



14. Ensure compliance and integrity are taken into account in decision-making

Challenge

How can you ensure that integrity is structurally included in decision-making processes? It is not so much about involving the compliance professional, but rather about making compliance and integrity part of the process, in order to promote balanced decision-making.

Solution

Ensure that the relevant first and second-line risk disciplines (risk management, security, compliance) have an early role in decision-making processes. Not so much through representation in decision-making forums, but already in the preparation so that attention is paid to compliance and integrity in the decision-making process. As a compliance officer, you can advise, challenge, point out risks and opportunities.

Conditions for this are:

- Commitment of the highest decision maker; it should pay explicit attention to the fact that integrity is taken into account in the decision-making process when preparing and communicating decisions;
- Recording compliance and integrity considerations; at all points in the decision-making process where compliance and integrity are discussed, it must be recorded which consideration has been made (for example, which dilemma arose, which decision was taken and why);
- Commitment of (middle) management and other employees;
- Adequate governance that ensures representation of diverse stakeholders;
- Setting up a reporting structure (e.g. recording minutes or a certain decision-making format) in which all considerations are mandatory (for example, by including an explicit paragraph in policy notes).

Actors

- Decision makers
- Decision-making preparers
- Compliance professional



Techniques

Informing, connecting and convincing is important here. Where possible, formalize the decision-making process, for example in product approval process, client acceptance process and in governance. For other decision-making in a broad sense, keep in touch with decision-makers and decision-makers, in full breadth, from the start of the process, together with other risk disciplines (security, privacy, ERM, ORM, quality and possibly also IAD in third line), but also, if applicable, other internal stakeholders with other interests, such as the works council, HR etc. Carry out spot checks, possibly in consultation with Internal Audit.

Role Compliance Professional

Initiator, coordinator.