The Swiss Cheese Model

• Analysing and Managing Risk - Simon Truckle
The Scenario

- Let’s imagine we have a new starter, I’ll call her Joanna. She has been with the company about a month and works in the procurement department.
- Today, she is meeting several suppliers to discuss a new project
- One of the suppliers is familiar - Joanna’s brother-in-law runs it!
- Another supplier hands out goody bags containing a pen, a stress ball, and an iPad worth £400.
- The pitch by the supplier run by her brother-in-law is the best. She votes in their favour, and they win the contract.
- Any issues?
- An audit later on in the year finds Joanna to be in breach of anti-bribery procedures. She and her manager are reprimanded.
How could things have gone better?

James Reason

- A Cognitive psychologist from the University of Manchester
- Developed the Swiss Cheese model for analysing risk
- His model has been used to analyse safety in the aviation industry, hospitals, and most recently to fight Covid-19.
The Swiss Cheese Model

- Unread policy
- Policy Attestation
- Box-tick learning
- Online Training
- Unreported gift
- Compliance Registers
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- Policy Attestation
- Online Training
- Compliance Registers
- Offline Training
- Compliance Declarations
- Analytic Assessment
- Intelligent Learning
- Integration

Unread policy
You may have all the right policies, but you need to be sure your employees read them, understand them and commit to complying with them to make them effective.
Relevant Learning.
Provide targeted training to your employees, especially new hires and those in high-risk functions.
Declarations or disclosures

Financial firms use them frequently to ask employees for their conflicts of interest, but companies of all types can use them to prevent breaches.
Registers

Registers to approve and record gifts, hospitality, donations, outside business interest and personal account dealing.
Offline activities
As a significant percentage of learning in the corporate workplace happens it is crucial that you capture this activity
Intelligent learning
Online learning that used AI to adapt the content to the specific role and knowledge level of the learner.
Analytical Assessment

Assessments that provide a granular breakdown of scores against competencies and reveal knowledge gaps across your business.
Surveys

You can further strengthen your compliance programme with better information management.
Finally, all of the protective layers can share data via APIs and integrations with each other and any internal systems you currently have in place.
Integrated Compliance Portal

- LMS
  - Courses
  - Games

- Policy Hub
  - Attestations
  - DSE
  - FPQ
  - CMQ

- Compliance Declarations
  - Ethics
  - Diversity

- Compliance Surveys
  - GHR
  - Conflicts/OBI
  - Breaches
  - Donations

- Compliance Registers
  - F2F training
  - Webinars
  - Zoom

- Training 360
  - Branching
  - Adaptive
  - Personalised

- Relevant Learning
  - Granular
  - Reporting

- Analytical Assessments

COMPLIANCE PORTAL