How to Communicate and Collaborate with Colleagues in Related Functions and Departments

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The statements made by the presenters during this session represent their individual views and should not be construed to represent the views of their respective organizations.
To Whom We Communicate

- CEO and Board
- Audit Committee
- Compliance Committee
- Senior Management
- Regional/Business Unit Compliance Colleagues
- Business Unit Leaders
- Commercial Operations
- R&D/Medical Affairs
- Employees
- Legal
- Finance
- Internal Audit
- Human Resources
- EHS
- Security/Site Services
- JV/Co-promotion Partners
- External Parties
  - Vendors
  - HCP Consultants
  - Government Agencies
Why Communicate and Collaborate

- Build trust
- Create opportunity for dialogue
- Create awareness
- Build consensus
- Ensure high level of engagement
- Encourage ownership & accountability
- Establish shared responsibility
- Educate
What We Communicate

- Code of Conduct
- Policies, procedures and processes
- Availability of reporting mechanisms
- Compliance risks and responsive strategies
- Training and refreshers
- Legal, regulatory & compliance updates
- Real life examples from investigations, audits and monitoring
- Surveys
How We Communicate and Collaborate

- Reports to Board Committees and Senior Management
- Compliance risk assessment
- Investigation/Monitoring reports and trend analysis
- Attendance at internal meetings
- Cross-disciplinary project teams
- Consensus meetings
- Training and FAQs
- Mass mailers
- Awareness campaigns (posters, tri-folds, etc.)
- Outside conferences/Professional development
Communication and Collaboration: A Practical Example – U.S. Project

- Legal and Regulatory Risk Assessment
- Internal Resources
  - Compliance
  - Legal
  - Finance
  - Regulatory
- External Resources, Investigations/Auditing
- Develop Risk Register
  - Likelihood/Impact Ranking
  - Evaluate Effectiveness of Controls
- Develop Annual Monitoring/Auditing Plan
- Review with U.S. Compliance Committee
Communication and Collaboration: A Practical Example – Global Project

Code of Conduct Revision

- Bi-annual publication of Code
- Engage cross-functional team
  - Legal
  - Compliance
  - Business
- Obtain internal/external perspectives
- Engage subject matter experts
  - Internal reviewers
  - Internal logistics
  - External vendors
- Revise Code accordingly
- Circulate for internal review and approval
- Present draft for Board comment

- Begin preparing training
- Final draft to Board for approval
- Upon approval, U.S. distribution and training begins
- International
  - Code translated: 21 languages
  - Internal reviewers validate translations
  - Code distribution
    - Electronic – translated
    - Hard copy – English only
- Training
  - e-Learning system
  - Manager-led
Results of Poor Communication and Collaboration

- Lack of trust
- Lack of knowledge and engagement
- Lack of accountability
- Breakdown of compliance program elements
- Inefficiency/duplication of efforts
- Potential increase in compliance violations
- Government investigations
  - CIA/DPA
  - Fines/Penalties
  - Potential Exclusion
Questions?