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MULTICULTURAL TEAMS LEAD TO SUCCESS (P10)

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COMPLIANCE AMBASSADORS WANTED!

by Mónica Ramírez Chimal



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"How are you going to ensure everyone in the company knows what compliance is? How can you be sure that everyone does the right thing? How can you make certain that you are informed of what is happening in the company?"

If you are a compliance professional, these questions should ring a bell for you. These are the difficult challenges compliance areas face. You may have the budget, you may deliver the training, but those are just parts. The other part is making people truly understand why complying with the law, the policies and procedures, as well as the code of ethics is important and how it can affect the company. To monitor effectively, you need a big team so they can move between the different areas, processes, and employees. And that is something

very difficult to carry out — and at certain points, simply impractical.

The compliance area has another challenge: If the company has a presence in different countries, the cultural factor should be taken into account. What could apply to the headquarters on one continent may not necessarily apply in another.

So, what to do?

You've heard it: Establish strategic alliances¹ with the other areas in the organization. Appointing compliance ambassadors will indeed help this initiative.

Design the what for your compliance ambassadors' project

The main objective is that compliance gains a wider scope (i.e., more presence throughout the company) and, incidentally, that the area is always informed of what is going on in the company. Of course this is no substitute for routine

meetings; however, it is a good way to have more eyes and ears around the company. Compliance ambassadors should:

1. Continue to regularly set the example, including by following external (e.g., laws, regulations) and internal (e.g., policies, procedures, code of ethics) compliance.
2. Report to compliance any suspicion of unethical behavior as well as any failures to comply with rules, when applicable.
3. Encourage colleagues to do the right thing.
4. Participate in the brainstorming effort when designing or updating training material. This task should be completed as required by the compliance area.

The first three occur during the compliance ambassadors' working hours, so there is no conflict with their daily tasks and a minimum of time should be invested. For the fourth task, a quick meeting can be held with the compliance ambassadors in order to hear their ideas and not affect their schedule.

This is not a task, but the compliance area can also provide a benefit (being generous with its ambassadors) by offering them the opportunity to be trained in useful things for their job role, such as communication skills, improved listening, and networking. Believe me; these topics are key for any job position in any type or size of company.

Identifying who will be ambassadors

Who is going to represent the compliance area? Who is the best candidate to be a compliance

ambassador? Consider the following:

- ◆ Check which person is an informal leader. There are many people that, without being in a leadership position (e.g., directors, managers, CEOs), hold power. People respect them. People trust them, so their word is always taken into account. These people would make ideal compliance ambassadors.
- ◆ Check those job positions that have access to key information: assistants; janitors and cleaners; the policeman in the front entrance, if applicable, who photocopies documents or the one who sees the security cameras; and even security guards! If you pay attention, those are the people who may, inadvertently, have access to relevant and sometimes confidential information. Appointing them as compliance ambassadors is a strategy to ensure you have people who can inform you if something bad or wrong is happening.
- ◆ Check those who are known to play by the rules. They could be from different areas and job levels. Getting them on board will mean you have a watchdog who oversees that others follow the rules.

After gathering all this information, compare the three lists: Is a particular person appearing in more than one of them? If so, that's the ideal candidate for compliance ambassador. If there aren't names appearing in more than one list, don't worry. Prioritize the lists according to those who are the most well-known people in the

company, those who are the most relevant people in terms of access to information, and those who comply with the rules. When doing this for the first time, the number of people is irrelevant. The important thing is to practice how to recruit people to become compliance ambassadors.

The compliance department should continue to treat all the other employees in the same way. ... Compliance must apply the rules equally to everyone.

How to get them on board

After choosing *who* the candidates are and determining *what* they are going to do, the next thing to do is invite them. You can talk with them, send an email, write a letter, or a mixture of these. Their tasks are already set.

The key point is how you are going to ask them. Use a nice, encouraging, and motivational message in order to explain that the compliance director or manager has chosen them to be part of this new project. Example:

"Your ethical behavior and/or leadership skills are outstanding when compared to those of other employees. This has drawn the compliance director's

attention. We need more people like you in this company. We would be honored to have you as a compliance ambassador.”

People like to be recognized for what they do. They are flattered that someone values what they are doing, so use that. You are going to help them have a greater sense of belonging to the company and compliance.

Afterwards, you can explain their tasks, emphasizing that there is no additional investment of time — only close communication.

The next steps

Make sure to be in contact with your ambassadors. If you don't hear from them for a while (let's say in one month), contact them. Try to establish a fluid conversation. You don't want them to think they should only report. This will provide an opportunity to maintain close communication.

Train your ambassadors in the compliance section (both external and internal) that applies to them, but most importantly, make sure they understand that they also set an example. Therefore, they should continue to be reliable people.

After this project has been working for a while, launch a campaign to get more compliance ambassadors. You can use: “We are looking for more exemplary people in compliance. Are you one of those people?” Include that ethical actions, behavior, commitment to the company, etc., are factors to be considered. Ask your compliance ambassadors if they think someone from their area is a viable candidate. The idea is to bring more compliance ambassadors on board.

Don't forget!

If you want your new compliance ambassadors to continue in their roles and this project to be effective, keep in mind that the compliance area must:

- ◆ **Always be available.**² If an ambassador has something to say and there is no one from compliance to talk with, or if the ambassador wants to talk and the compliance professional forces that person to put the report in writing, that won't work. Compliance has to be available all the time (this includes weekends and holidays), because unethical behavior, suspicions, and breaking the rules don't occur only during business hours. Make sure you are available in the way that you told your ambassadors you would be (e.g., mail, phone call, in person).
- ◆ **Handle all the reports (suspicion of unethical behaviors, breaking the rules, or even a comment) in a proper, timely, and professional manner.** Compliance has to be discreet and quick to take action. Otherwise, it will lose credibility, and the compliance ambassadors won't believe in the area. *Why report it if nothing is done? Why say it if the information becomes gossip?* You don't want that.
- ◆ **Always be consistent.** If compliance professionals are asking their ambassadors to set the example, all employees in the compliance department must do it. Everything said should be done. If, for example, training was offered to the compliance ambassadors, then it should be carried out.

This is very important: The compliance department should continue to treat all the other employees in the same way. The ambassadors are not the spoiled ones or the ones with privileges. Compliance must apply the rules equally to everyone.

- ◆ **Continue doing your own tasks.** Compliance ambassadors are not a substitute for compliance professionals completing their duties. The area should not stop listening to employees or stop going to meetings, nor should it ignore other alert mechanisms. Having ambassadors means more eyes and ears in the company, but even though they can be trained in several topics, they are not compliance experts.
- ◆ **Reward exemplary behaviors.** We are all used to raising our voice when something is done incorrectly, when someone makes a mistake. We forget the importance of recognizing when things are done well. If the compliance area does it, people can see that doing the right thing makes a difference. A win-win for everyone! And this will also motivate other employees to do the right thing.

The many benefits of compliance ambassadors

Compliance ambassadors help in many ways, including:

- ◆ They know, in detail, every part of the operation, so their feedback is more accurate.
- ◆ They know the people who surround them, so they can identify suspicious behaviors more easily.
- ◆ They have the power to set an example; their word is valued by others, so they can influence

other people to do the right thing.

- ◆ They can help with training and adjusting the content to reality. And in the case of questions, they can give a more accurate answer.
- ◆ They can inform compliance of anything that is happening in real time.

All these advantages can ensure that compliance is everywhere in the business at the same time — in real time — driving a compliance culture across the company. And this also includes breaking

the cultural barrier by having a local, accurate perspective rather than matters being subject to interpretations by someone who is not part of that culture.³

Having compliance ambassadors can also help the compliance area be more effective, better accepted, and have more people to support the right thing to do. But, make sure to do it correctly so that the next time compliance advertises “Compliance Ambassadors Wanted!” there is a long line of people waiting to take part. 

Endnotes

1. Mónica Ramírez Chimal, “Get the \$ for your budget,” *CEP Magazine*, February 2020, <https://bit.ly/2YV11Z0>.
2. Mónica Ramírez Chimal, “Oldies but goodies,” *CEP Magazine*, April 2016, 67–72, <https://bit.ly/31LT14M>.
3. “Live from the ECEI – Creating an Ethical Ambassador Community,” *The Compliance & Ethics Blog*, May 20, 2014, <https://bit.ly/34XBOHF>.

Takeaways

- ◆ Appointing compliance ambassadors can help the compliance team have a greater presence throughout the company and stay informed in real time.
- ◆ The best candidates for compliance ambassadors are informal leaders, employees who have access to key information, and those who play by the rules.
- ◆ Get the ambassador candidates on board with a nice, encouraging, and motivational message.
- ◆ The effectiveness of the compliance ambassador’s project relies on the compliance team being always available and consistent with directions.
- ◆ Compliance ambassadors know the operations in detail, are familiar with more employees (which helps to detect suspicious behavior), and help with cultural factors.

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