



Interview with Beverley Dewhirst, Head of Compliance at Experian

1) What roles and responsibilities are in place to manage data compliance at your organisation?

I have recently joined Experian as the new Head of Compliance; I have worked in the Credit Reference industry for 15 years and have brought that experience to Experian. The role of the compliance department is fundamental in any data business and must have effective risk management.

We use a 'three line of risk' approach in the structure of the Compliance Department;

- **Regulatory Developments & Oversight** – this is where we ensure that we communicate relevant regulatory & industry developments and ensure that these are embedded in to Experian's policies and processes where required.
- **Policy & Training** – where we ensure that Experian has robust and effective policies and processes in place to ensure data compliance. We hold a central repository of all Experian's policies so these can be managed effectively to ensure they are kept up to date by the policy owner and communicated regularly across the business.
- **'Business as Usual' Compliance** – where everything related to the use of data is reviewed for sign-off, this includes new products, enhancements to existing products and new client sign off. We also handle numerous ad-hoc compliance queries from both internal stakeholders and external clients.

We also work closely with other areas within Experian, such as Legal, Audit, Information Security, Business Continuity and Disaster Recovery to ensure that data compliance is consistent across the whole business and that policies and procedures are adhered to by all areas.

2) How do you measure data compliance efficiency and effectiveness across the organisation?

One important measure of the effectiveness of our compliance strategy is the volume and outcome of cases received from regulators such as the Information Commissioner's Office. I'm happy to say that these are relatively few!

We also use feedback received from our internal stakeholders with regards to the way we deal with product sign-offs and other queries. If we feel that a department procedure needs to be changed to ensure that we process things more efficiently and effectively then we will do this – whilst ensuring that we remain data compliant of course.

3) Which systems, if any, are currently used to manage data compliance activities?

We have various methods in place within the Compliance Department to manage data compliance activities. These include (to name a few) a central task management system which keeps a clear audit trail of all queries received in to the Compliance Department inbox and a clear record of any compliance approval/sign-off provided. We also maintain a Policy Plan, Compliance Universe Plan and Risk Register, which provide details of the current policies in place throughout Experian, all regulation to which Experian is subject and all the

areas of the business which present the biggest compliance risk and how these risks are mitigated.

4) Data compliance is such a large task for an organisation, how do you break it down in to manageable chunks?

The 'three lines of risk' approach is a really effective way to do this. It ensures we have data compliance throughout all areas and stages of the business; from business as usual activities to anticipating and preparing for new regulatory & industry requirements.

Each member of the team has a clearly defined role within each of the three areas. We also ensure that there is a level of cross over between the team members so we are not at risk through key dependencies.

5) How do you manage employee buy-in and a positive compliance culture across Experian?

I think it's really important that all Experian employees see the Compliance Department as a partner in the business and build key relationships in order to facilitate a good understanding of the compliance obligations. We have embedded from the top down a culture of corporate responsibility which is fed into the policies and training.

We strive to ensure that anyone who contacts the Compliance Department for whatever reason has a positive experience. We do this by handling their query or request as quickly as possible and providing alternative solutions, when required.

Proactive communication is also important in creating a positive compliance culture. For example we provide compliance guidance to our sales force empowering them to advise a client on the most suitable and compliant product or service for the intended purpose. This also helps to create a positive experience for the client as it makes the sales process quicker and more efficient – they don't feel tied up with compliance 'red-tape'.

6) Which key pieces of legislation would you recommend an organisation become familiar with when it comes to managing contact data in a compliant fashion?

The Data Protection Act 1998 is the primary piece of legislation an organisation should become familiar with – specifically with regards to the use of consent clauses. This is one of the areas where we handle a lot of queries, especially where an organisation has not had sufficient consent clauses in place when collecting the original contact data.

Any organisations who are members of the Direct Marketing Association (DMA) would also need to be familiar with, and comply with, the DMA Code of Practice. This provides detailed best practice guidance on all aspects of direct marketing.
