**What I Wish Someone Would Have Told Me**

With **Carrie Penman**

Chief Compliance Officer and SVP, Advisory Services, NAVEX Global

**On My First Day as an Ethics Officer**

**Talk to leadership before jumping in.** Go meet with business leadership before you start to roll out your program. They will definitely have an opinion about what you plan to ask their employees to do. Things will go much more smoothly when you get buy-in from organizational leaders at a point when they feel like they have a say in helping shape the program, rather than having a program thrust upon them.

**Make friends with other functional groups and don’t try to reinvent the wheel.** If your organization already has an annual survey, consider adding questions to the existing process rather than rolling out a new one right away.

**Make friends with audit.** They are your eyes and ears on the ground at all of your locations and most especially the remote ones. They are a great group to gather feedback on the effectiveness of your program. When auditors ask questions about ethics and compliance while they are doing a financial review, the organization sends a message that “how” something is achieved is as important as “what” is achieved.

**Don’t get hung up on where you sit – use it to your advantage**. If your office or seating arrangement is comparable to your peers – great. If it is not, use that arrangement to get to know other departments and different levels of the organization. On the other hand, if your office is by yourself in a rented trailer in the back parking lot, there may be a message there to re-evaluate whether you should have taken the position.

**Before Entering My First Board Meeting**

Be prepared. Know what you are going to talk about and then talk about it efficiently. Give your board context. Don’t just throw a bunch of numbers at them. You don’t want to overwhelm them, but only provide the most crucial and relevant content to them.

Specifically talk to your board about risk as opposed to training records. And keep your message outcome-driven so that they can easily tie your program to organizational goals.

Finally, it should all look good. Your presentation itself should look and feel consistent, illustrate data when possible and capture the attention of this valuable audience.

**The First Time I Was Asked to Explain the ROI of Compliance**

The best answer is a mixture of science and art. Gather key data points that are indicators of program effectiveness. These could include your surveys, benchmarks, attestations, audit results and HR statistics. That’s the science part. Next you need the art. ROI is a story of effectiveness. You can have all the data in the world but if it’s not packaged in a way that makes sense to whomever is your audience, it will fall on deaf ears. And remember to trust the “soft side” of data gathering. Your intuition on how leadership in various locations is responding to and supporting your program is a key data point in your analysis. Think about how leaders respond to your calls. Are you welcome to join staff meetings to discuss the program and gather feedback? Do employees check back on the process and outcomes of reports to the hotline?

**When I Was Learning to Navigate across Departments**

Create allies and build trust at a variety of department levels. Learn and exercise organizational intelligence. Identify key influencers and decision makers who you will need to work with on a regular basis to keep your program running smoothly. Ensure you have a good working relationship with those below the top person in each group because a change in one key person could set back good progress if there isn’t a backup set of relationships.

Recognize that change tolerances vary. Managing compliance is very much about managing people, their expectations and their buy-in into program goals.

**When I First Realized Just How Much Work Ethics and Compliance Was Going to Be**

Institutionalize your processes. Although you are the ethics and compliance officer, you are not responsible for *all* ethics and compliance at your organization. Work toward creating a culture rather than just enforcing compliance. Culture always wins. So make sure you invest time in managing a culture as well as individual instances. Set ambitious goals with realistic success measures.

**About Carrie Penman**

Carrie Penman is the Chief Compliance Officer of NAVEX Global and Senior Vice President, Advisory Services. Carrie has been with NAVEX Global since 2003 after serving four years as deputy director of the Ethics and Compliance Officer Association (ECOA). Carrie was one of the earliest ethics officers in America. She is a scientist who developed and directed the first corporate-wide global ethics program at Westinghouse Electric Corporation.

Since joining NAVEX Global, she has conducted numerous program, risk and culture assessment projects globally for its clients and regularly works with and trains boards of directors and executive teams. She also serves as a corporate monitor and independent consultant for companies with government agreements. She is the author of numerous compliance related articles and commentary and is regularly featured or quoted as a compliance expert in press and publications. Carrie was also featured in the Wall Street Journal’s Risk and Compliance Journal and was recently awarded the 2017 Carol R. Marshall Award for Innovation in Ethics by the Ethics and Compliance Initiative.

As Chief Compliance Officer, she oversees NAVEX Global’s internal ethics and compliance activities employing many of the best practices that we recommend to our clients.