

Compliance culture: concerns and usage scoresheet



AML/CTF program / element (e.g. new customer identification process) _____ **Date** ____/____/____

Stage of concern	Board & senior managers	Systems & middle managers	Operational managers & staff
6. Refocusing: Members are concerned to apply their operational experience to innovate and improve the AML/CTF program/element.			
5. Collaboration: Members are concerned to share their learned expertise and experience with other members.			
4. Impact/consequences: Members are concerned about how the change will affect others.			
3. Management: Members are concerned about how they will fit the AML/CTF program/element into their existing responsibilities. Concerned about details of forms, physical arrangements and timing.			
2. Personal: Members are concerned about the personal impact of the AML/CTF program/element. Concerned about changes in status, workload, capability, etc.			
1. Information: Members are concerned to know more about the AML/CTF program/element.			
0. Awareness: Members are not aware of the AML/CTF program/element; therefore have no concerns.			

Level of use	Board & senior managers	Systems & middle managers	Operational managers & staff
6. Renewal: Members are planning and exploring major modifications to the AML/CTF program/element.			
5. Integration: Members are coordinating tasks associated with using the AML/CTF program/element across sections and between levels.			
4B. Refinement: Members are refining their ability to use the AML/CTF program/element.			
4A. Routine: Members are routinely using the AML/CTF program/element.			
3. Mechanical use: Members have commenced using the AML/CTF program/element, but are focused on understanding tasks associated with using the element and completing them.			
2. Preparation: Members have made a commitment or have set a date to start using the AML/CTF program/element.			
1. Orientation: Members are currently looking for information about the AML/CTF program/element.			
0. Non-use: Members are not looking for information about the AML/CTF program/element.			

Directions

The scoresheet enables a quick evaluation of the organisation's attitudes and behaviours associated with implementing a change in the organisation, such as an AML/CTF program or an element of the program. Attitudes are reflected by the '*stages of concern*' expressed towards the change and behaviours are reflected by the '*level of use*' of programs, processes and procedures.

The scoresheet uses a four-step process to help you understand where, on a path to implement a compliance culture, an individual or a group of people is located at a particular time.

Step 1 – What aspect of a change process do you want to consider?

Identify the component of the AML/CTF program that you are considering, e.g. a customer identification process or the overall implementation of the program.

Step 2 – What are the current issues relating to a change process?

The evidence for determining the '*stage of concern*' comes from the statements that your stakeholders make and from the questions they ask. This evidence can be collected through informal or formal discussions with the stakeholders, listening to what they say and the questions they ask and trying to relate these to the 'Stages of concern' table.

For example, early in the implementation process stakeholders will typically be concerned about the impact of the change on themselves and that new processes will make them relatively less capable than the present. Taking steps to train them on the new processes will help stakeholders to achieve equal or higher levels of capability after the implementation.

Step 3 – What are the current actions relating to a change process?

The evidence for determining the '*level of use*' comes from the current actions of the stakeholder. This evidence can be collected by reports and observations of the actions that stakeholders are taking to support the implementation and trying to relate these to the 'Levels of use' table.

For example, early in the implementation process the stakeholders may be attending meetings to learn more about the change and following this they will set dates and take steps to implement the change.

Step 4 - Analysis

This scoresheet uses a model for change which assumes that stakeholders can best manage change by first addressing lower level concerns and taking actions that will address those concerns, before addressing the concerns that will be encountered later in an implementation.

For example, members that have not first taken actions of orientation and preparation to address information and personal concerns will not be well equipped to address concerns at the management stage, or for acquiring skills at the level of mechanical use. The remedy for members who are not addressing lower levels of concern and stages of use may be for the program implementation manager to schedule activities in the project plan to enable these lower levels of concern and stages of use to be addressed.

Another use for the tool is to compare where on the implementation path stakeholders from different work groups may be relative to other work groups. For example, groups that are not advancing through an implementation process at the same rate as others may need to be managed differently. Alternatively, groups that are progressing through an implementation process more rapidly than others might be identified as being able to contribute experience to others, or it may be that steps in the implementation are not being addressed to the level of detail that is actually required.

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A third use for the tool is to help judge the level of readiness, as reflected by a stage of concern, to undertake activities that will move the stakeholders up the table of the level of use. Generally, activities in an implementation plan to effect a cultural change will progress as concerns are addressed and the stakeholders are ready to take the next action.

Use a tick (✓) to indicate the *'stage of concern'* and the *'level of use'* for each of the organisational levels – board and senior managers, systems and middle managers, and operational managers and staff.

Record the date so you can evaluate progress over time. Use the scoresheet whenever you need to evaluate the organisation's progress in developing its compliance culture.

Background

The scoresheet is based on the change management concept known as the Concerns-Based Adoption Model (CBAM). A change of attitudes and behaviours occurs when individuals' concerns are addressed. The *'stages of concern'* form a number of steps that each person will usually pass through, one at a time. The *'levels of use'* form a number of steps of increasing ability and confidence that match the level of concern.

An implementation plan will consider how to support moving people through the levels of use by providing information, directions and feedback that match the current level of concern.

Although this scoresheet considers people collectively in three organisational levels, keep in mind that individual members will progress through the stages of concern and the levels of use at their own rates. Some individual members may progress much faster or much slower than the average for the level and this variation will also provide a challenge for you as the AML/CTF program implementer.

An implementer may also encounter difficulties if individuals move to a higher stage of concern or level of use too quickly and the underlying levels are not fully satisfied or achieved. For example, if routine use is not achieved within a unit before it tries to share its experience with others, the quality of what it has to share may be less than its full potential. Or if personal concerns are not addressed early, a member may carry a lack of conviction about the AML/CTF program or element that will undermine attempts to resolve higher stages of concern.

Reference

The Concerns-Based Adoption Model (CBAM) was first proposed in *Taking Charge of Change* by Shirley M. Hord, William L. Rutherford, Leslie Huling-Austin and Gene E. Hall, in 1987, published in the United States by the Association for Supervision and Curriculum Development. CBAM has been in use for more than 20 years, initially for teaching and schools management and then extending into business practice.

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