



**Rethink**  
Compliance

# Real Talk:

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Policy Management Headaches  
and How to Avoid Them

# Introductions

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**Andrea Falcione**

Chief Ethics and  
Compliance Officer &  
Head of Advisory  
Services

Rethink Compliance



**Desiree Ramirez**

Executive Vice President,  
Chief Integrity and  
Privacy Officer

University of North Texas  
Health Science Center



**Alex Killian**

Compliance Attorney  
Ford Motor Company



# About Rethink Compliance



## We are proud of Rethink's many accomplishments:

- We are a certified women-owned business by the Women's Business Enterprise National Council (WBENC).
- We were named an Inc. 5000 fastest growing small business, two years in a row:
  - *Ranked 1679 for our 370% three-year growth*
  - *Ranked 160 in Business Products & Services*
- Our three primary principals are members of the EY Entrepreneurial Winning Women™ class of 2021.
- Our founder, literally, wrote the book on compliance training ("*Creating Great Compliance Training in the Digital World*").

**We put people at the center of all we do.**

And it shows through our unparalleled passion, dedication to service, and tangible results.





THE UNIVERSITY *of* NORTH TEXAS  
HEALTH SCIENCE CENTER *at* FORT WORTH

- Founded in 1970 as the Texas College of Osteopathic Medicine (TCOM), **The University of North Texas Health Science Center at Fort Worth (HSC)** is a values-based university located in the heart of Fort Worth’s Cultural District. With six colleges on one campus. HSC educates future health care providers, public health professionals, researchers and scientists to create solutions for a healthier community.
  - President Dr. Sylvia Trent-Adams
  - Purpose: **“Transform lives in order to improve the lives of others.”**
  - Values: **Courageous Integrity. Be Curious. We Care. Better Together. Show Your Fire.**
- **6 Areas of study**
  - Texas College of Osteopathic Medicine, School of Biomedical Sciences, School of Public Health, School of Health Professions, College of Pharmacy, College of Nursing
- **Areas of Strength**
  - Center for Human Identification, Center for Health Policy, North Texas Eye Research Institute, Institute for Health Disparities, Institute for Translational Research, Whole Health
- **The Office of Institutional Integrity and Awareness** creates an integrity-based approach program that emphasizes responsibility for ethical behavior and commitment to our [Code of Culture](#). By utilizing this proactive approach, we demonstrate the consistency of our values in action with choices and decisions as an institution and individually.

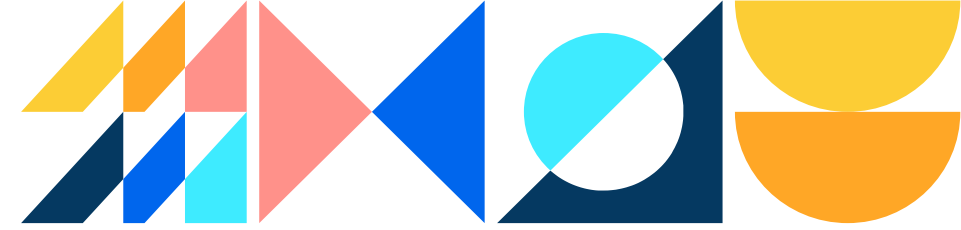
# About Ford Motor Company

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- Publicly traded American automotive manufacturer founded in 1903
- Includes the name brands of Ford and Lincoln
- Operations in over 125 countries
- Ford Credit is the customer financing subsidiary
- Around 186,000 employees globally





# Agenda

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- 01 Policy Primer: Location, Content, and Ease of Use
- 02 Policy Updates and Effective Policy Management Plans
- 03 Policy Management Transformation at HSC and Ford



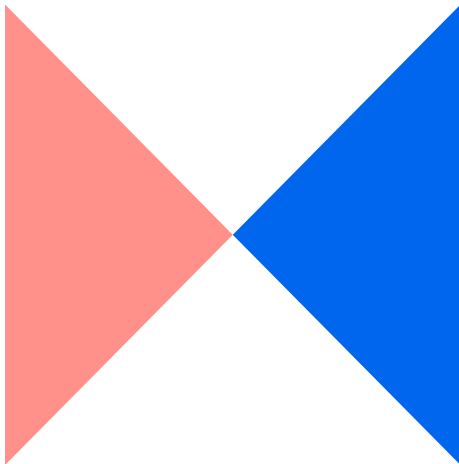


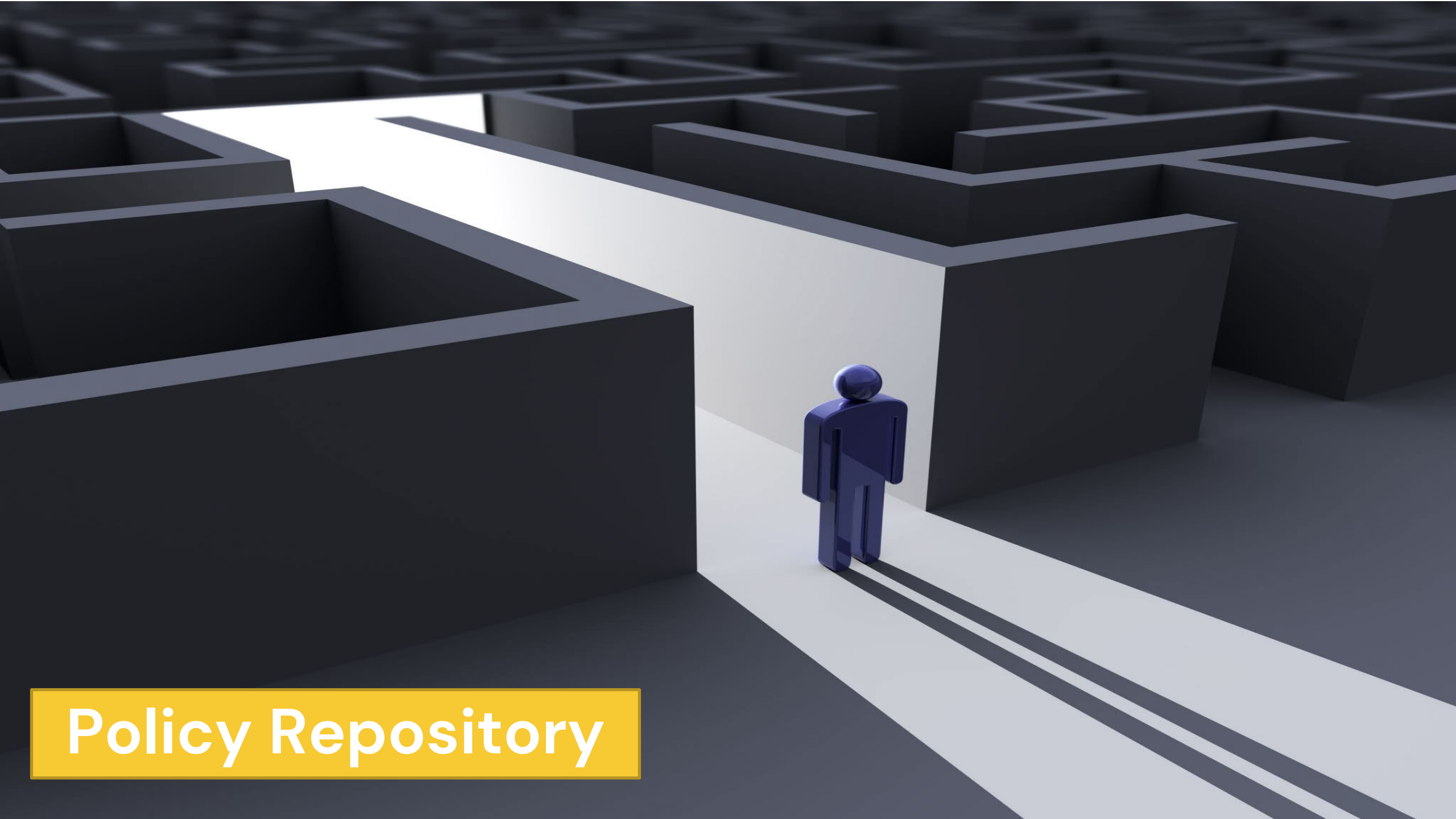
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01

# Policy Primer: Location, Content, and Ease of Use





**Policy Repository**





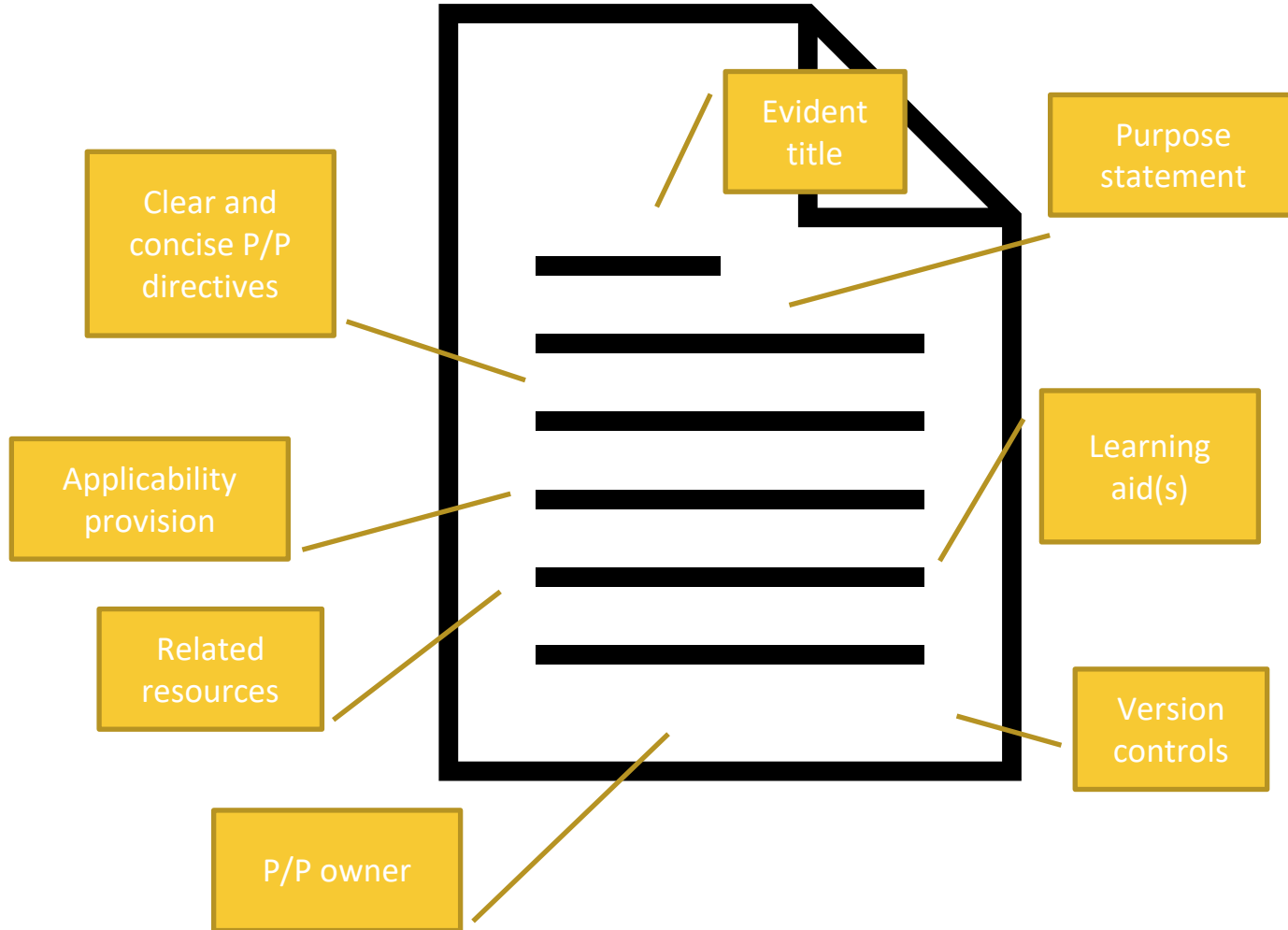
# Polling Question #1

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**Q1:** Does your organization maintain its compliance policies in a universally accessible policy repository?

- Yes
- No
- Don't know

# Policy Content: Must Haves



# User Feedback

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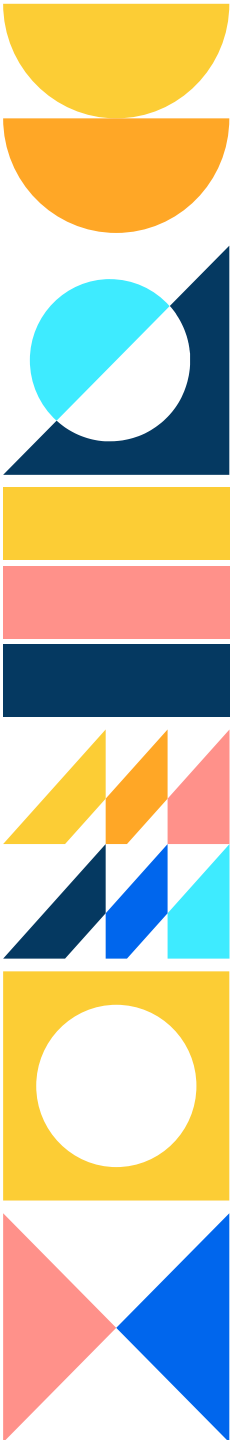


## Polling Question #2

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**Q2:** Have you ever sought user feedback on your organization's compliance policies?

- Yes
- No




## Ease of Use

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P&Ps  $\neq$  Codes!

But maybe they should!

# An Example

<p>Whistleblower Policy   Introduction</p> <h2>1 Introduction</h2> <p><b>Purpose</b> At Deloitte, we are committed to the highest levels of ethics and integrity in the way that we do business. We understand that this is crucial to our continued success and reputation.</p> <p>Our Shared Values, <a href="#">Principles of Business Conduct</a>, and policies guide our everyday conduct. We have a professional responsibility to speak up and report unethical behaviour.</p> <p>Deloitte's Whistleblower Policy (Policy) is an important element in detecting corrupt, illegal or other undesirable conduct. Deloitte strongly encourages you to speak up if you suspect or witness any matters of concern. Deloitte will take all reports made under this Policy seriously.</p> <p>This Policy describes the protections available to whistleblowers, what matters are reportable, how you can report your concerns without fear of Detriment, and how Deloitte will support and protect you.</p> <p><b>Background</b> We have developed this Policy, having regard to the relevant legal requirements and current best practices relating to the protection of whistleblowers in the Corporations Act 2001 (Cth), Taxation Administration Act 1953 (Cth) and ASIC's Regulatory Guide 270 Whistleblower Policies.</p> <p>The Whistleblower Management Plan (Plan) supports our Whistleblower Policy. It provides further information on how Deloitte will implement the Policy, including guidance for the various roles involved in managing Whistleblower Reports, including the:</p> <ul style="list-style-type: none"><li>• Whistleblower Report Officer (WRO)</li><li>• Whistleblower Investigation Officer (WIO)</li><li>• Whistleblower Protection Officer (WPO)</li><li>• Whistleblower Committee (WB Committee); and</li><li>• Whistleblower Policy Owner (WB Policy Owner).</li></ul> <p>Unless expressly stated otherwise, all capitalised terms in the Policy have the meaning given to them in Section 6 "Definitions".</p> <p>4</p>	<p>Whistleblower Policy   Introduction</p> <p>Examples of Reportable Conduct include but are not limited to:</p> <ul style="list-style-type: none"><li>• illegal conduct, such as theft, violence or threatened violence, and criminal damage against property;</li><li>• fraud, money laundering or misappropriation of funds;</li><li>• offering or accepting a bribe;</li><li>• financial irregularities;</li><li>• failure to comply with, or breach of, legal or regulatory requirements; and</li><li>• engaging in or threatening to engage in Detrimental Conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.</li></ul> <p>Reportable Conduct <b>excludes</b> personal work-related grievances as described below.</p> <p><b>Personal work-related grievances</b> A personal work-related grievance is a report of behavior that has implications for the discloser personally and does not have significant implications for Deloitte (that do not relate to you). Examples include:</p> <ul style="list-style-type: none"><li>• an interpersonal conflict between you and another Employee, or</li><li>• a decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action.</li></ul> <p>Personal work-related grievances do not qualify for protection under the Whistleblower Laws or this Policy. Personal work-related grievances must be raised with your Partner, Coach or Talent representative.</p> <p><b>Accessibility of Policy</b> This Policy is available to all current partners and Employees internally on the Ethics and Integrity Hub DAIS webpage. Other Eligible Whistleblowers can access this Policy on the Deloitte external website.</p> <p><b>I need further information about this Policy</b> Employees can seek confidential information on the operation of this Policy and how a disclosure will be handled, without making a disclosure, by contacting the Office of General Counsel, Ethics Officer and/or the Conduct Leader.</p> <p>However, if you require legal advice with respect to your obligations under this Policy or the Whistleblower Laws, then you must contact an external lawyer (not the Deloitte in-house legal team).</p> <p><b>Monitoring and review of Policy</b> The Policy will be periodically reviewed by the WB Policy Owner. The Board will provide oversight of the Policy.</p>  <p>5</p>
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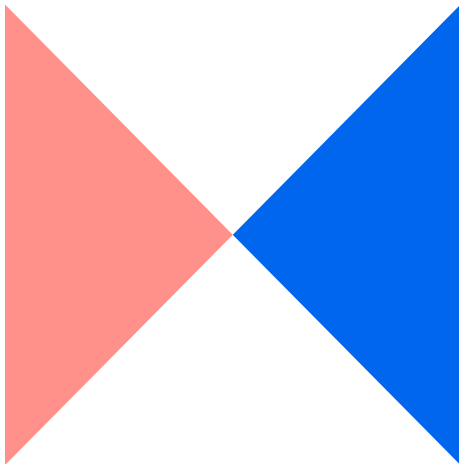




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# Policy Updates and Effective Policy Management Plans





# Policy Updates: How Often & Why?

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It Depends! On what??

Your risk profile!

When / if the law changes!

Consistency / Frequency of policy violations!

When / if your biz ops change!

Updates to your geographic footprint!

M&A / business activity!



# How Should Policy Updates Be Managed?

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# Policies on Policies





# A HOT MESS



# Polling Question #3

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**Q3:** Does your organization have a Policy on Policies?

- Yes
- No
- Don't know



# What IS the Difference?

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## Policies ...

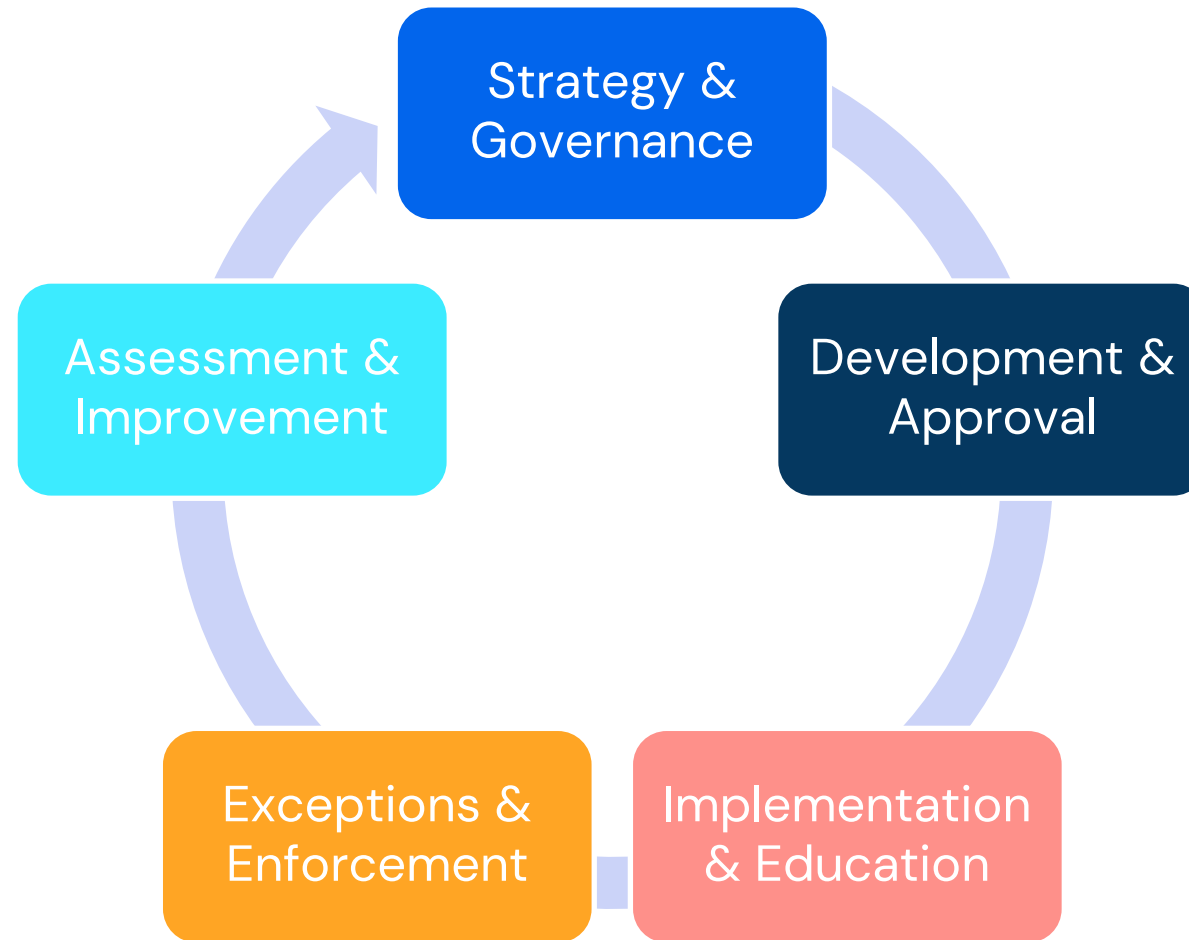
- Describe guiding principles
- Set the company's direction and tone and support its corporate values
- Should be universally applicable across all operations, all over the world
- Address legal, statutory, or ethical risk
- Help guide employee decision-making

## Procedures, on the other hand ...

- Provide additional guidance or information
- Help to further explain a policy
- Describe specific steps to accomplish an end result required by a policy
- Support the principles set forth in a related policy
- Should always be tied to at least one relevant policy

# Policy Management Framework

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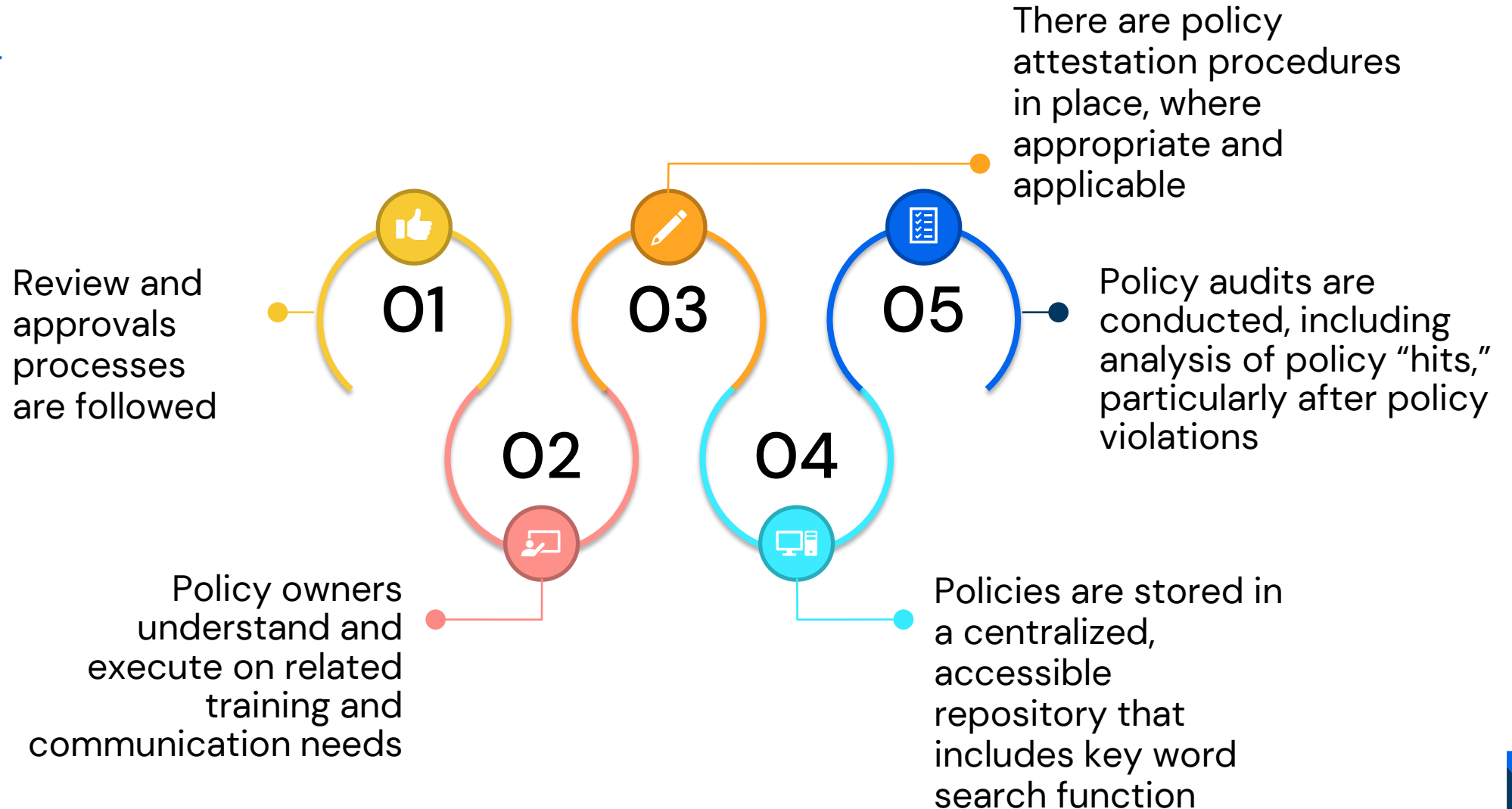
# (Some of) What We Look For





# More of What We Look For

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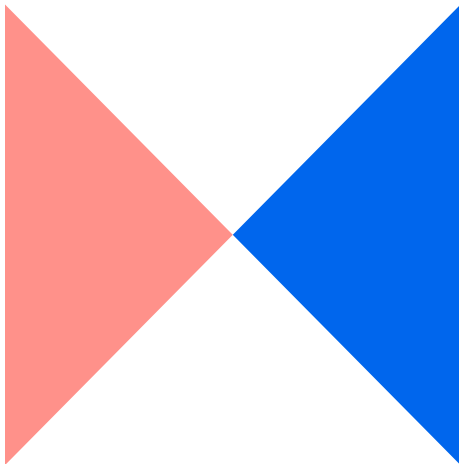


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# Policy Management Transformation at HSC and Ford





# Polling Question #4

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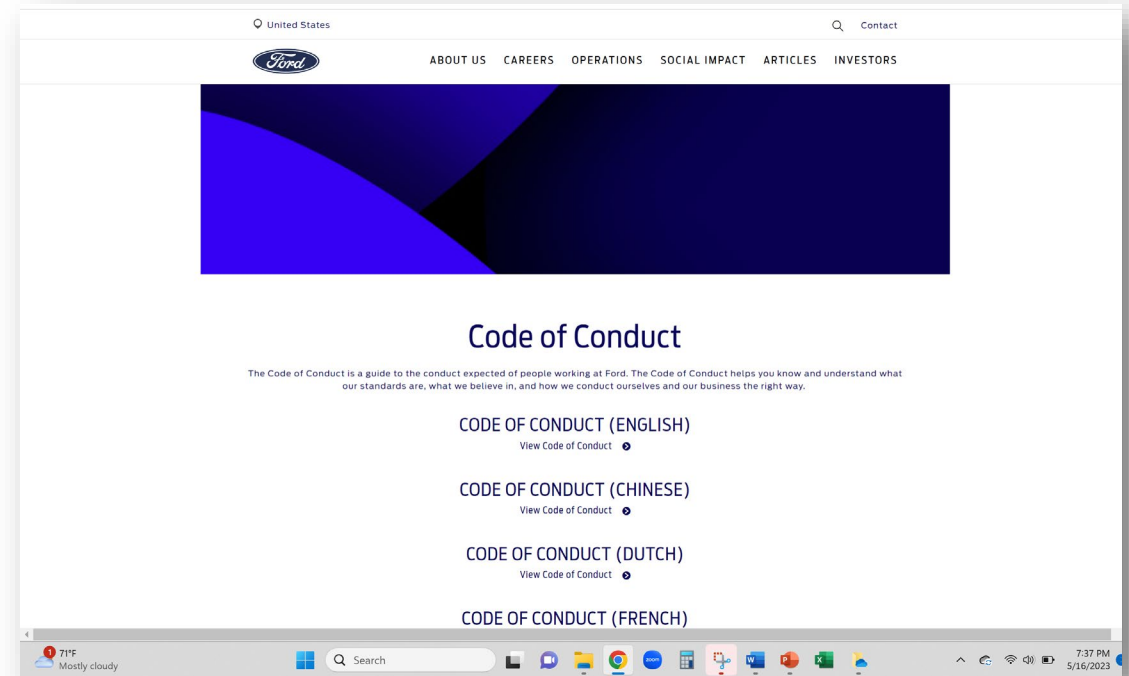
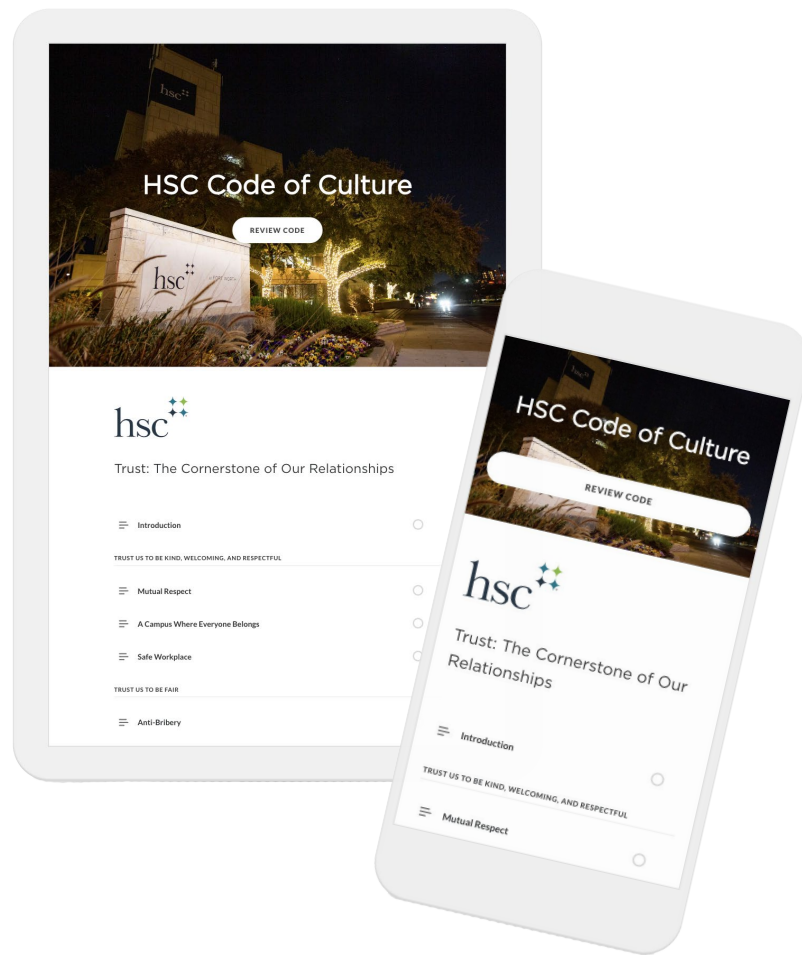
**Q4:** Policies at our organization are:

- In great shape!
- Not too bad
- To be honest, a mess....

# Project Origins



# Digital Code



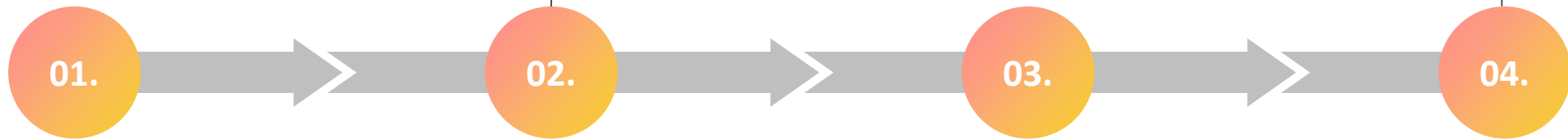
# Project Approach

- Assess policy on policies
- Agree on overall assessment criteria
- Analyze existing policy inventory against leading practices
- Review policies
- Identify structural gaps and enhancement opportunities

- Execute on policy transformation plan
- Coordinate with SMEs
- Edit policy on policies
- Draft / edit, or assist SMEs in drafting / editing policies as required
- Manage SME review and approval

## Review & Analysis

## Execution



## Project Planning

- Conduct kick off meeting
- Confirm scope and approach
- Identify stakeholders and SMEs
- Determine resource needs
- Agree on deliverables

## Reporting

- Provide remediation recommendations
- Conduct stakeholder workshop to socialize recommendations
- Prioritize remediation efforts
- Prepare policy transformation plan

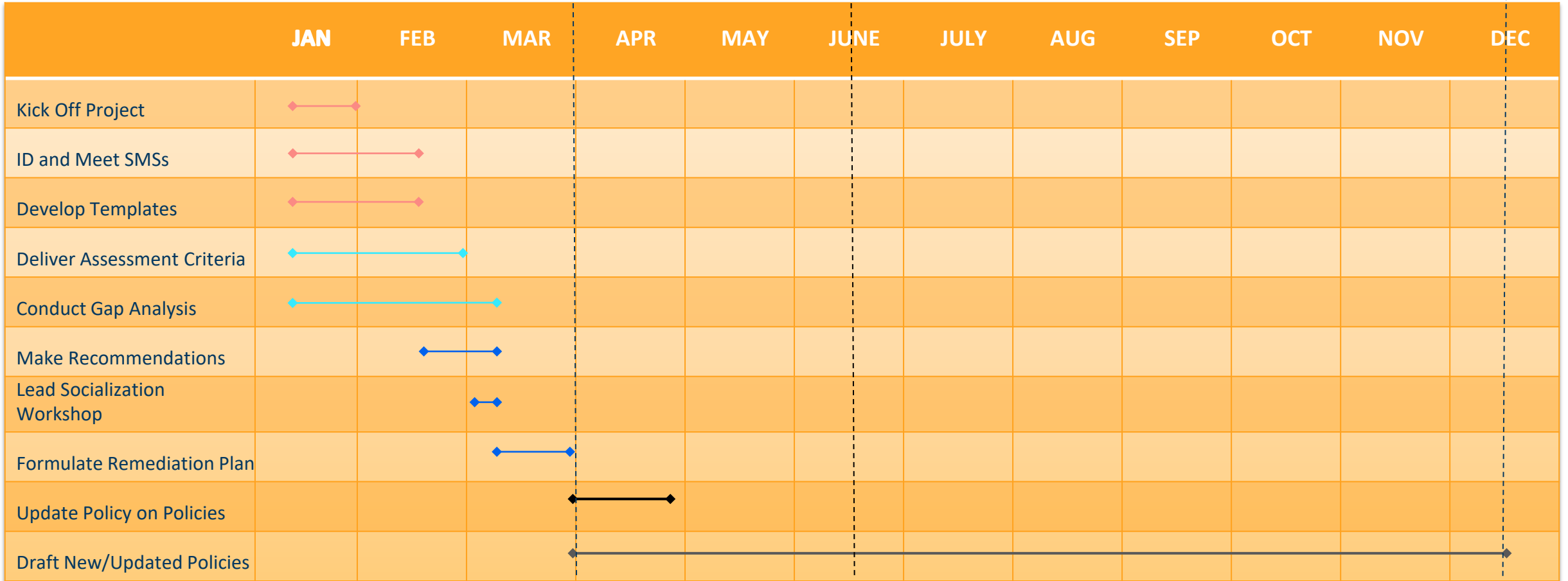


# Timeline

ANALYSIS & REMEDIATION  
PLAN COMPLETE

1/3 OF POLICIES  
COMPLETE

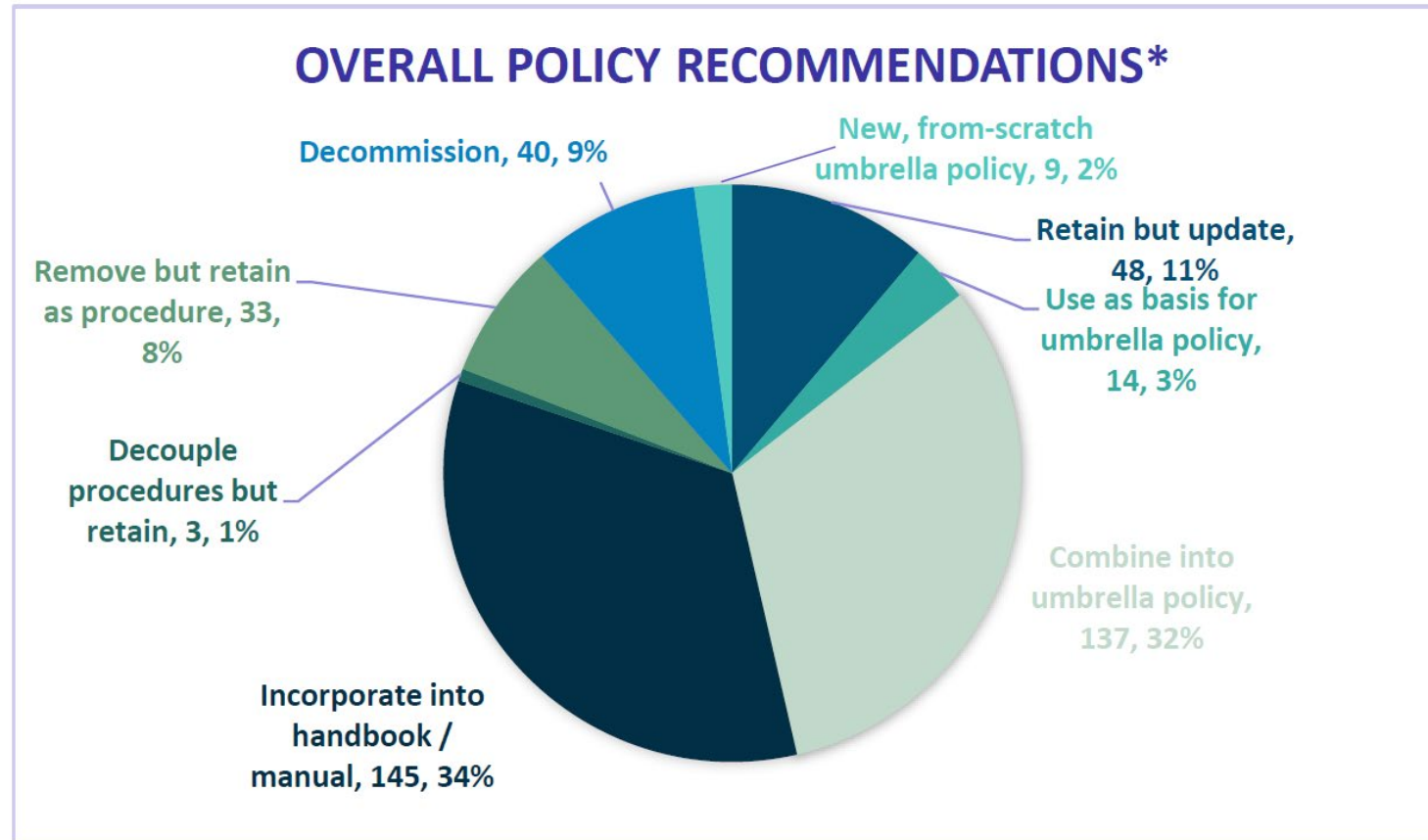
ALL POLICIES  
COMPLETE



- ◆ Project Planning
- ◆ Review & Analysis
- ◆ Reporting
- ◆ Execution



# The New World Order at HSC





# Stakeholder Management

- Eliminating policies will feel like you're eliminating their power
- Lightbulb moment: life will be easier with increased efficiencies





**“What are your  
expectations for  
accountability???”**



— Desiree Ramirez



Ok, Now What??





# Questions?