

Steps to Change Podcast: Tim Graveney

Allen

Hello and welcome to this episode of Steps to Change, the podcast where we explore learning and development topics, organizational behavior change, and practical ways to inspire people to act differently and to support organizations with strategies for addressing their challenges. On this episode, we're discussing the question, how do ethics and compliance play their part in creating organizational culture? And how can organizations establish a shared vision for what good looks like when it comes to ethics and culture in their day-to-day interactions. Our guest on this episode is Tim Graveney, the Ethics and Compliance Officer and Freedom to Speak Up Guardian at HCA UK. Welcome, Tim. How are you?

Tim Graveney

Hello Allen, thank you very much indeed, it's lovely to be here, thank you for the invitation. Yeah I'm doing okay, thank you very much indeed.

Allen

So, Tim, for the listeners out there, tell us a little bit about yourself, your background in the ethics and compliance space, and anything else you think is worth knowing before we dive into the conversation.

Tim Graveney

Well, I started out at university doing law and politics and imagining that I would have a career either as a barrister or as a diplomat or as an MP even at one stage. I started out at Deloitte. I accepted a paralegals job at Deloitte because I had nothing really else to do at that time. And 17 years later, having found steps along the way and a wife, I decided that ethics and compliance was where it's at for me, fell into the career a little bit.

I had a break for a year and a half after Deloitte where I was a house husband and dealt with ethics and compliance in another way, and then found my way to healthcare. And so, I'm working now as the Ethics and Compliance Officer at HCA Healthcare in the UK, which is a UK division of an American company.

And in that role, I've got responsibility for the Speaking Up programme, which is the exciting part of ethics, but also the anti-bribery and other regulatory compliance that we have across our business, as a private healthcare operator, we need to be very transparent. That's the key for us with prospective patients. And so that's how I became excited by compliance about 20 years ago and haven't really lost the buzz.

Allen

Thanks for that background, Tim. And I really love to hear that sort of organic development of your career into this space, right? Because one of the things we are going to talk about as we go into the

topic now is that ethics and compliance can be seen as like the scary, no fun police part of the business, right? And that's one of the things I want to unpack with you. So, for you to fall in love with it is really great. So, I'm excited for you to share that passion you have for it and why it's useful in helping create a shared vision and culture and the challenges it can face in businesses.

So, yeah, Tim, let's get into it. you know, as I was saying, that idea of ethics and compliance can seem like the kind of, you know, finger pointing or you're gonna get in trouble aspect of a business. Is that the case for it, or is it just getting a bad rap? And why should people really care about ethics and compliance in a business?

Tim Graveney

Well, I think to describe it as the no fun police or scary or whatever words you've just used there, which are very common, does it a disservice. And of course, would say really ethics and compliance, although I would like to discuss what those terms are, but taken generally in the vernacular, so to speak, I think they're about having fun, but in the right way.

Allen

Mmm.

Tim Graveney

If fun is what we're in it for, it's about sort of setting the rules and understanding, you know, what to do when we get to the edges of those rules. That doesn't seem to me to be a no fun engagement at all. And certainly, over now 25 years working in this space, one sees ebbs and flows and tides, and it's exciting and keeps you on your toes as you respond to those in a way that really drives the business forward and to the latter part of your question, I think a company that does things the right way, that is true to its values, in particular that quite nefarious concept sometimes of integrity, is likely to be one which attracts people like you and me, Allen, and then our kids and the people that we can influence and in that way is a little bit more secure for the generations. So, I really think it's absolutely fundamental to doing good business.

Allen

Mm-hmm, absolutely. And I was being a bit of a devil's advocate at the start there with the way I positioned that question. Because I think in the work we do and work we've definitely partnered with you on Tim, when you start doing the research around what is your viewpoint on ethics and compliance with the general population, sometimes that can be some of the sentiment people have towards it.

But what I really like about how you positioned it there is, it's really about establishing those rules of engagement, those shared that structure that allows us to understand how we need to operate as good citizens within the organization so that actually you know that you're operating in a way that's compliant, but also aligned ethically and living the values of the organization. So, it's really about giving that shared reference point that everybody understands the role that they can play.

Tim Graveney

I would certainly agree with that. I think actually that's quite a neat way for me to make a quite a key point, which is that ethics and compliance mean to me all things to all people. So, there are the obvious challenges, you know, I would imagine that many of the people listening to this podcast will be in roles similar to mine.

And so, it's very easy sometimes to hear the negative tone about ethics and compliance and you may find me rather boring by the end of the episode because I think you may, if you ask the right questions anyway, you'll find that I'm very excited by it and want to talk in different terminology and often reverse the polarity of the question, so to speak. But I think it is important to note that ethics and compliance are not the same thing. And I think that they're all things to all people, which, okay, it does mean that you're on the hook sometimes if your organization is in the press for a bad reason.

People will look at you as the Ethics and Compliance Officer and think, well, that must have been something to do with you. But actually, as time goes by, I find this increasingly easy to do. You are also allowed to tailgate the great stuff that your organization does. So, in mine right now, the environmental compliance, for example, and sustainability goals.

And when I think about ethics and compliance and taking those two terms generally, I feel it's all about the reliability of your organization. Are they reliably true to the mission statement and the values and the goals that you espouse, no doubt in your codes of conduct and in your other policies? And if your organization is reliably compliant or has reliable ethics, then I really think that you're onto something extremely positive.

Allen

So, one thing I want to kind of touch on as we start to drill this down into, you know, how can organizations create a shared understanding of the ethics, and the values, and the compliance requirements within an organization. You've mentioned you, you know, you've been in this space for over 20 years and things change, right? These aren't things, aren't set in stone. People's values change generationally or there's different viewpoints across different regions of the globe.

So, I guess trying to come up with my question on the fly here, how do you manage shifting viewpoints in a role that is trying to establish good citizenship behavior, if you will, and people maybe come at you and go, well, I don't view it that way. These things change, and I have a different viewpoint. I don't align with that.

Tim Graveney

To be slightly Pollyanna-esque about the start to that response when you say people's values. Do people's values really change, Allen? I'm not so sure that they really do. And certainly, organizations are very, very far away from accepting anything other than rules-based, policies-based approach.

I don't think that people's values are changing. And so, I think my first response is to remind people that what is good, and right is good and right. And you know perfectly well what they are.

There are some challenges at this very moment, of course, as we know on a macro scale. But again, to the audience members here, I would say, well, let's shut that out, shut out the outside. Ok, be aware of it. But you will actually, there are many people, you know, in my, in my circle, including me who, though lovers of, you know, podcasts like this, Allen, but, but about politics in the UK and in the US want to shut it out. We almost want to shut it out right now. So, whether or not you can do that with your podcasts, I would encourage you to sort of shut it out at work and just remind yourselves that, that, that what is good is good.

And acting with is a bit CS Lewis about the definition of integrity here, which means all things to all people again. But if it is about doing the right thing when no one's watching, then you know perfectly well that that is today what it was 10 years ago. And it will be, by the way, in 10 years what it is today as well. That is hard to do to shut out the outside. I know. And I'm working in an organization which is across continents and has an American influence, for example. It can be tough.

But how do you internalize it? Well, I think if truth matters to you and transparency, as I've already said about my company's philosophy of transparency and truth, means something to you, be honest. And by the way, if truth and transparency don't mean something to you, then why are you even listening to this podcast? Why are you working in ethics and compliance? Why are you interested by ethics and compliance? Go find something else to do. Become a podcaster, Allen.

Allen

Fair. Well said, Tim. Absolutely well said. Yeah, I love that.

So, let's now move into this idea of how you actually create that shared value and viewpoint in organizations, right? So as an organization, you will have come up with your values, your ethics, your rules of engagement. So how do you actually make that live and get a collective shared viewpoint on what that is for people in the business and your experience, Tim?

Tim Graveney

So, I think for a start, I would challenge people even with this very basic thought. When we talk in questions like that about having shared values, values that across the company that everyone is aware of, are they? Are they really aware of what your values are? I can articulate my firm's mission statement and I know my firm's values because I'm responsible for nurturing them and very proud I am to do that.

Firstly, does everybody know those values and know what the code of conduct states? But then secondly, what does it actually mean to you? And I think that second thing is very important for all of us. What does it actually mean to you to work in an organization that acts with integrity and acts in an ethical way always?

Each individual should in a healthy organisation be allowed a modicum of a grey area, know, so long as they know how to police that themselves. So, I don't think you're looking for a one size fits all

approach when it comes to ethics and compliance. And I think even if you tried that, you know, people would, you know, there would be a bunch of people in the room who would throw the three examples of where it didn't go right, rather than the three who would hear you and say, yes, that endorses my view. So how do you get a best fit? That allows everybody the freedom to be who they are whilst not compromising the direction of travel for the company. Well, you need to be aware of the resources at your disposal. And if you're privileged enough as I am to be in a role where you can sort of set the direction of travel, then you've got to be in the right committees. You've got to be in charge of the right things. You've got to know when to play second fiddle too.

You need your leaders on board, absolutely, but you need to be taking every opportunity you can, I think, to publicise what you're doing as the ethics and compliance representative, not only to articulate what the rules are, but to help people understand why the rules are the rules that they are.

But now our strapline is enabled, transparent and true. And so that means that our people are enabled by good policy, for example, or by talking with me to understand what the rules are. That what we disclose is transparent, so that we don't hide information on websites, for example, but that we're very clear about what it is that we publish and then true, which should stand self-evidently, but I don't think does quite right at the moment, but what is true is true. If I disclose that we paid a doctor £100 for something, but we in fact paid him or her £1,000, that is wrong, and it is not right.

And there is no circumstance in which that is right. Keystroke error, perhaps, but on the example, I've given, but we know what we have done, and we must disclose it, I think, truthfully. So, keep it pretty simple. Use every opportunity you have to set training agendas as well. Go and meet the people. Find, if you can, we're going to talk about speaking up champions, I think. I've got a network of speaking up champions that help me with that particular role. But yeah, just see who you can influence and then influence them with kindness I suggest is quite key because people do like kindness from their ethics and compliance officers.

Allen

And you know the training aspect just want to pick up on that because I do want to dovetail this into speak up in just a moment. But one of the things around obviously that you're aware of Tim and the listeners will be aware of is at Steps were really curious about the behaviors of these things right so we can write all this stuff out and we can say this is what this means there's our three three words.

But then what's a really interesting aspect of training that we have leaned into our experience with Deloitte and probably in future programming potentially is, you know, when you go, okay, these are the ways we behave. But then when you wrap that up into everyday situations, right, of, I'm in this type of meeting and somebody is saying this, or I'm now at a, 'm now out with a client and they're behaving in a way that isn't aligned with our values. What do I do?

And you ask people in a room, how would you show up in this space? You're gonna get as many different opinions as there are people in the room. And I think that's a really fascinating aspect that that training part that needs to come in because we're all human beings and nobody's perfect, but we need to give people an opportunity to explore these challenges before they get into them so they

can prepare themselves to behave in a way that's going to be, you know, more in line with what the expectations are.

Tim Graveney

Yeah, yeah, I would certainly agree with that. I love the way that Steps in particular, I know other companies are available, but I love the way Steps uses drama. And it was a privilege to work with you all many years ago at Deloitte and it is the same with HCA as well.

So, what is great about the Steps programme actually is that we're in the privileged position of actually just watching and we can all talk a bit about it afterwards. So, I love working with steps and in particular that very unique way in which you create learning around this space, which as you correctly identify unquestionably has given me, but also the people that I'm privileged to influence in some way, the opportunity to prepare in advance, Allen, as you rightly say, for situations that can be very difficult indeed.

Allen

So, I'd love to hear your thoughts on why speak up culture is important for supporting compliance and ethics and keep bringing that positive spin Tim because I think that's a really wonderful aspect to really encourage people this is a good thing, right?

Tim Graveney

So, it is a good thing. Speaking up, you know, I don't quite know what it looks like when it's done badly, to be fair, but I'm going to say at least when it's done well and actively, is something that will not only improve the situation for the person who's spoken up but will bring the listener a great deal of happiness as well. And in that way I think absolutely reinforces the thread through the organisation that speaking up matters because they tell their peers and their colleagues and in that way we can work with HR by the way, hand in glove with HR, we can work to make the situation better for other people as well.

Allen

Mm-hmm. Yeah, I love that. Once you're aware that there's an issue, then the positive aspect is that we can work together to try and solve this, right? And smooth things over or rebuild that trust or whatever it is that you're trying to solve for. But I guess I'm just curious around, for example, we've worked quite a lot in the finance space. And you know, there have been challenges in organizations in the finance space where someone might be managing a trade in a way that isn't fully compliant from a regulatory perspective, but also from a values perspective within the organization. But then people know, but they don't say anything because they go, well, you know, it is what it is. And that's just kind of how it works.

So, I'm curious, Tim, in your view on what might keep people from speaking up when they can absolutely see that something's not right? And is there any tips beyond what you've already shared for someone in your role or within an organization to kind of help address that? Because by not speaking up, it can have really big impacts. It can have huge financial impacts. It can have societal impacts in the way that you are viewed, right, damaging news, news in the press etc. Yeah, I'll throw that that question over to you just to get your thoughts on it.

Tim Graveney

Again, it's the example you gave there of somebody not listing a deal in the right way. The detail doesn't matter. It is a really interesting example, Allen, and you've, I think, deliberately pitched it at the sort of higher pitch. So, to higher register, that's tough. That's a really tough situation for me or anybody to deal with, to be honest. So, my first, well, I'm going to use this word maybe only a couple of times, but the first barrier to speaking up, I think, can be the seriousness of the the incidents.

And actually, you know, when I when I list in my mind the barriers that I now go on to identify seriousness isn't necessarily one of them, but you're right that it should be. The more typical barriers to speaking up include the fact that, you know, the expectation that no one will listen, I've partly addressed. Another is that I will suffer detriment for speaking up, and it's a word that people will be very familiar to a number of people.

That my career in some way will be sabotaged by speaking up, my existence of the company even, existentially might be a threat if I do this. Another is that I often hear, which people might sense some frustration about, is somebody else has spoken up about this but nothing happened, to which the answer is almost always, well, either they didn't speak up actually, despite what they told you, or else certainly, you know, they didn't speak to me, you know.

So, I can help. I know I can still help. So those are some of the key barriers to speaking up. But I am going to launch into this now because the answer to that is, as I've said to the National Guardian's office as well, and perhaps some people have heard me speak about this, but for me, I think it's much easier and certainly much more productive for everybody, in the organization to invert that question again.

And actually, I look at those same barriers to speaking up as portals for speaking up. And I'm not an astrophysicist, as is very clear from my CV, which I articulated earlier on. Not an astrophysicist, guys. So, apologies for using that word colloquially. But what I mean by that is simply that if, let's say, the chief exec doesn't listen, is identified typically as a barrier to speaking up in your organisation.

If you can prove that the chief exec listens, if you can prove that the chief exec listens and is interested and takes some action, well, you know, that all of a sudden acts as a portal, you know, a gateway to further success for your programme in the organization. And I can say the same thing as well about all of those other barriers to speaking up as well. In particular, the one about taking no action. Nothing will happen as a result of this. And, you know, people like me wrestle all the time with confidentiality. I say we wrestle with it. We love confidentiality. It's very, very important. It's very, very important that we protect it.

But identification of situations in the telling of stories, which you and I both love and have loved together for many years. If the telling of stories somehow identifies somebody who hasn't given consent to, you know, for their story to be told, then that obviously is something that you must not risk at all. So, a fun challenge again, but a challenge nonetheless is to celebrate in a different way or in a very careful way, those situations where speaking up has really resulted in a change.

And if you get that right, again, for example, in your annual training, for example, in dramas or in the discussion points after dramas that that Steps has helped you to convey to your people, my goodness me, then then you've got people coming out of the room saying, hang on a minute, I didn't realize that I had had that impact. Or that's very exciting, because that's the sort of impact we need around here.

And so, it's a self-fulfilling, a virtuous circle if you like, it's self-fulfilling at every stage that you improve things along the way. So, I would, as my number one takeaway, speak positively about speaking up.

Allen

I love that. And I'm sure the astrophysicist community won't mind the analogy of the portal. They'll allow it, think, because that very clearly illustrates the point. I want to I don't know if this is a reach too far, but part of that portal aspect that you talk about where people can go, is that connected to the Speak Up Guardian concept? Because I'm just curious for our listeners, tell us a little bit more about that and how you create those Speak Up Guardians, or champions, or what they may be. And so maybe they can take that away to their organizations.

Tim Graveney

Yeah, absolutely. Well, those of you who are privileged to work in healthcare may know about the National Guardian's office, indeed across other sectors as well. So, we borrow much of what we do from the National Guardian's office. And that's your first link if you're curious about this question.

But the Speaking Up Champions, well, can't, yeah, we've got an organization here of about, I've got about 7,500 people at the latest count to look after and I'm doing compliance as well. So, this is part of my ethics role. So, I've only got a small part of my time available, or a limited part of my time. It's not small, but it is limited by other things available for ethics. And so, I need help ultimately, Allen, that's the first thing. And in my organization, we run a number of hospitals and so that we across a number of locations, each by the way, with their own culture, each team even with its own culture, a topic for a different guest. Though I'm privileged to know several who've achieved wonders in that situation.

But I need help. so, we started, we launched this Speaking Up Champions programme here on March 23rd, 2020.

It's grown since then. So, we now have very nearly 50 speaking up champions across our organization. We aim to have one in one for every 150 members of staff, which will answer a question that I know a number of people will be thinking in passing. And they receive, as I said earlier on, actually, they receive a little bit of acting training from me and, and my support always. And we together celebrate that HCA makes me available for them whenever they need me, but also gives them an opportunity to lead themselves.

They're often, of course, they're often more junior members of staff, partly because it is perceived that senior members of staff won't listen. But we give them leadership responsibilities with this role as well. And so, we meet regularly to share very carefully some of the successes, as I've indicated before, and really it's just a great privilege to know these people firstly, of course, as Speaking Up

Champions, but then, you know, then as they move on and do other things with their careers, sometimes here, sometimes in other organisations, you're lucky enough to stay in touch with them. And you find that very soon they become your friends and, you know, can help you in all those other things in life, as well. So, it's a community of kind people trying to do their best. And that is very helpful right now in reinforcing some of the, you know, some of these very positive messages that we are very much trying to embed in this organisation wherever we can beyond.

Allen

Brilliant. And Tim, any last words of wisdom before we finish out the episode?

Tim Graveney

I don't think you've had a first word of wisdom yet, have you? I think that's unproven, but I'll give it another go. I'll give it a last go.

Allen

You do yourself a disservice. Come on.

Tim Graveney

I think the key thing that I would like to say here, which knits everything together, and you've heard it echoed already, but I'll do it one last time, never stop talking to other people. I think I'm pretty good at my job. I really hope so. And in moments where I get thoroughly reflective, I actually allow myself these days to put myself on the back occasionally. But I don't know everything. I really don't. In fact, I barely know anything at all. And even if I think that I know quite a bit, I guarantee that if I actively listen on to the perspectives of others, then I'm going to be even better in my role.

And you'll never know, you just never know when it's going to be important. So just very quickly, for example, I attended one of your sessions recently on multi-generational working. And in the discussion, there was a concept of reverse mentoring with which I'm familiar enough, but then pairing. And I am working on that this week. I've come into work and I'm actually working on what we can do around that. And that's because I had the privilege of listening to it, albeit with Steps, but I had the privilege of listening to it from somebody else. So, keep listening, keep listening.

Allen

Well, very wise words, Tim. And unfortunately, that's about all the time we have left for this episode. So, thank you, Tim, for joining us. It's been a really engaging and thought-provoking discussion. Do you want to let the listeners know where they can connect with you on socials or LinkedIn, if you want to share that information?

Tim Graveney

Yeah, absolutely. Well, there aren't too many Tim Graveney's on LinkedIn. The other is more famous than I am, actually. And if you know your cricket, you might know something about him. But I'm the younger of the Tim Graveney's. And my profile picture, as all good profile pictures on LinkedIn, is 15 years younger than you see me today. So, please do find me on LinkedIn.

And I'm delighted to offer you my company's email address as well, which is [ethicsandcompliance](mailto:ethicsandcompliance@hcahealthcare.co.uk), all one word there at hcahealthcare.co.uk. That will come straight through to me, and I would be delighted to share any thoughts with you and to take any discussion points forward with you, including, of course, challenges.

Allen

Well, Tim, thank you for that offer and listeners will put all that stuff in the show notes as well so you can have access to that. And thank you for joining us on this episode. If you'd like to know more about steps and steps to change, make sure you visit our website, find us on LinkedIn or sign up to our newsletter. Again, we'll put all those in the show notes. If you're interested in how Steps could partner with you, or your organization to support your needs, you can send us an email or fill out the form online at www.stepsdrama.com.

Is there a subject area you'd like to hear us explore? If so, reach out to us via the email or on our socials and let us know. As always, thank you to our production team. We couldn't do this without you. I am your host, Allen Liedke, and we look forward to you joining us on the next episode. Until then, remember you too can See It, Own It, Change It, and Live It.