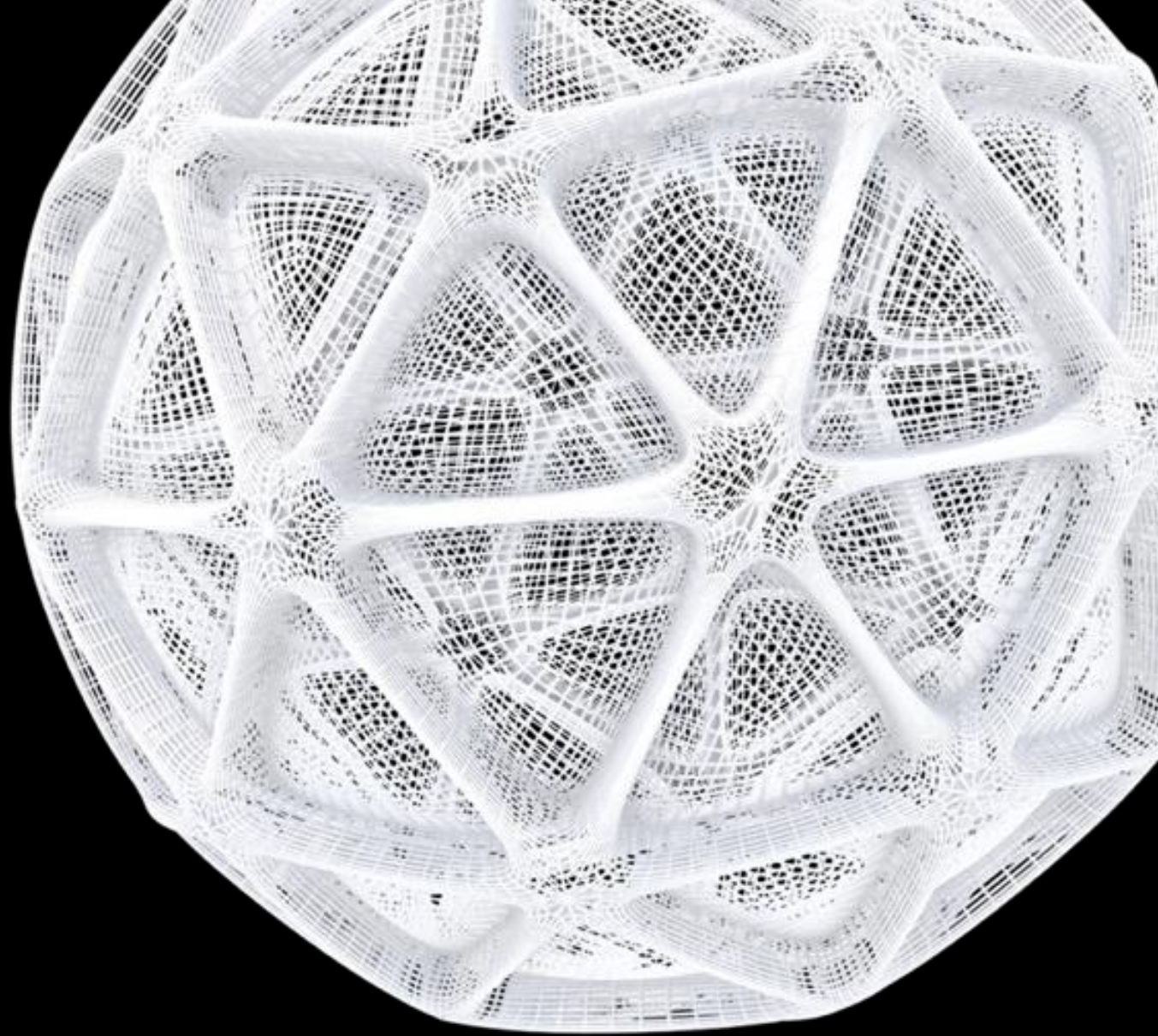




Risk intelligent culture: Accelerating COVID-19 recovery

Enabling culture disruption from COVID-19 to thrive and
drive resilience in the new normal



From crisis response to recovery, and beyond

As the COVID-19 pandemic erupted businesses focused on the initial crisis response. Leaders are now focusing on the strategies to drive recovery and enable their organization to thrive again.

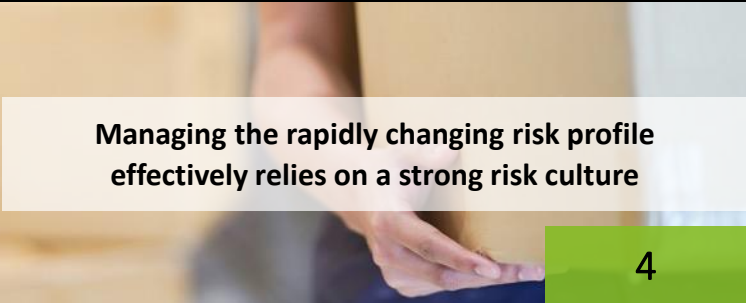
We explore the critical role of risk culture, underpinned by ethical foundations of purpose, values and principles, to accelerate recovery into thriving and new world resilience. A purpose-led, intelligent risk culture drives ongoing vigilance and flexibility to adapt quickly to the changing risk profile, which is more important now than ever before. While traditionally risk culture has been primarily a focus for Financial Services due to regulatory requirements, we show the business benefits for all organizations in strengthening the risk culture beyond regulatory expectation.

During COVID-19, leading companies have reported that throughout this uncertainty they have never been clearer on their purpose – the ‘North Star’ guiding prioritization of actions, underpinned by organizations’ values and principles shaping how to pursue that purpose. We explain how transformation to a risk intelligent culture can protect against further loss or damage to the organization, its people, customers and stakeholders. We provide guidance that will help you strengthen your risk culture by considering purpose, decision-making, the role of leaders, and simultaneous pathways to strengthening mental health and the risk culture.

This article is applicable to readers who are accountable for risk culture, assessing risk culture, setting organizations’ business and risk strategies and objectives; and nurturing their people and talent and conduct to their customers.



Summary



Managing the rapidly changing risk profile effectively relies on a strong risk culture

4

Risk Culture is crucial for guiding appropriate risk behavior and decision-making under conditions of uncertainty and stress. Throughout COVID-19, we’ve dramatically changed the way we work – possibly long-term – and risk profiles have changed rapidly and continue to evolve, and we have learnt a lot about working environment enablers. As the risk landscape changes, a mindset shift is required. Risk culture plays a critical role in the firm’s sustainability and recovery.



COVID-19 highlights the need for a purpose-led risk culture to accelerate recovery, and enable thriving

6

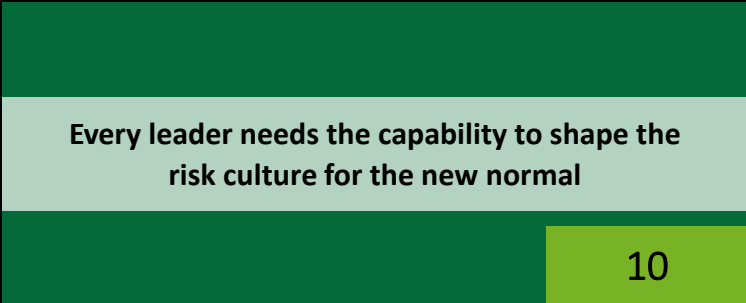
Regulators, employees, shareholders and general public are continuing to expect that firms will build a risk intelligent, purpose-led culture. Clarity of purpose will help enable strong and sustainable recovery from COVID-19. Organizations that have taken purpose seriously have benefited through rapid and flexible COVID-19 responses, in large part due to the way this influences a risk intelligent culture, enabling early identification and response to opportunities and risks.



People are watching how leaders navigate the ethical uncertainty of decisions under pressure

8

Organizations will continue to face a dynamic, high pressure environment through recovery. Navigating this challenging terrain will rely on leaders’ ability to make responsible decisions, which will leave a lasting impact on the risk culture, signaling how decisions should be made and what should be prioritized. A risk intelligent culture will be influenced by leaders making confident, rapid, controlled, and agile decisions, based on a sound understanding of the organization’s purpose, strategy, objectives, and risk appetite.



Every leader needs the capability to shape the risk culture for the new normal

10

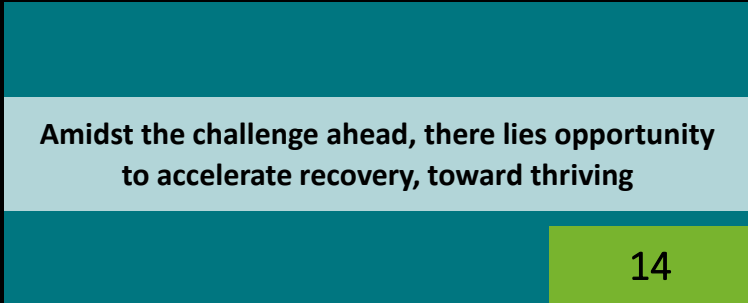
Leaders will shape the mindsets and behaviors of people throughout the organization, shaping the way risk is considered, managed and harnessed in the ‘new normal’. Leaders have an opportunity to accelerate culture transformation by providing strong foundations from which to recover.



For the organization and people to thrive, improve mental health and risk culture simultaneously

12

To recover and thrive beyond COVID-19, organizations need to prioritize employees’ mental health and wellbeing. When people experience positive states of mental health, they are more likely to be adaptable and innovative, navigate uncertainty and consider risk appropriately. While mental health culture and risk culture are not necessarily always correlated, organizations will benefit from targeting pathways that contribute to improving both outcomes simultaneously.



Amidst the challenge ahead, there lies opportunity to accelerate recovery, toward thriving

14

While rapidly changing risk profiles increase pressure and stress, there is great opportunity to create lasting change in the risk culture while the ramifications of risk failure are visible, tangible and relatable... to everyone. The organization’s ability to recover, and eventually thrive, will depend on the extent to which leaders understand the impact this change has had on the culture of the organization, identify and respond effectively to vulnerabilities created and opportunities that have arisen.

Managing the rapidly changing risk profile effectively relies on a strong risk culture



The COVID-19 pandemic is having one of history's most profound impacts on the way people work. Widespread disruption, coupled with financial stress and the blurring of lines between work and home is causing increased anxiety and stress, challenging organizations' ability to manage risk effectively. However, for many organizations, there have been upsides of the changed working habits, too – much of the workforce now have reduced commute times; reduced travel expenses; increased access to leaders through video calls; and for some, a better work-life balance. Technology hasn't inhibited virtual working, but the culture change required to accept mass remote working has been more of a challenge.

For many organizations, the second line has been redirected to focus on the crisis, and the regular schedule of managing risk and control oversight has been disrupted. While the clarity of accountability can become blurred, the first line of defence is relied upon to make effective ethical and risk decisions in their day-to-day work, and a strong risk culture is needed more now than ever.

As people adapt to different ways of working, interacting and trying to balance competing professional and personal demands, new behaviors and attitudes are established - shifting the corporate culture. For some organizations, this new culture will bear little resemblance to what went before. This disruption presents companies with an opportunity to shape this emerging culture that is purpose-led, supports responsible risk decisions and reflects risk appetite.

Risk profiles have changed, and so has the effectiveness of controls

Variations in government and regulatory advice, the needs of customers and business partners, and employees' ways of working are continuously evolving in response to COVID-19. It is now critical for companies to understand the impact of these changes to risks both during the pandemic, and in the longer recovery ahead. In doing so, it is important that risk continues to be viewed holistically.

Many organizations have experienced significant changes in the risk profile. For example, cyber risk exposure has increased with rapid implementation and scaling of technology, and people are facing greater exposure to mental health pressures that may not be visible in the working from home environment. For many organizations, the current control environment may also be operating at reduced effectiveness, particularly where there is a reliance on manual controls. New risks may include:

- Teams may look or be forced to look for work-around solutions to meet their objectives that could unwittingly undermine risk controls.
- Co-working with family/flat mates at home could create privacy and confidentiality risks and also increases cyber security risks.
- Reduced availability of key oversight or peer review contacts.
- The ease of interacting with risk specialists may be impacted by IT limitations or changes to working hours.
- Potential mistakes or misconduct arising from workforce changes, such as rapid scaling up or scaling down.
- Unnoticed conflicts arising due to changes in segregation of duties as people have had to dramatically adjust.
- Internal Audit impeded from undertaking regular oversight of controls (e.g. loss of staff, program re-prioritization, downsizing, remote audits).



Ensuring teams are enabled to do the right thing under stressed conditions



Organizations must increasingly rely on people to do the right thing - not only to make the right decisions but, at times, to manage risks without support or prescribed controls. Many teams are facing widespread destabilization of their typical work environment and support structures while moving at speed to keep businesses performing.

Industries have responded differently to remote working and client expectations. For example, many banks have issued payment holidays to customers and some insurance companies have been slow to pay claims related to lost earnings from COVID-19. The changed way of working, almost overnight, required these workforces to make decisions under increasing cognitive load and greater-than-normal uncertainty.

Stress impacts the ability to make good decisions, and while some level of stress can act to energize and motivate, higher levels adversely affect a range of psychological capabilities including perception, planning and memory. Importantly, stress has specific impacts on a person's capacity to assess risk, often leading to riskier decisions and focus on short-term benefits rather than longer-term outcomes.

Increased distractions and potential reduction in the level of informal peer review and support may impact how different factors are weighed up, and the level of scrutiny applied.

Where are your vulnerabilities and opportunities?

- What impact has your crisis response had on the effectiveness of your three Lines of Defence?
- What do your behavioral insights tell you about the effectiveness of your control environment during COVID-19?
- How has your culture changed in ways that may positively or negatively impact the way risk is understood, identified and managed?

"Intelligence is the ability to adapt to change."

Stephen Hawking
Theoretical Physicist
and Author

COVID-19 highlights the need for a purpose-led risk culture to accelerate recovery, and enable thriving



Increasingly, we are seeing regulators and society expect that firms will build a purpose-led culture. Clarity of purpose will also help enable strong and sustainable recovery from COVID-19.

A strong sense of purpose is critical to managing the COVID-19 crisis. When new risks have presented themselves, and teams are working in uncharted territories for which there are no rules, people rally around a strong sense of purpose to do the right thing. When purpose, values and principles are clearly articulated, they provide a flexible ethical framework for decision making. A ‘north star’ for everyone from which all systems, structures and decisions cascade through the organization. This ethical framework helps shape strategy and risk appetite, bringing to life the right mindsets and behaviors throughout the organization. Clarity of purpose, values and principles guiding decisions become critical as governance and controls become weaker through uncertainty and volatility.

Purpose as a guiding principle

In a time of crisis, where a strong ethical framework is present, non-negotiables and levers for risk management are known and can be flexed for COVID-19 conditions.

Defining the purpose of an organization helps employees understand the societal problem the organization is seeking to solve. Organizations do not exist to create profit; this is merely the by-product of solving the problem. As a result, a purposeful organization must consider the broad church of stakeholders affected by the organization. Rather than a pure focus on investors and profit, a purposeful organization is a multi-stakeholder organization.

An effective purpose will help an organization understand its impacts on a variety of stakeholders, including customers, people, suppliers, community and investors. COVID-19 is bringing sharp attention to the risk of an organization’s actions on external stakeholders, such as how an organization may impact upon the health of customers, or the human rights of suppliers who are more vulnerable than ever. A risk intelligent organization will think beyond the risks to the company, to also consider potential harm to other stakeholders.

A clear sense of purpose empowers employees to feel a greater sense of connection and engagement, enabling them to confidently take action and manage risk even when there is less direction or rules, making them more resilient in crisis.



COVID-19 highlights the need for a purpose-led risk culture to accelerate recovery, and enable thriving



Values and principles to guide decisions

Values and principles, together with purpose, provide a framework for decision making, and will shape the norms and culture of an organization; including how to take on and manage risk.

Working together with purpose helps people ask, 'will this decision help us achieve our purpose?', while consideration of values help people ask 'is this decision a **good** decision?' 'does this decision uphold our values?'. When validated by principles, it helps people test their decision by asking 'is this the **right** decision?'

Regulators in the UK and Australia have placed increasing importance on purposeful, ethical organizations, leading to good outcomes for their customers, employees and investors. Other regulators around the world are adopting a similar approach.

Open feedback channels to promote and enforce a purposeful culture

Employees will feel more connected to the organization's purpose and more certain of its authenticity, if leaders actively listen and visibly engage with the ethical framework, especially in times of crisis¹.

Two-way regular communication becomes more important in crisis - for leaders to communicate any changes and the reasons for doing so; and for employees to be able to share new information. Leaders should communicate the reasons for decisions referencing alignment to the organization's ethical framework and risk appetite, setting the tone for consistently values led decisions.

This will also highlight the importance of appropriate risk tasking, to employees.

When employees (and customers and clients alike) feel that the work they do is meaningful and connected to the organization's purpose, they are more likely to be engaged and resilient, and perform better. Our research shows that purpose-led companies are more likely to outperform those without a clear purpose.

Ensuring your culture is purpose-led

- Do employees feel connected to the organization's purpose?
- Do your people understand how to use purpose, values and principles for decision making?
- Is the ethical framework being effectively used as a tool for decision making, especially when under pressure?
- Is your target risk culture aligned to your ethical framework?
- Does your risk appetite help people think about the risk of decisions harming external stakeholders, such as consumers or community?

¹ Purpose is everything, Deloitte publication <https://www2.deloitte.com/us/en/insights/topics/marketing-and-sales-operations/global-marketing-trends/2020/purpose-driven-companies.html>

People are watching how leaders navigate the ethical uncertainty of decisions under pressure



Organizations will continue to face a dynamic, high pressure environment through recovery. Navigating this challenging terrain will rely on leaders' ability to make responsible decisions under pressure, influencing the new risk culture norms.

Transforming under pressure

There is now significant pressure on leaders to start turning results around, requiring significant decisions about strategy, direction of travel and staffing matters to be made under conditions of uncertainty and ambiguity.

Decision making in uncertainty requires leaders to make rapid, decisive decisions.

Leaders must move fast, while also constantly questioning the source of the facts, their assumptions, their agenda and the changing risk profile.

Diversity breeds creativity

Leaders can be prone to wanting to make decisions rapidly without exploring and debating the breadth of options.

Leaders can be told to get on board with a decision, even when it feels morally wrong or the reasoning behind the decision has not been communicated.

A diverse range of stakeholders can have a dramatic effect on enabling robust debate to produce creative solutions.

Optimism and authenticity

Leaders need to balance empowerment of people and taking charge of direction. People will be seeking reassurance that there is a light at the end of the tunnel.

Create a clear and positive narrative about the future that you are all working toward. Communicate decisions clearly, including the rationale behind the decision.

Balance optimism with authenticity about the uncertainty and risks being taken, and empathy with the concerns people will be experiencing.

Across the world, leaders have had to come together to make decisions for which there is no clear 'right' answer. These decisions have had to be made quickly to reduce harm, and yet they are likely to significantly influence lasting perceptions of how decisions should be made, including the prioritization of risks. Outlined overleaf is some insight into what leaders can expect from themselves and their teams as they navigate these decisions; as well as some guidance for responsible decision making. Such decisions made under pressure will serve to positively influence the risk culture and position the organization for the future.



People are watching how leaders navigate the ethical uncertainty of decisions under pressure



Cast your ethical shadow

People, customers, investors, suppliers and community are watching right now. Leaders must be clear about who they are as a leader, and as a leadership group, and what they stand for and what they don't. Leaders should consider different aspects of the decision: does it align with the corporate purpose and values?

A risk intelligent culture encourages agile and controlled decisions. Leaders should be confident to change their mind if there is a better path in light of new information as it emerges; there is no need to be cornered into the view that there is only 'one right decision'. A psychologically safe environment also allows leaders to feel safe and be transparent in reflecting on a decision that was wrong, and that the right decision is to remediate and change course.

Leaders cast an ethical shadow, which their people will follow. In high pressure situations, they set the tone for what is possible and what is acceptable for today and in the long term. There is not always a 'good' or 'right' answer, but there are steps that will help to achieve the best of the bad outcomes.

"At the end of the day, people won't remember what you said or did, they will remember how you made them feel."

Maya Angelou

American Poet and Civil Rights Activist

How is our decision-making shadow influencing the risk culture?

- Has our decision process changed?
- Does our strategy remain the same? Are we prioritizing the organizational purpose?
- Are our values the same? Are we living by them?
- How have our impacts on our stakeholders changed? Do we need to change our prioritization of stakeholders?
- Do we have the data we need to make an informed decision?
- Is the uncertainty causing us to change behavior?
- What level of control do we have over the decision? Are we making a decision or managing consequences of decisions made by others?

Every leader needs the capability to shape the risk culture for the new normal



Leaders have a unique opportunity to accelerate (risk) culture transformation in an environment of volatility and uncertainty, by providing strong cultural foundations from which to recover and thrive.

Demonstrate their commitment to risk

Leaders must show confidence in taking on risk to achieve recovery objectives, while demonstrating a commitment to ongoing consideration of risk in the process. Leaders should show how risk is considered in making decisions, against risk appetite, continuing to prioritize risk management activities through planning and implementation, in pursuit of the objective.

Be considered and agile when deciding and acting

Leaders who set the right tone around risk are those who make informed decisions, and are willing to change course when warranted by new evidence. Leaders can build in rapid feedback loops to assess the impact of decisions on stakeholders, and they must be alert, responsive and humble, in acknowledging when there is a need to adapt accordingly.

Actively encouraging a diverse and inclusive environment

This enables consideration of alternative views to expose blind spots, consider broader impacts, and promote better decision-making, which is particularly important in times of uncertainty. Open collaborative discussion provides the opportunity to reinforce risk expectations and share insights, while listening to concerns that will help identify changing or emerging risks early.

As in all situations, risk and opportunity are two sides of the same coin. While risk culture is undergoing significant change during and after the crisis, there are several opportunities to intervene and shape the culture going forward.

The Board and Executive set the ‘tone’ shaping the way risk is managed in the organization. Regular, open and authentic communication from these levels has helped strengthen the culture and risk culture of many organizations through the pandemic. As organizations move to recovery, Executives and Boards will benefit from maintaining this communication style as they seek to cascade priorities and expectations.

While the tone at the top is vital, every leader has a role in shaping the risk culture. Virtual working places increases the importance on the role of all direct leaders, as people have less visibility of those they do not work directly with, and there is less exposure to symbols in the physical environment. The tone from above is set by the way each leader behaves and interacts with those around them.

Drawing on Deloitte’s research into ‘risk leadership’, there are opportunities for leaders to embed the appropriate risk mindsets and behaviors throughout the organization.

Every leader needs the capability to shape the risk culture for the new normal



Supporting others to consider risk in decision-making

Leaders can support their teams by providing tools and resources and creating a psychologically safe environment within the team for people to openly and constructively discuss risk-related (or any) concerns. Leaders may use analytical exercises to help with more structured decision making and improve the way people assess risk as a team, providing the chance to create new practices and behavioral norms that become the new way of working.

Embedding risk into the 'new normal'

Ultimately, the risk culture must empower people to take and manage risk effectively, with clarity of expectations and responsibilities. Leaders can continue to connect risk management with strategic objectives and setting clear boundaries to guide appropriate risk taking. People benefit from clarity of accountability through ongoing feedback, and recognition of 'how' things are done, as well as 'what' was achieved.

How well equipped are your leaders to shape the risk culture that will enable recovery?

- Do they know what 'good leadership' looks like to enable recovery, aligned to the organization's purpose, values, strategy and risk appetite?
- Are they committed to risk management among competing priorities?
- Do they have the capability and confidence to make decisions effectively in uncertainty?
- Do they know how to encourage diversity and inclusion to improve decisions, and effective identification and management of risk?
- Do they know how to create psychological safety to enable experimentation and learning from failure?
- Do they know how to facilitate effective risk management?
- Do they set clear expectations during times of change, holding themselves and others to account?
- Are they consistent in their management of consequences?
- Do they share lessons learnt openly and candidly so others can learn from their mistakes?

While outside influences present challenges, reduced connection with physical symbols and non-verbal cultural indicators means organizational culture is being carried predominantly in the conversations we have and the decisions we take. It is the quality of this communication and the way our decisions are made that will determine what the organization's culture looks like on the other side.

For the organization and people to thrive, improve mental health and risk culture simultaneously



To recover and then thrive beyond COVID-19, organizations need people experiencing positive states of mental health, able to take on challenge and make good risk-based decisions during times of high demand and stress.

Continuing to focus on the health and wellbeing of staff is a key pillar in maintaining a positive risk culture. COVID-19 has increased the risk of mental health and wellbeing issues for people arising from the accumulation of demands, such as increased uncertainty and insecurity, high workloads, new technology and social isolation. Many of these threats not only create significant risk to mental health, but also threaten people's ability to appropriately consider risk, make good decisions, and sustain performance over time to enable recovery.

Those working from home may experience more difficulty separating non-work demands from work demands (i.e., 'switching off'). Risks may bleed across from the professional to the personal and back again, such as living arrangements impacting the ability to maintain cyber security or confidentiality as easily. Working from home may also increase people's exposure to health and safety risks that may exist at home. For example, sadly many face greater exposure to domestic violence while working from home, and for others the blurred lines between work and home may increase the likelihood of drug and alcohol use.

Managing child-care and educational commitments will impact the availability of staff to maintain the same work routines and practices that they may have applied previously. Organizations will need to consider that work priorities, including risks may not receive the same priority as they would in a normal work context and understand how this might affect risk management.

To support good risk outcomes, it will be important to establish how they can best support employees across both spheres of life. However, a risk intelligent culture does not necessarily mean employees have good mental health, nor does a weaker risk culture correlate with poor mental health.

If mental health implications for staff result in a higher-than-normal incidence of time off, it may cause pressure and undermine the risk culture due to resourcing constraints. Similarly, there may be a reputation risk for organizations if they are associated with a stressed workforce and a high turnover, which will have adverse impacts for culture and risk culture.

While there can sometimes be trade-offs and tensions between addressing health and safety risk, and strengthening the risk culture, organizations will benefit from focusing on areas where the two objectives can be achieved simultaneously.

For the organization and people to thrive, improve mental health and risk culture simultaneously



Having a thriving workforce is also important for the ability of the organization to recover more quickly.

- **Meaning:** Mentally healthy work is often characterized by a sense of meaning. Creating feedback channels to help people see how their actions impact others, serving the organizational purpose, can increase meaning in the work, and help people understand the detrimental impacts of inappropriate risk taking.
- **Role clarity:** Clear definitions of role objectives, expectations and boundaries helps to reduce stress of ambiguity, builds confidence, and also aligns to supporting people take appropriate risks.
- **Authentic and optimistic communication:** Optimism is associated with higher levels of resilience and positive states of mental health, which can be enhanced through a clear and inspiring vision for the future. However, leaders should balance optimism about the future with timely and factual information about the risks, issues and challenges that lay ahead. This builds trust and empowerment needed to achieve the vision.
- **Psychological safety:** When people feel comfortable raising contradictory ideas or concerns without fear of judgement, they are more likely to openly discuss risks or issues, innovate and adapt to changing conditions. Similarly, psychological safety is also associated with people feeling more comfortable discussing personal concerns, which can lead to supportive interventions.
- **Connection:** Many businesses are adapting communications to suit the new medium such as increasing video rather than audio conferencing, holding regular check-ins focussed on personal connection rather than just work issues and seeking ways to support their teams through this period. This enhances feeling of social support and connection, while creating channels for open two-way communication about issues and risks.

Is your risk culture aligned with pathways to positive mental health?

- Do people understand and see how their work benefits others? Are they aware of any risks their work creates for others, and do they have the ability to reduce that risk?
- Do people receive regular communication that is authentic, transparent and articulates the unknowns?
- Do people have a voice where they can influence decisions, raise risks, issues and concerns openly without fear?
- Can people raise contradictory ideas or suggestions without fear?
- Do people feel they belong in the culture and remain connected to their colleagues, as the work environment continues to change?
- Do people feel confident and comfortable accessing mental health support services available?
- Do people feel safe speaking openly about mental health issues to ensure help can be provided?
- Can people readily access mental health support confidently and without fear from negative stigma?

Amidst the challenge ahead, lies opportunity to accelerate recovery, toward thriving



While rapidly changing risk profiles increase pressure and stress, there is great opportunity to create lasting change in the risk culture while the ramifications of risk failure are visible, tangible and relatable... to everyone.

As companies move out of crisis and into recovery, organizations willing to take on risk will thrive.

A risk intelligent culture is a strong enabler of recovery, allowing your organization to accelerate into the 'next, new normal'. For many organizations this requires a shift in the target culture, from conservative risk taking, to intelligent accepting of risk, finding comfort in the associated uncertainty.

Positive enablers of risk culture, such as the presence of an organizational purpose, consistent 'tone from the top and above' and a psychologically safe environment, have been key to successful COVID-19 responses.

When employees feel psychologically safe, they are able to perform at their best, take appropriate risk by experimenting, raising concerns early and learn quickly from failure by openly discussing mistakes. This adaptability is critical during times of uncertainty, volatility and challenge.

The decisions and actions of leaders during the crisis will be etched in the corporate memory for years to come.

A risk intelligent culture is one where employees know what appropriate risk taking is, and leaders play a critical role in ensuring this permeates through the workforce setting the right tone for risk taking in recovery.

Reflection on decisions and regular involvement of the risk function early in the process will also help organizations thrive.

As organizations emerge from the crisis and enter the 'next, new normal', firms need to shape the target risk culture with intent, regularly monitor progress, identify gaps, vulnerabilities and hot spots early, and take decisive action. Firms have the opportunity to emerge stronger than before, more adaptable and resilient to disruption, by enabling a risk intelligent culture. These firms will be those that accelerate from responding, to recovery, and are able to thrive for years to come.

How we can help

- Designing and applying culture and risk culture frameworks
- Measuring risk culture, including organization-wide and targeted deep dive assessments, and ongoing monitoring leveraging the full range of data available
- Developing culture and risk culture assessment capability, including within Internal Audit, Risk Teams, Human Resources, and other BUs
- Creating ethical frameworks to support ethical decision making, grounded in your values
- Developing Board and Executive capability to understand and monitor ethics, culture and risk culture
- Designing and implementing holistic culture transformation programs that bring together strategy, ethics and risk
- Supporting leaders and teams to uplift and shape culture through evidence-based leadership diagnostic tools and development programs
- Applying market leading advanced data analytics to identify hot spots, trends and emerging risks related to organizational and risk culture
- Mental health and wellbeing diagnostic tools and assessments; and uplift programs.

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