CEP Magazine - January 2019
How to create a compliance and ethics committee

by Edye Edens

Edye Edens JD, MA, CIP (edye.edens@firstclasssolutions.com) is Senior Research Compliance Consultant at First Class Solutions, Inc., in Maryland Heights, Missouri, USA.

- firstclasssolutions.com/
- linkedin.com/in/edye-taylor-edens-18050a15

Whether the creation of a compliance and ethics committee is required by regulation, a result of audit findings, or a proactive idea to reinforce an ethical and compliant culture in the workplace, bringing the committee to fruition is a massive undertaking. Often individuals have fantastic visions of the gap this committee can fill, but don't know where to begin or haven't accounted for all the gritty details that come with the creation and oversight of such a mechanism. This article aims to pare down some of these gritty and cumbersome details in a realistic fashion to provide a strong starting point for professionals who are tasked with such an assignment.

What is your purpose? Be honest.

Is this committee being created to provide you, as the compliance professional, with resources and depth? Or is the committee intended to resolve an existing problem? Is the creation of this committee a politically charged situation? What's the institutional history behind committees such as this one?

I could spend the entire article peppering you with questions, but I'm guessing you understand my premise. Providing honest context to the creation of this committee will guide you through answering all the following questions in a productive fashion that keeps your goals in check and realistic for your given industry and situation.

How much support do you have?

Performing a transparent evaluation as to how much support is needed versus how much you currently possess tells you not only what your scope and expectations look like for this committee, but also how much marketing you will need to wrap into building your committee. Ask the hard questions, and know your answers, such as whether your committee truly has teeth, and how big said teeth are or are not. Don't view the need of more support as daunting or uphill. Rather, no project can ever conjure enough support, and that's just a given component to your work. Again, focus on classifying your support into groups such as "must-have" versus "bonus," and view this entire list of questions as merely a fact-finding mission. You don't have to make any heavy and hard decisions until all the data is gathered.

Who are your stakeholders?

This step will be more specific depending on your industry, and even more specific to your role, then most specific to your individual organization. Stakeholders can be anyone from the literal client to the business, and you must be clear about each and every one of them as they tie to your committee. For example, my industry is research compliance, so if I was in-house at an organization conducting research, my stakeholders could be everyone from providers, researchers, subjects, patients, fellow compliance colleagues, and so on. If you are in any way a visual learner, I sincerely recommend drawing out these relationships and their connections to the mission of your committee. Completing this step fully ensures you can then best move on to the appropriate model and membership.