

CEP Magazine – November 2020 'Championing' your compliance program

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For those compliance leaders with the budget and capability to hire full-time, dedicated compliance professionals in every region and at every site in which your business operates ... read no further. (You are one of the few and lucky ones!) For the rest, who may struggle to add compliance head count or to convince management of the value of compliance that cannot be easily seen on a quarterly report or stock price ... read on.

Most companies do not have the resources nor the perceived necessity to hire a full-time compliance professional in every region and at every site around the world, nor to embed a compliance professional within every department. Enter the role of compliance *champions*, also commonly referred to as compliance *ambassadors*, *liaisons*, or *focals* (pick your nickname!), which can be a useful resource for filling in any compliance gaps within an organization and creating greater compliance presence and awareness throughout the company.

Having a greater compliance presence throughout your company likely contributes to local employee engagement; creates greater awareness of compliance policies, touchpoints, and responsibilities across all employees, sites, and relevant departments; and helps a centralized and dedicated compliance team remain aware of concerns or potential violations. Using knowledgeable, local employees to serve as part-time compliance champions (in addition to their day-to-day jobs) is a way to address the issue of limited resources while achieving the goal of having a larger compliance presence and increased compliance awareness throughout the company. A *champions network* allows compliance leaders to take on extra, informal head count (without the impact on budget) and provides them with the eyes and ears to keep ahead of local compliance concerns that might otherwise go unnoticed and unresolved.

Compliance networks and champions can be used across compliance fields, including ethics, privacy, export controls, health and safety, etc. Regardless of the substantive area, this article lays out the key ideas and actions when working to develop and implement a champions network within your company, or to grow and evolve an existing champions network.

Get commitment from management

As with most compliance initiatives or projects, transparency and notice to the business are key. The worst thing you can do is spend months of hard work developing a well-defined and structured champions network only to receive pushback, concern, and negative feedback from the business *after* its implementation. Therefore, you should be working with management and all relevant departments within the business *before and during* your development of the program in order to receive their input and their commitment.

Asking an employee to take on additional compliance responsibilities takes away from their day-to-day responsibilities—this can, understandably, be poorly received by their managers and department heads. It's your job as a compliance leader to make clear the value of added compliance responsibilities to that employee's manager and department. Ensure that management and the heads of all relevant departments are aware of the

planned implementation of a champions network and encourage them to provide input before and during the implementation process. Commitment from management ahead of time mitigates the risk of potential conflict or pushback down the road when employees are being asked to fulfill their responsibilities as newly appointed champions.

Create incentives

The idea of financially incentivizing employees to be compliant can be viewed negatively by many CEOs— “Why would we pay employees *extra* to follow the law and company policy?” However, it is important to keep in mind that the role of compliance champions demands that they go *beyond* their normal job responsibilities (including their own obligation to remain compliant in day-to-day activities) by helping create broader compliance awareness, disseminate compliance policies, report compliance concerns, etc. If you have the opportunity to create financial incentives, such incentives can be very persuasive in encouraging employees to volunteer to serve as champions. Consider working with management and human resources to develop a bonus structure or a rewards program for those champions who not only fill the role but who also actively engage and succeed in their roles, as determined by their managers and compliance leaders.

However, incentives do not necessarily have to be monetary. Stressing the value of helping to protect their company and themselves, as well as the value in being seen as a trusted leader within their own region, site, or team may be enough of an incentive for many employees to voluntarily take on the champion role. As Paul H. Zietsman states in his recent article, “Risk management starts with the employees”:

At the core of employees’ needs is the desire to have access to and the support of a trusted advisor, to know that someone is looking out for them, helping them do the right thing and stay out of trouble.... Employees want to know that compliance is not there only for the corporation, but for them as well.^[1]

In this regard, the compliance leader of a champions network can serve to provide the “support of a trusted advisor” to champions, and in turn, such champions can take on the trusted advisor role for their colleagues. Whether the incentives are financial or altruistic, making employees aware of the value in serving as a champion can only help to grow and retain your champions network.

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