COMPLIANCE SEARCH

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MORE ABOUT ME

If you could tell your past self one thing, what would it be? Listen longer, listen better.

The interview for your dream job ends with a solo karaoke performance – which song would you perform?

"My Shot" from Hamilton. Gotta let them know you want it!

What is the most beautiful place you've ever seen in person?

I love the National Parks; I found Sequoia National Park particularly awe-inspiring. Three-thousand-year-old trees put your problems in perspective.

What is your biggest ever extravagance?

With our kids spread out a bit age-wise, we've said "yes" to Disney World a few times...



Asked & Answered

THE SECRET SAUCE OF COMPLIANCE

What is your secret sauce for compliance?

Proactive versus reactive, supported by collaborative relationships between key stakeholders. Compliance is one of several risk related functions in an organization alongside audit, risk and HR and each have somewhat different missions, though they each have a strong risk reduction component. Too often these functions are locked in silos or are actively competing for attention and resources.

It is essential for compliance teams to take the lead in sharing and collaboration - annual compliance plans should be shared with other risk related groups. For example, do recent investigations suggest changes in next year's audit plans or could HR engagement survey data or recent employee turnover information aid in in another group's planning?

While data sharing is not uncommon, I think it's often ad hoc and inconsistent. How often do compliance and audit professionals discuss next year's business plans while they're still in draft as opposed to being shared only at the top of the organization when it's too late to recognize any shared goals or synergy?

To what extent are you concerned about Compliance Officer liability? The potential of personal liability requires the same kind of self-reflection as any competent CFO or Controller exercises when certifying financial statements.

Which means that as liability or exposure goes up, so must the influence and authority of the Chief Compliance leader. So, while liability is a concern (and insisting on Directors or similar insurance appropriate), I also think it's a useful discussion point for raising the profile of the program. It's a compelling argument for stronger compliance resources and personnel.

What is the ideal relationship between Compliance and Legal teams? Respectful independence and collaboration. Whether or not compliance is embedded in legal, it's crucial that each acknowledges the distinction between their missions and the shared obligation to reduce risk.

In the best possible scenario, legal and compliance present their analysis of complicated issues to leadership in a way that allows the business to make informed risk decisions without a lot of off-line lobbying.

Sometimes, positions will align, sometimes there will be differences. For example, compliance may advocate for the long-term value of sharing certain lessons learned more broadly while legal sees some potential liability risk in doing so. Mature teams shouldn't fear presenting the case and letting the business make an educated decision.

How can a compliance and ethics team work to prevent political polarization and conflict in the workplace?

The difficulty in striking the balance between the comfort level of employees from diverse backgrounds and often sharply different personal viewpoints has become increasingly challenging. I think aligning expectations with the organization's purpose and vision is a good start. Highlighting the value of both respectful discourse and avoiding topics where discussion isn't productive (and in fact may be perceived as a personal attack), is something that can and should be included in workplace conduct training.

Working closely with the HR teams who most often deal with these issues in real time, including providing talking points or informal consultation can go a long way towards keeping things from getting out of hand.

To what extent should a compliance and ethics program have coverage of off-channel communications?

In terms of "business communications" via text or other apps, you need a policy and reasonable expectations. If you tell folks, "no business texts on your personal phone ever" and don't give them a company phone, your policy will be violated on day one and forever after, so be realistic. Discourage business texts, but make capturing and uploading them easy when they do happen. Make it simple, clear and provide training.

Regarding the extension of ethical conduct expectations to personal use of social media or other channels, it depends on the business. In a world where anything on-line is likely to become public, expectations of behavior should be framed in terms of an organization's values. It should not be about politics or other areas where people can reasonably differ, but if employees get personal, mean, and abusive online, that presents real culture risk within the company and reputational risk outside. Never underestimate the ability of customers to split screen your values proclamations with ill-considered posts from employees or other key stakeholders. Proactive training that emphasizes the practical interests of the company (as opposed to any interest in thought censorship) is key.

If you weren't a compliance professional, what would you be and why? A writer/novelist (or I'd try to be). Storytelling is the universal communication device and I love crafting the story around an important idea. Strong storytelling has been key to my most successful projects and business relationships.

I tried a lot of cases to juries early in my career and learned it's the story behind what happened that keeps a tough audience interested. No matter how complex or important the idea, framing it with a compelling story raises the odds of understanding and adoption. All great leaders know this – including compliance professionals.

THE POLL RESULTS

We asked.....

Have you ever told a company that you're willing to relocate for a job to avoid rejection, but plan to negotiate on that if offered?

Yes

76%

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