

Social media savvy— Think before you tweet!

an interview with Anne Van Dusen

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Corporate social responsibility and compliance programs

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I just read another article stating that compliance officers should also be responsible for corporate social responsibility (CSR).

Corporate efforts to be in compliance have failed in the past because no one was responsible for compliance with the rule of



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law. People were distracted. People would work on anything other than compliance because compliance is hard. So people who had multiple responsibilities would put compliance last on their list of things to do. That is why the Compliance profession was created—to have one person whose only role was to prevent, find, and fix

ethical and regulatory problems. So it would be counterproductive if we now became as distracted as those who came before us, by adding responsibility for CSR to our role.

CSR is an important cause. It is noble. CSR is a beautiful thing that every company should strive for. However, the compliance officer has to help ensure that every employee is responsible for compliance and follows the rule of every law—thousands of laws, complicated laws, and occasionally-vague laws. There are some laws related to CSR and the compliance officer should certainly focus on those. However, much of CSR is unrelated to the rule of law.

Another reason to not have compliance responsible for CSR is that the compliance officer's role must be unbiased. The Communications and Public Relations departments are heavily involved in CSR. What is the biggest concern Communications and Public Relations have? They want to improve and protect the company's reputation. They want good news and they have to combat bad news. When the company needs to be defended, they are among the first departments to be called. That is OK. It is their job. It is a good and important job. But it is, by definition, biased.

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Compliance professionals must be unconflicted. We need to stay at arm's length from those in charge of defending the company. When a problem is discovered, our role is to gather all of the information—good and bad. We may get independent, outside advice about what to do. We then take that information to leadership with a suggestion about what to do. We help leadership make better decisions. We can't do this if we are knee-deep in the CSR efforts of the organization or if we are also responsible for defending the company's reputation.

CSR and compliance should work together, but remain functionally separate. 🗣️