
Ethics Mirror Survey CCO & CEO

“Doing the right thing when no one is watching you”

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Date: May 12th, 2016



Context:

ETHICS, the International Society of Healthcare Ethics and Compliance Professionals (www.ethicspros.com), has decided to conduct a study with pharmaceutical and medical device manufacturers to help its members to better understand:

- the issues and challenges of Ethics / Compliance functions;
- their positioning in organizations;
- the outlook for these functions in the years to come.

Thinking Compliance

The words that embody « compliance » at best:



According to CCO*



According to CEO*

**We extracted the most recurring themes from the answers given to the question "What are the three words coming to your mind when compliance is at stake?"*

Defining compliance... in 30 seconds

“Compliance is doing the right thing when no one is watching you.”

Follow the law and foster internal ethics culture:

CCO

- “Ensuring adherence to all policies, standards, laws and regulations which concerns our business through the creation of a culture of ethics”
- “Governance and risk management”

CEO

- “To work while complying with local and internal rules”
- “To make sure that we operate everywhere in accordance with market rules, antitrust law (...)”

Protect the employees and the patient:

CCO

- “Support our patients, community”
- “To protect the professionals”

CEO

- “To make sure our success is made with respect to the environment and the patient.”
- “Ability to deliver quality to our customer/patient safety.”

CCO & CEO aligned on the difference between compliance and ethics

CCO: *“The main difference for us is not what you must do (it’s a given) but what we should do” :
“from doing things right to doing the right things”*

Compliance:

- “Follow all the rules and regulations”
- “Compliance is how you implement your values”
- “Compliance is more about rules and the way to operate.”

Ethics:

- “Close but ethics goes beyond. Would you be proud of what you did? The stomach ache test.”
- “It’s more than law even if you comply with the law you may not be perceived very ethical”.
- “We don’t use the word “ethics” we rather use the word “integrity” which means doing the right thing even if no one is watching”.

Compliance as a strategic tool

“Compliance is even a sales weapon.”

Integration with the business at every stage:

CCO

- “Compliance is the way you do business. It is totally included in the strategy.”

CEO

- “It’s a strategic tool. Managing compliance is key for our business.”

Reputation:

CCO

- “Major impact on the reputation.”
- “We are consulted about how to interact with patients.”

CEO

- “We’re obliged to serve the patient the best we can and be highly respected”
- “Brand image of our company.”

Compliance as a strategic tool (continued)

“Compliance is even a sales weapon.”

Up front participation:

CCO

- “Compliance is built in our business and compliance needs to participate up front part”

CEO

- “We need a multi disciplinary approach to face new challenges.”

Talent retention:

CCO

- “New risk: burnout, employees stress. We can detect and help them. Compliance is a strategy of talent retention.”

CEO

- “Brand image of our employees.”

Compliance as a competitive tool

“According to you, what would make compliance a competitive tool?”

Reputation/ branding:

- CCO: “It increases our brand in the market, help us attract talent”

Differentiation:

- CCO: “Competitive advantage: in public tenders it helps because it proves that our business is clean even if we’re not the cheapest.”

Investigate risks:

- CCO: “Our ability to investigate risks is a competitive advantage”

Helps to get deals

Communication

CCO's most appropriate person to report to

Agreement between them:

- CEO
- GC
- Board (CEO)

CCO: "It depends on the culture as soon as compliance has a different team from legal. I could report to legal without problem."

CCO: "Reporting to the CEO is mandatory in order to be independent and have the authority"

CCO: "Compliance and legal should be aligned they are both side, of a flip coin. So CCO should report to GC into reports to CEO."

CEO: "CCO should report to the board"

Skills required to be a good CCO

According to CCO*



According to CEO*



**We extracted the most recurring themes from the answers given to the question "What are the skills required to be a good CCO?"*

Compliance departments future challenges

“To do the right thing, we need to pay more attention at what we do and how we do it”

“Deal with new stakeholders (patients, gov, officials, etc.)”
(CCO)

“Ability to deal with innovation and stake holders new concerns” (CEO)

“Anti corruption, conflict of interest, Data privacy, Transparency” (CCO)

“Stay compliant with new regulations” (CEO)

“Successfully integrate compliance with our entire organization after our last acquisition” (CCO)

“To be recognized in a profound and homogeneous way” (CCO)

“Get in the DNA of the company” (CEO)

“To shape tomorrow’s CEO” (CCO)

How to evaluate compliance's success?

"To do the right thing, we need to pay more attention at what we do and how we do it"

Qualitative Evaluation:

"To take part in the corporate strategic matters." (CCO)

"Prevention, training, monitoring. Not easy to develop a dashboard" (CCO)

"How we work together as a team to solve our patients problem in a collaborative way. How well do we do in training our people. How people speak about compliance. Setting clean timeframe." (CEO)

"Dialog, culture, behavior." (CEO)

H&S

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