

Compliance & Ethics Professional

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General Counsel & Chief Compliance Officer,
ISK Americas Incorporated
in Concord, OH

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Can you get compliance without ethics?

An interview with **Diane Nobles**, (Diane.Nobles@Walgreens.com),
Global Chief Compliance and Privacy Officer, Walgreens Boots Alliance.

Steve: Diane, you are Chief Compliance Officer in a complicated business that operates medical clinics, formulates and dispenses regulated drugs, and sells to millions of customers in 25 countries. Simply complying with all the laws and regulations you face is a huge challenge. How can you even begin to think about ethics?



Priest

Diane: Actually I think about it quite often. Without ethics in the equation, you don't reach a complete result. Here is how I think about it. "Compliance" tends to be about rules and boundaries, which is helpful, but if that is your exclusive focus, you will miss some important pieces of the bigger picture. "Ethics" is about behavior; about what you do when the rules aren't clear, which is more often the case.

Steve: Does this make any difference in the way you actually implement your compliance program?

Diane: Without a focus on ethics, the end will always justify the means. Every organization operates by values and principles, a moral code—whether these are committed to in writing or just widely understood. Behaving in a way that is consistent with those values and principles is where I see ethics in play. How many times have you seen action that is legal, but doesn't feel ethical? You know that the action at hand is not consistent with your internal values.

Steve: I agree. Many great organizations have been embarrassed and lost billions of dollars, because people who may have been complying with a rule failed to see the negative implications of their actions on customers. However, there are also examples where actions that intuitively seem ethical violate a law. How do you promote both?

Diane: This is where the training and education that the compliance team develops and implements is especially critical. There are instances, particularly in healthcare, where following your intuition will produce an unintended result. It is really important to understand the principles that underpin many of our healthcare laws and regulations. It is equally important for our employees to remember that a significant amount of the work we do in the healthcare space involves a "triangle" of provider/patient/payer. The interests of all three parties must be considered, and this is where intuition, which often doesn't adequately account for the payer interest, can be problematic.

Steve: And when the payer is a government entity, as is often the case for Walgreens, it is even more challenging. Thanks for sharing the Walgreens approach to bringing ethics and compliance to a very complicated business. *

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