the target audiences.
- How often to communicate.

Required resources/budget

- What budget has been allocated to cover the costs of the communication program.
- How realistic the budget is for what you hope to achieve.

Key issues

- Constraints or other issues that affect the plan (e.g. sensitivities, budget, opportunities).

Evaluation methodologies

- How you will evaluate the effectiveness of your awareness activities.

Determine your target audience

Target groups will include stakeholders (client groups, contractors, suppliers, consultants, community) who deal with the organisation and who are likely to have an impact on the organisation's operations. They also include those who may be affected or disadvantaged by fraud and corruption within the organisation because of their client relationship.

The outcomes of the risk identification and assessment process provide good starting points (see Chapter 2). They will give a picture of the potential risks as well as likely audience groups and their links with various activities or functions.

Once these risks and groups are defined, the delivery mechanisms and desired messages about the organisation's stance on fraud and corruption should be matched with the audience. In many cases there will be overlaps, and practical resource considerations will always govern the scope of these activities. The important thing to remember is to always communicate with the audience at the grassroots level and in a way that it most readily understands and accepts.

Refine your key messages

Fraud and corruption control awareness should be built around a variety of messages, presented in ways that ensure freshness and consistency.

The messages should stand alone as well as being embedded in all organisation communications and interactions with the external community.

Some of the basic functions of these messages should be:

- setting boundaries and expectations that fraud, corruption and any other forms of dishonest, unethical or criminal behaviour will not be tolerated
- promotion of positive values and the benefits of ethical business practices
- showing that the organisation is committed to best practice and honest and equitable services
- outlining steps the organisation has taken to prevent and detect fraud and corruption, regardless of where the threats may arise
- demonstrating the organisation's resolve to take forthright and impartial action against any party that breaches acceptable best practice in their dealings with the organisation
- outlining the opportunities for reporting unacceptable practices.

Communication methods

The communication strategies should be tailored according to the organisation's specific risks, its stakeholders and the target audience. The CCC website gives examples of promotional and training materials and links to other useful sites. The CCC also provides expert advisory services on policy, communication and change management through its experienced prevention officers.

Some communication options to consider include:

- making codes of conduct easily available for the public
- promoting ethical practices and values statements, such as making them prominent on website home pages

- incorporating suitable messages in external presentations, such as leadership and service group speeches, in the organisation’s promotional materials and in annual reports
- sponsoring appropriate community activities that promote good governance
- incorporating ethical standards and requirements in job advertisements and procurement documentation clearly indicating expected organisation responses and procedures for clients (e.g. procedures for receiving cash payments, timelines for decisions and performance pledges)
- prompting clients to question any procedures until they are satisfied that there has been no inappropriate behaviour by the organisation or its officers
- including explanatory best-practice statements in documentation to contractors and suppliers
- incorporating recoupment (sometimes called “claw back” provisions) and other ethical practice provisions in contracts
- providing responsive advisory and client relation services including a public complaints hotline
- providing fraud prevention stories in client communications and for the media
- incorporating suitable fraud and corruption control materials on the organisation’s website
- taking suitable action when encountering wrongdoing, and being honest and transparent in acknowledging the issues and the corrective measures that are being taken.

It is important to remember that communication is an ongoing and two-way process. The organisation and its employees constantly interact with stakeholders and send messages in subtle ways that influence attitudes and beliefs. The process never stops because it is continually being improved. However, from a practical viewpoint, communication programs normally consist of specific activities or discrete projects or events.

Messages are reinforced by repetition. Their frequency and method of delivery will depend on:

- the type of communication
- the relevance of the message to the person receiving it
- the financial or other impact of the desired behaviour change.

The key to having the receiver retain messages is to send them in a variety of creative and cost-efficient ways, while maintaining a consistent philosophical approach.

Some common dangers in developing awareness

Pitfalls to avoid include:

- defining the communication and awareness process too narrowly
- not thinking strategically in defining the messages, targets and delivery mechanisms
- treating awareness and communication as an afterthought or optional add-on
- not committing sufficient resources to the task
- using communications inappropriately.

Providing clear guidelines to external service providers

Consider the following measures to ensure that external service providers meet expected standards of accountability:

- develop appropriate contractual conditions and access provisions to ensure that performance, accounting and security requirements are met
- provide the organisation’s fraud control policy to external service providers

- establish monitoring and reporting arrangements, providing a flow of information between the parties, so that organisations are well placed to assess their performance under contractual arrangements.

Regardless of how effective the external awareness program may be, its impact will be diminished if the organisation or its employees behave unethically, or if the community thinks that the organisation does not deal with corruption properly.

Conversely, when stakeholders have first-hand experience and see direct evidence of ethical behaviour on the part of the organisation and its employees, the reputation of the organisation is enhanced. Good performance strengthens public confidence in the organisation, its employees and its activities.

The organisation's real behaviour, good or bad, and not the rhetoric of the communications program, will be the ultimate determinant of the organisation's reputation and ability to serve the public interest.

Monitoring the outcomes

External communication effectiveness can be monitored by asking for feedback from target groups. This should be designed to explore their understanding of the organisation's stance on fraud and corruption and what control and prevention measures exist.

Awareness is an exceptionally fluid concept, and the communication plans or awareness-raising programs should be subject to regular review to ensure they retain their relevance. These reviews should seek input from all stakeholders to identify areas for improvement. These improvements may extend beyond the organisation's communication activities, and include better ways of recognising and addressing potential fraud and corruption issues as they arise.

Best-practice target

- (1) The organisation should have an ongoing external awareness program that broadcasts to all its stakeholders its commitment to honest and ethical business practices and the measures it has adopted to prevent, detect and respond to both internal and external fraud and corruption.
- (2) The program should target all stakeholder groups, including suppliers, clients and the general community.
- (3) The messages conveyed by the program should make it clear that:
 - the organisation is committed to best practice
 - fraud and corruption are not acceptable to the community or the organisation
 - wrongdoers will be subject to appropriate disciplinary action and prosecution.
- (4) The content should include the enhancement of ethical practices generally, as well as focused communications to address the specific needs of client or industry groups, or particular organisational functions.
- (5) The program should use a variety of delivery mechanisms, to ensure freshness of the underlying messages.
- (6) The program should include mechanisms for dialogue with and feedback from its target audience.
- (7) The program should be constantly monitored and regularly evaluated to ensure its continuing relevance and effectiveness.

Checklist: Client and community awareness program

The following questions are indicative only. Each organisation should develop its own checklist to reflect its specific needs and risk environment. The checklist should be re-examined and updated periodically, as part of the organisation's program of fraud and corruption control appraisal.

Legislative requirements

Has the organisation arranged for the general public to have easy access (RTI Act section 3) (for example, via the organisation's public website) to the following key documents:

- fraud and corruption control policy/plan?
- code of conduct?
- purchasing policies and procedures?
- gifts and benefits policy?
- register of all gifts or benefits with a retail value of more than \$150 received or given by officers of any public service department or agency (PSC Directive No. 22/09)
- financial statements?
- annual reports?
- complaints policies?
- PID procedures? (PID Act section 28 (2))

Recommended Best Practice

- Has the organisation implemented an external awareness program covering the control and prevention of internal and externally initiated fraud and corruption?
- Does the program cater for all identified target groups?
- Is this awareness program comprehensive and pervasive?
- Does the organisation use a variety of appropriate presentation and delivery mechanisms for the program?

Has the organisation enhanced its public information and community relations role by publishing information about:

- actions taken in response to identified fraud and corruption situations?
- economies and/or improvements to performance or levels of service as a result of improved fraud and corruption control practices?
- Has the organisation enhanced its fraud and corruption management by engaging (either as an organisation or through the commitment of individuals) in more general public information activities and promotional ventures oriented towards minimising fraud and corruption risk?
- Does the annual report include a clear statement of the organisation's stance on fraud and corruption as well as its fraud and corruption control program and any initiatives taken during the year in question?
- Do appropriate public spaces of the organisation, including websites, carry notices about organisational values, probity or performance pledges consistent with a transparent and accountable organisation?

- Does the organisation highlight ethical considerations in job advertisements, position statements and procurement documentation?
- Has the organisation developed a supplier and contractor document covering best practice in business dealings with the organisation?
- Is a copy of the organisation's code of conduct provided as part of tendering documentation?
- Does the organisation's tender and contract documentation carry appropriate warnings against fraud or corruption such as the suspension or recall of contracts for improper business practices?
- Does the organisation explicitly state in its communications that it welcomes complaints or constructive feedback?

Does the organisation monitor its awareness program through surveys and other means to determine whether awareness and attitude change activities have been effective in:

- enhancing the organisation's image generally, and with stakeholder groups in particular?
- enhancing the self-esteem and job satisfaction of employees?
- deterring and/or detecting externally initiated fraud and corrupt approaches from suppliers, contractors or other external groups?