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COMPLIANCE WEEK

In Focus: 2015 Compliance Trends Survey

Welcome

Welcome to the 2015 Compliance Trends Survey report, a joint effort between Deloitte and Compliance Week, to gauge the scope and complexity of the modern corporate compliance function. Here, we've combined the deep knowledge and experience of Deloitte with the broad industry perspective of Compliance Week to answer a common question: how do compliance functions efficiently and effectively manage the risks associated with the increasing demands of numerous stakeholders and position themselves for success in the future? Or put more simply, what is the new normal?

For the last five years, Compliance Week has published an annual benchmarking survey, asking compliance officers how they work with their peers, what their responsibilities are, what resources they have and much more. This executive summary is the culmination of a much larger effort. We begin every winter, creating a survey to explore a wide range of issues confronting compliance organizations today. The 35 questions in the survey were grouped into four broad categories: the resources that compliance departments have; the responsibilities and activities with the compliance operations; the specific compliance risks within the extended organization; and the use of technology.

We then asked compliance executives across Corporate America (and overseas) to take the 2015 Compliance Trends Survey. The 364 responses we received—from around the world, across more than a dozen industries, and from organizations large and small—gave us the raw material to understand the common practices of many compliance functions today, and we're grateful for their input. We used the data to answer three questions in this report:

- Do compliance executives have the appropriate authority and resources to do their jobs?
- Are compliance executives assessing the right risks in the right way?
- How do compliance executives use technology to tame the challenges they face?

In these pages, you'll find an executive summary of the results on pages 5-7 and then "snapshots" of select findings from each of those three categories. We hope you find this information useful and that it can serve as a guidepost for your own efforts to understand the compliance strategies that might work well in your company.

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Executive summary

Corporate America is a huge and diverse range of organizations, each one structured in its own way. Yet after five years of collecting data and publishing this report, the prevailing direction for modern corporate compliance functions is clear: more authority and stronger organizational support for effective compliance programs— yet persistent concerns about information technology (IT) systems' ability to fulfill compliance program requirements in the modern corporation.

Authority and resources

We start with a chief compliance officer's (CCO) authority —that is, the ability to work with executives at the highest level of the organization. Out of 364 respondents, 57 percent now say their CCO reports directly to either the chief executive officer (CEO) or the board. This number has fluctuated over time (from as low as the mid-40s), but is now clearly marching upward. Fifty-one percent say the CCO has a seat on the executive management committee, and 59 percent say the CCO job is a stand-alone position. Fifty-five percent say they regularly brief the board on the company's overall ethics and culture.

Taken together, these statistics (and others to be presented shortly) suggest that most CCOs, especially those at larger corporations, now have an opportunity to participate in high-level discussions about corporate strategy, values, and culture.

Challenges remain in embedding compliance culture throughout the entire organization and its extended organization. Thirty-two percent of survey respondents said that compliance is seen as a business partner across their entire organization, essentially flat from last year's figures; 55 percent say that compliance is seen as a partner only "in some respects." So even if CCOs now feel like a part of the company's inner circle, results are mixed on whether that authority extends down through the entire organization, supporting the CCO as he or she tries to help build a strong, transparent, risk-intelligent organization.

For example, only 43 percent of respondents said their corporations have designated compliance officers in subsidiaries, business units, or geographic markets; 44 percent do not. And within that group who do, only 49 percent of those business-unit compliance officers report to the global CCO; 40 percent report to local senior managers. One question to contemplate as CCOs digest this report, then, is whether your entire compliance function has proper ability and authority to carry out its mission, regardless of the CCO's particular reporting relationship.

Risks, risk assessments, and responsibilities

To be effective, CCOs must generally assess their organization's compliance risks and manage core compliance systems to ensure the program works well. This year's survey results suggest a certain steady collection of responsibilities CCOs do and do not oversee.

The three most common responsibilities CCOs listed this year—compliance training, code of conduct, and the whistleblower hotline—are the same top three duties from last year's survey. Likewise, tasks such as records management, relationships with regulators, and even culture assessment all ranked near the bottom for both years (and in years prior as well).

Despite the role culture plays in creating an effective compliance program, culture assessment ranked dead last among the responsibilities CCOs have. That *can* be a troubling sign: If the CCO has a weak understanding of the company's true culture and workforce attitudes, it might jeopardize the effectiveness of more practical program elements such as compliance training or policy management.

Eighty-two percent of organizations now undertake some sort of enterprise-wide compliance risk assessment; nearly two-thirds said they conduct such an assessment at least annually, if not more often. That risk assessment gets done in a variety of ways: as a stand-alone exercise, in conjunction with internal audit's risk assessment, or as part of a larger assessment of all organization risks (respondents divided equally, one-third for each approach).

Third parties continue to be the single biggest worry for surveyed CCOs as they conduct their risk assessments, and they employ a range of tactics to manage third-party risks more effectively: 42 percent say they always audit compliance with policies or regulations; 38 percent always perform extensive background checks; 32 percent always require training or certification.

A stubborn minority of respondents still say they do not measure the effectiveness of their compliance programs: 30 percent in 2015, down from 37 percent when we began this survey in 2011. Virtually all organizations that do measure effectiveness look at a range of metrics, from hotline calls to internal audit findings to analysis of self-assessments. Again, these metrics were also among the most commonly used in prior years, suggesting a clear convergence in the approach CCOs use to understand how well their programs perform.

Howard Friedman, Deloitte & Touche LLP director and leader in the company's energy and resources risk and regulatory practice, thinks CCOs looking for budget increases need to find better, more objective effectiveness measures as a first step. "I'm seeing more compliance officers being asked to justify the business value of the compliance function," he says. "Boards and executive leadership often need more data to support budgets and resource allocations. The question that often comes up: how effective is the program today based on what we invested to date, and what's the return we might get on any further investment in the program?"

IT systems and strategies

One possible disconnect emerges when asking CCOs about the IT systems they use to fulfill their missions: Most are not terribly confident in their IT systems' ability to do the job. Only 32 percent of respondents were confident or very confident in their IT systems, down from 41 percent in 2014. What's more, most also say they primarily use desktop software or internally-developed tools for most compliance tasks, regardless of the size of the company or the organization.

The lack of confidence in IT systems may trace back to the relatively small size of compliance departments, which forces them to depend on other departments or business units in the organization to supply the data CCOs need. This data can come in a range of formats that the CCO must somehow cobble together into one repository for higher analysis. In essence, compliance functions are still spending a disproportionate amount of time collecting data, versus time spent adding strategic value to the business through analyzing and trending the data collected.

"While big data and GRC tools have great potential for the identification and management of ethics and compliance risks, many organizations are still waiting for the promise to be fulfilled," says Nicole Sandford, partner and enterprise compliance practice leader at Deloitte & Touche LLP. "Part of this is related to the continuing evolution of technology tools and analytics capabilities in general, which is happening every day. But many compliance executives have legal or audit backgrounds and may lack the knowledge required to really understand alternatives and make intelligent choices."

While this is an area where CCOs may need additional IT support and resources, or even the assistance of outsiders with a broad view of alternatives, the situation may not necessarily improve quickly. Only 26 percent of those reporting budget increases for the past year say the primary driver was new compliance tools, down from 39 percent in 2014.

Somewhat surprisingly, at smaller organizations (those with under $5 billion in annual revenues), the story about IT systems is different: compliance officers feel more confident in their IT systems as compared to peers at larger organizations. The divergence between large and small organizations suggests that the risks at smaller organizations are potentially managed in a more centralized way than those at larger organizations, reducing the reliance on sophisticated tools and technologies.

Conclusion

While the survey data shows a clear trend toward a more empowered CCO with a higher position in the organization, concerns and challenges related to subsidiary compliance organizations appear to persist. In addition, technology solutions continue to fall short of compliance needs. Perhaps with the stronger alignment of the CCO with executive management, the newfound authority may position CCOs to make progress in these areas in the coming year.

Do CCOs have enough authority?

44 percent of CCOs have primary responsibility for selecting subsidiary compliance officers in business units or geographic markets

21 percent of CCOs report to the general counsel

The U.S. Sentencing Guidelines (plus a host of other enforcement actions, consent decrees, and regulatory statements) clearly favor a strong, independent corporate compliance function. Many believe the role is most effective when the individual is a full-time, stand-alone CCO who reports directly to the board. The 2015 Compliance Trends Survey report suggests that more and more organizations are moving in that direction, although a considerable minority have not.

Fifty-nine percent of survey respondents said they now have standalone CCOs—an increase from 50 percent in 2014 and 37 percent in 2013, suggesting more organizations are deciding that the scale and scope of the role may require a full-time commitment. A similar number (57 percent) say the CCO reports to either the CEO or the board, the highest figure we've seen for this question in at least three years. Perhaps the most striking change is the number of organizations now providing the CCO with a say in high-level corporate decisions. Fully half of top compliance executives sit on their company's executive management committee, up from 37 percent last year.

Kelly Sauders, a partner at Deloitte & Touche LLP who leads its healthcare risk and regulatory practice, says the trend toward a more empowered compliance function may be driven by regulators and CCO candidates themselves. A crucial regulator in the healthcare industry (the Department of Health & Human Services' Office of the Inspector General) has clearly telegraphed its wishes for an independent CCO. "Compliance has been a core function in healthcare for nearly 20 years now, and a lot of the individuals who filled key roles early on are retiring," she says. "Searches are taking longer, and there's not always a large bench to draw from. Organizations are finding if they don't have the right authority and reporting structure, they cannot attract the type of candidate they are looking for. In several recent searches, we've seen CCO candidates negotiate for a better title and reporting relationship."

As much as the results suggest increasing support for a strong and empowered compliance officer, it is less clear that support is building for a strong compliance function across other parts of the organization. For example, only 43 percent of respondents said their organizations have designated compliance officers in subsidiary business units or geographic divisions; 44 percent said they did not. Within the 43 percent who do, less than half have that designated local compliance officer report to the CCO. (In our 2014 survey, only 39 percent of respondents said they had compliance officers in subsidiary units, and again the reporting lines were deeply divided: 44 percent to the organizations' CCO and 44 percent to a local business unit leader.)

"Any time you see a compliance officer reporting directly into business executives, that raises a red flag for me and can compromise the independence of compliance," says Tom Rollauer, director with Deloitte & Touche LLP and executive director of the Deloitte Center for Regulatory Strategies. "There could be some mitigating factors, and many times you'll see dual reporting" particularly at global organizations, he adds. "But there definitely needs to be a link to the CCO to preserve independence."

On practical matters such as budgets and staffing levels, we continue to see even large organizations maintain relatively small compliance teams (with the exception of financial services). As we have seen in previous years, roughly half of respondents say they have fewer than five employees devoted to compliance, and roughly 40 percent say their total budget is $1 million or less. And as one would expect, larger organizations (with $5 billion or more in annual revenue) have decidedly larger budgets and staff: 34 percent report budgets of $1 million to $10 million, while 54 percent of smaller organizations have budgets of $1 million or less.

Those small numbers alone may not be cause for concern— but they do indicate that CCOs must often work together with other parts of the organization (internal audit, legal, risk management, human resources (HR), and above all the local business units) to fulfill the compliance mission. And that cooperative approach can only succeed if the CCO is perceived as a strong and important part of the leadership team, participating in strategic discussions.

One industry further ahead than the others is financial services. Organizations in this industry are more likely to have larger budgets (8 percent citing a budget of $50 million or more, versus only 2 percent of all other industries) and larger staffs (17 percent with 100 to 500 people, versus 6 percent for all others). Financial services organizations are more likely to have a stand-alone CCO (73 percent) who is more likely to sit on the organization's executive committee (60 percent) and who is more likely to have subsidiary compliance officers who report directly to him or her (65 percent).
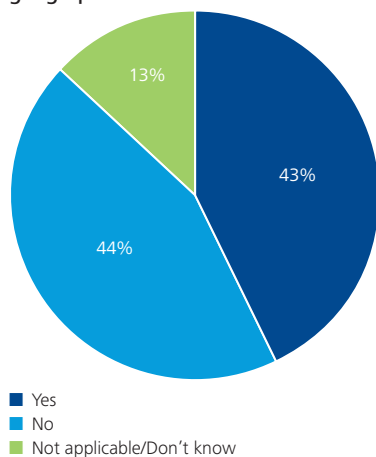
To little surprise, smaller organizations do have less robust compliance functions than larger ones. Comparing respondents with annual revenue less than $5 billion to those with more than $5 billion, smaller organizations are less likely to have a designated CCO (64 percent to 84 percent), that job is less likely to be a stand-alone position (51 percent to 70 percent), and budget support can be slim (9 percent of small respondents said they had no designated compliance budget at all). One potential bright spot: Smaller organizations are somewhat more likely than larger ones to expect compliance budgets to increase in the next year.

40 percent say compliance is considered when setting senior executives' compensation; 45 percent say it is not

24 percent say their organizations do not have a compliance committee

At your organization, the designated CCO is ...?

a stand-alone position separate from any other function	59%
also the general counsel	15%
also the chief risk officer	9%
also the chief audit executive	7%
other	13%
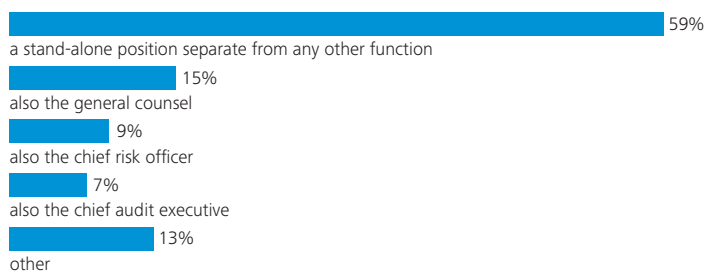
Total exceeds 100 percent because some respondents selected multiple answers.

Does your organization have designated compliance officers in its subsidiaries, business units, or geographies?

- Yes — 43%
- No — 44%
- Not applicable/Don't know — 13%

To whom does the designated CCO directly report?

- CEO — 36%
- Board or a board committee — 21%
- General counsel — 21%
- CRO — 5%
- CFO — 4%
- Other — 11%
- Not applicable/Don't know — 2%

Are CCOs addressing the right risks?
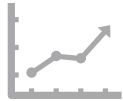
75 percent of large companies make some effort to measure the effectiveness of their compliance programs, compared to 53 percent of smaller companies

58 percent say they are "confident" or "very confident" they are looking at the right metrics to gauge effectiveness

The full range of compliance responsibilities of the centralized compliance function varies from company to company. Still, a few core responsibilities dominate, topping the results year after year. Respondents' most common responsibilities: compliance training (cited by 76 percent); code of conduct oversight (74 percent); whistleblower hotlines (70 percent); and regulatory and compliance investigations (68 percent).

What's more, the least common areas of responsibility for the 2015 report are quite similar to those of 2014: regulatory relationship management (cited by 40 percent), records management (36 percent), communications (35 percent), and culture assessments (24 percent). Still, these are not insignificant percentages, suggesting that most CCOs are busy with many different tasks. But the stable rankings year after year, at both the top and the bottom, also suggest that a consensus has emerged about what the CCO's most important jobs are.

This is the second year in a row that culture assessment has ranked at the bottom (24 percent). (In 2014 the number was 26 percent.) In these cases, CCOs should consider how someone else in the organization—such as the HR department—fulfills that role, since a keen understanding of corporate culture is crucial to developing effective compliance programs.

"Regulators are focused on organizational cultures contributing to recent ethics and compliance failures, but they haven't said what a strong compliance culture looks like. That's a challenge for all organizations," says Maureen Mohlenkamp, a principal with Deloitte LLP. "Rarely are roles defined that say 'compliance owns culture' or 'HR owns culture,' because everyone owns it—but in many organizations, nobody owns responsibility for assessing it." The two logical groups to assess culture are ethics & compliance and HR, she adds, but even then, they may not know how to do so in a way that creates actionable results.

Fifty-five percent of respondents said that the CCO provides "general reports on ethics and culture" to the board and CEO. Nevertheless, if organizations are not assessing culture sufficiently, that can jeopardize the CCO's other main priorities, such as compliance training education on the Code of Conduct and whistleblower retaliation.

More than 80 percent of respondents said they perform some type of enterprise-wide compliance risk assessment, and 64 percent said that assessment is performed at least annually, if not more frequently. How does that compliance risk assessment get done? Respondents split almost exactly three ways: one-third as a stand-alone process; one-third as part of internal audit's risk assessment; and one-third as part of a general enterprise risk assessment.

Martin Biegelman, director at Deloitte Financial Advisory Services LLP, encourages organizations to push that risk assessment beyond the compliance department. "As a general statement, it is a good thing that compliance departments work closely with internal audit in performing the risk assessment. It's also important to get adequate input from the business unit leadership," he says. "If you don't have buy-in and feedback from business leaders on the risk assessment process, it may be more challenging to address the risks that are identified."

Rollauer agrees. "For me, the risk assessment is at the center of the effort to manage compliance risk," he says. "If you have a robust enterprise-wide risk assessment process, your priorities will evolve out of that. CCOs should be setting compliance monitoring and testing priorities based upon these risk assessments. Organizations that have had these in place for a while are using them well; those who are just implementing may not be as advanced and may default to other priorities. In the end, though, the effectiveness of your compliance program is really based on the maturity and quality of the risk assessment process."

Third parties, and all the risks therein, continue to be the biggest thorn in the CCO's side. Respondents ranked third parties as the most challenging concern they face, and listed a bevy of measures they take to manage third-party risks: 42 percent say they always audit compliance with policies or regulations; 38 percent always perform extensive background checks; 32 percent always require training or certification. (Include respondents who answered "sometimes," and all those numbers top 70 percent.)

Which area(s) is the compliance function responsible for in your organization?

Top five answers

Compliance training	76%
Code of conduct	74%
Complaints and whistleblower hotlines	70%
Regulatory and internal compliance investigations	68%
Conflicts of interests	65%

Bottom five answers

Regulatory relationship management	40%
Anti-money laundering programs	40%
Records and information management	36%
Communications	35%
Culture assessment	24%
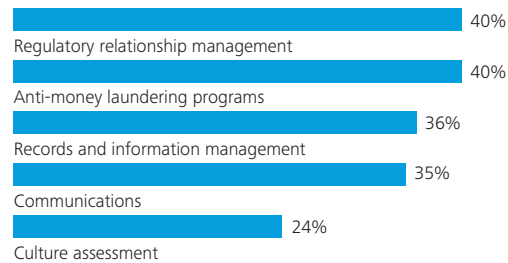
Total exceeds 100 percent because some respondents selected multiple answers

Which are the three most challenging aspects of your organization's program for managing compliance risks?
(Please select your top three in order of priority, where 1 is the most challenging.)

	Most challenging	Second most challenging	Third most challenging
Third-party compliance risk management	20%	9%	8%
Executing compliance risk assessment process	14%	14%	12%
Monitoring compliance with policies	14%	15%	12%
Data analytics and reporting	11%	11%	13%
Regulatory relationship management	8%	7%	5%
Policy/procedure management	7%	10%	11%
Conducting internal compliance audits/reviews	7%	10%	11%
Compliance trainings	5%	8%	13%
Management of internal investigations	5%	5%	5%
Talent management and retention	4%	7%	4%

■ Most challenging ■ Second most challenging ■ Third most challenging

9 percent never perform a compliance risk assessment

The most commonly outsourced element of a compliance program is the whistleblower hotline (39 percent); 24 percent say they do not outsource any part of the compliance program

Do CCOs have effective IT systems in place?

Fully 58 percent of CCOs say they are confident or very confident that the metrics they use to gauge the effectiveness of their compliance program give them a strong sense of how things are going. Then there is this: 59 percent are only somewhat confident, or not confident at all, that the IT systems the compliance department uses can fulfill the CCO's reporting and responsibilities tasks.

That gap—between the confidence CCOs have in their metrics for effectiveness, but lack of confidence they have in the IT systems that gather the data they measure—suggests a possible disconnect between CCOs and IT strategy. Where does that come from? What's behind the lack of confidence in IT?

One factor may be that compliance functions require increasing amounts of data to do their jobs well, and they have trouble getting it. One longstanding frustration, says Timothy Cercelle, a director with Deloitte & Touche LLP who is a leader in the governance and risk practice for the insurance sector, is that compliance generally doesn't own any of the data it needs. That means the first task is often negotiating for, gathering, and reconciling data from disparate systems across the organization.

"We're hearing more and more chatter about how to use Big Data to manage risk. People are struggling with this. Until budgets ramp up, that's likely to remain the case. Having said that, there can be no substitute for good people who are empowered and resourced to do the hard work in the compliance function."

— Keith Darcy,
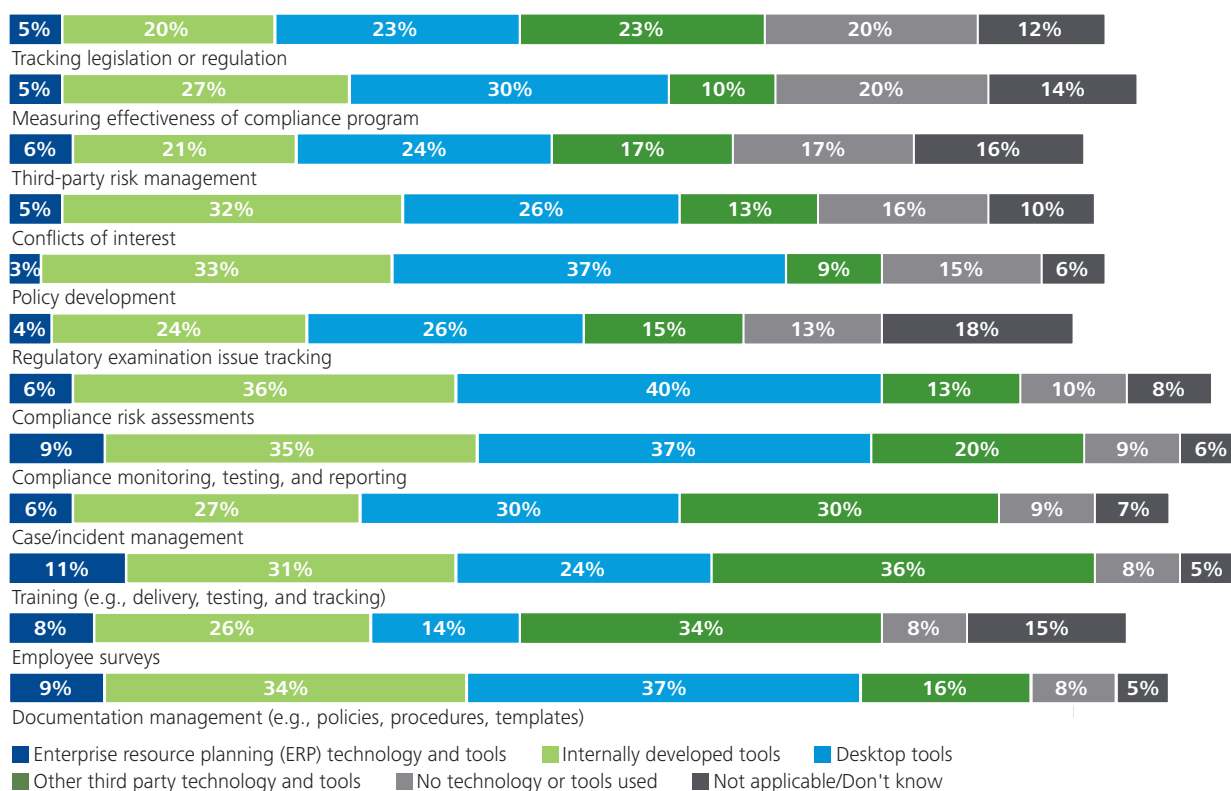Independent senior advisor to Deloitte & Touche LLP

Survey respondents listed desktop software and internally-developed tools as their most common IT systems for a wide range of tasks, including core responsibilities such as compliance monitoring and reporting, or measuring the effectiveness of the compliance department. Specialty software from GRC software vendors were generally rare, except for the tasks of case management (used by 30 percent), training (36 percent), and employee surveys (34 percent). For almost all other compliance duties, use of GRC tools hovers around 15 percent.

In many cases, CCOs may be frustrated with IT because the tools they want simply aren't available yet commercially. For example, Cercelle says, many CCOs are keenly interested in advanced predictive analytics that can aid in predicting future risks before they erupt into a catastrophe, or to assist with regulatory change management. Few tools now can perform those functions without a major customization effort. Many GRC software tools, he says, "fit the bill for risk assessment and control monitoring, but they won't take compliance to the next level with predictive analytics."

For many CCOs, extracting value from IT systems might have to happen without additional technology budgets: only 26 percent of those reporting budget increases for the past year say the primary driver was new compliance tools, down from 39 percent in 2014. Instead, moving forward means "building better relationships with the chief information officers, and understanding what tools are already available within the walls of the company that could help with compliance efforts," Cercelle says. For example, he says, many organizations bought GRC systems for Sarbanes-Oxley testing or data security purposes and could leverage additional value from those investments by extending them to cover more compliance functionality.

Somewhat surprisingly, more compliance executives at smaller organizations (those with under $5 billion in annual revenues) expressed confidence in their IT systems than those at larger organizations. While this confidence seems counterintuitive given the leaner resources at smaller organizations, one possible explanation is that their business models and associated risks are easier to manage manually or centrally than those of larger operations.

Please indicate which tools and technologies are used to support each component of your organization's compliance program.

5%	20%	23%	23%	20%	12%

Tracking legislation or regulation

5%	27%	30%	10%	20%	14%

Measuring effectiveness of compliance program

6%	21%	24%	17%	17%	16%

Third-party risk management

5%	32%	26%	13%	16%	10%

Conflicts of interest

3%	33%	37%	9%	15%	6%

Policy development

4%	24%	26%	15%	13%	18%

Regulatory examination issue tracking

6%	36%	40%	13%	10%	8%

Compliance risk assessments

9%	35%	37%	20%	9%	6%

Compliance monitoring, testing, and reporting

6%	27%	30%	30%	9%	7%

Case/incident management

11%	31%	24%	36%	8%	5%

Training (e.g., delivery, testing, and tracking)

8%	26%	14%	34%	8%	15%

Employee surveys

9%	34%	37%	16%	8%	5%

Documentation management (e.g., policies, procedures, templates)

■ Enterprise resource planning (ERP) technology and tools ■ Internally developed tools ■ Desktop tools
■ Other third party technology and tools ■ No technology or tools used ■ Not applicable/Don't know

How confident are you in the ability of your compliance department's IT systems to fulfill your organization's compliance responsibilities and reporting requirements?

1%
6%
26%
38%
21%
8%

■ Very confident
■ Confident
■ Somewhat confident
■ Not confident
■ Not applicable/Don't know
■ Not answered
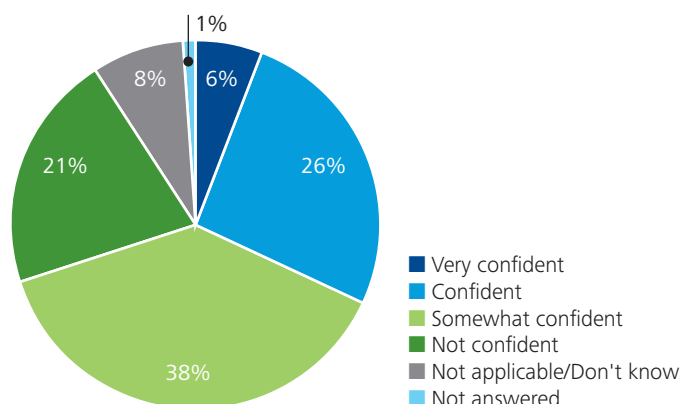
Methodology

The 2015 Compliance Trends Survey was drafted by senior Compliance Week editors and Deloitte in November 2014, and then pushed out to an audience of senior-level corporate compliance, audit, risk, and ethics officers worldwide from December 2014 through mid-March 2015.

The survey produced 370 responses. Any submission where the respondent's title was not directly related to corporate activities ("partner" or "administrative assistant," for example) was excluded from the data analysis. The result was 364 qualified responses from senior-level executives, working in ethics, compliance, audit, risk management, or corporate governance. Of those 364 respondents, 26 percent held the title of CCO, chief ethics officer, or chief ethics and compliance officer; 13 percent held some other C-level title (chief risk officer, chief audit executive, general counsel, chief governance officer); 18 percent held a variety of titles at the vice president level; 13 percent were compliance managers or the equivalent; and the rest held a range of other titles (director of business conduct, director of anti-corruption audit, deputy compliance officer, business unit compliance officer, and the like).

The survey also went to a wide range of industries. Of the 364 qualified responses, the single largest industry group represented was financial services at 29 percent. Next were healthcare and consumer & industrial products, both at 15 percent; technology, media, and telecommunications at 8 percent; energy and life sciences both at 5 percent; and a range of other industries trailing behind.

Respondents were asked to disclose annual revenue and workforce size within certain ranges. Median annual revenue was in the $1 billion to $5 billion range, median workforce size in the 5,000 to 10,000 range.

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About the Deloitte Enterprise Compliance Services (ECS) practice

The ECS professionals within Deloitte & Touche LLP work closely with chief compliance and ethics officers to assess, design, and implement effective and efficient enterprise-wide compliance programs. Cutting across multiple business units, these programs are built from the top down and help organizations use their people, processes, and information technology to address the rapidly changing compliance landscape. The managed regulatory compliance practice within ECS executes critical regulatory compliance activities on behalf of our clients, extending the company's resources and offering a cost effective alternative to traditional, in-house compliance models.

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About Compliance Week

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