

THE HUMAN FIREWALLTM

When Rules Stop Being Enough,
Real Compliance Begins.



SILVINA CORIA

Leadership • Governance • Risk • Compliance

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Real Compliance Begins.

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The Human Firewall™ is the title and name of the framework developed by Silvina Coria. The framework presented in this edition is version 1.0.

The cases in Chapter 8 have been anonymised and identifying details generalised to focus on transferable learning. They are not presented as accounts of named organisations. The startup scenario in Chapter 11 is illustrative.

This book is an educational and thought-leadership work. It does not constitute legal, regulatory, audit, or professional advice for any specific organisation or jurisdiction.

*“The centre of every Compliance initiative is a
person making a decision.”*

— Silvina Coria

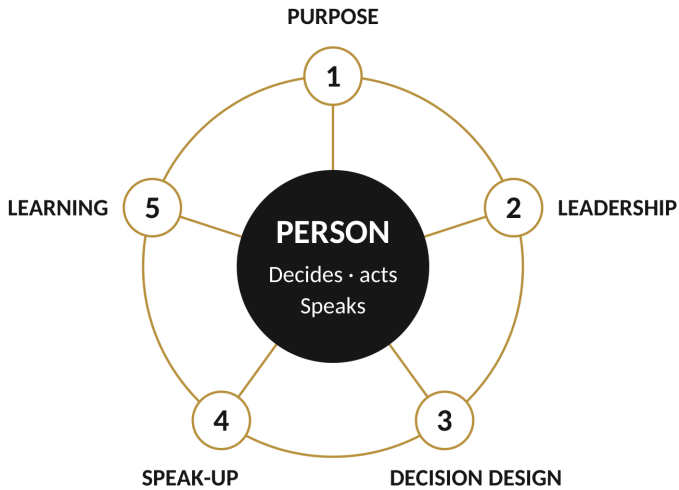
How to Use This Book

This short book is designed for leaders, board members, Compliance professionals, internal auditors, risk managers, lawyers, people leaders, and business executives who want a practical way to connect rules with real behaviour.

Read it in sequence if you are building the idea from first principles. Use Chapter 7 as the core framework. Use Chapters 8–11 for practical application and Chapter 12 for a 90-day start. Use the appendices as working tools with a leadership team.

The Human Firewall™ presented here is version 1.0: an evolving framework informed by professional practice, behavioural science, governance, audit, leadership, and ongoing dialogue with organisations and leaders. The intention is practical rather than doctrinal: ask better questions, improve decision environments, and learn.

The Five-Question Compass



- 1. Purpose** What are we trying to protect?
- 2. Leadership** What behaviour are we modelling?
- 3. Decision design** How do we make good decisions easier?
- 4. Speak-up** What can be said in time?
- 5. Learning** How do we measure and improve?

Figure 1. The Human Firewall™ compass for human-centred Compliance.

Contents

Introduction · The Moment That Matters	1
Chapter 1 · Compliance Has Always Evolved	4
Chapter 2 · Good People, Hard Choices	8
Chapter 3 · Context Is Part of the Decision	12
Chapter 4 · Culture at the Point of Choice	16
Chapter 5 · Leadership Is a Behavioural System	20
Chapter 6 · Speak Up Before It Is Too Late	24
Chapter 7 · The Human Firewall™: Five Questions	28
Chapter 8 · Three Worlds, One Question	32
Chapter 9 · Measure Behaviour, Learn Faster	37
Chapter 10 · AI Expands Judgement - and Responsibility	41
Chapter 11 · Trust Through Growth in Wine, Mining, and Startups	45
Chapter 12 · From Programme to Capability: A 90-Day Start	50
Epilogue · One Decision at a Time	55
Appendix A · The Human Firewall™ Diagnostic	57
Appendix B · The Ten-Minute Decision Map	59
Appendix C · A 45-Minute Leadership Conversation	61
Selected Sources and Further Reading	62
About the Author	65

*To my son: Let kindness be your compass and integrity
your shield. You make this mother endlessly proud.*

*And to all my colleagues in Alliance for Integrity, for their
commitment to a better world.*

The Moment That Matters

Everything else should help that person decide well.

There is a moment in every organisation that matters more than most policies, controls, dashboards, and training modules combined. It is usually quiet. It rarely appears on an organisational chart. Often nobody else is watching.

A person has to decide.

A manager is under pressure to close a deal before quarter-end. A buyer is asked to speed up a supplier's approval. A plant supervisor sees a shortcut that would save time. A lawyer notices that the technically correct answer may create an avoidable ethical problem. An auditor sees a weak signal that does not yet rise to the level of a finding. A new employee wonders whether speaking up will make them look difficult. A board member has to choose whether to ask one more uncomfortable question.

That is the real arena of Compliance.

For decades, organisations have invested in rules, codes of conduct, training, risk assessments, hotlines, investigations, controls, and assurance. Those capabilities matter. They are part of the institutional memory that allows organisations to operate consistently across markets, cultures, and regulatory systems. Yet the next stage of maturity asks a different question: how do we design the environment around people so that good judgement becomes easier, more visible, and more sustainable?

This book grew out of that question.

My career gave me the unusual privilege of observing organisations from very different angles. I worked in multinational companies, in technology and fast-growth environments, in business and reputation consulting, and later in the multilateral system. I led internal oversight functions, worked across audit, investigations, evaluation, quality, risk, and governance, and spent years watching how leaders behave when the stakes are high. More recently, my work with executives and organisations has taken the question even closer to

the point of decision: what actually helps a leader make a sound choice when speed, ambiguity, incentives, politics, and human emotion all arrive at the same time?

The answer is rarely one thing.

Rules provide direction. Controls provide structure. Risk management helps us prioritise uncertainty. Internal audit provides independent assurance and insight. Culture influences what feels normal. Leadership signals what truly matters. Behavioural science helps us understand how people process choices. Technology can improve visibility and speed. Trust is what people experience when all these elements work together consistently.

The Human Firewall™ is my working framework for bringing those dimensions together.

The phrase is intentionally provocative. In cybersecurity, a “human firewall” has often been used to describe employees as a line of defence. My use is broader. I am interested in the organisation as an architecture for human judgement. The framework does not ask individuals to compensate for weak systems. It asks leaders to build systems, cultures, incentives, conversations, and forms of oversight that help people exercise sound judgement in the first place.

At the centre is a person. Around that person are five leadership questions:

1. What are we trying to protect?
2. What behaviour are we modelling?
3. How do we make good decisions easier?
4. What can be said in time?
5. How do we measure and improve?

These questions are simple enough to remember and serious enough to use in a boardroom, an audit committee, a project team, a family business, a mine, a winery, a technology company, or an international organisation.

This is version 1.0 of the idea. It is deliberately open. I am continuing to test it through cases, conversations, surveys, leadership work, and professional practice. That openness is part of the method. The purpose is not to announce

a final doctrine. It is to create a practical language that helps leaders ask better questions about people, risk, integrity, and trust.

The central thesis of this book is equally simple:

The centre of every Compliance initiative is a person making a decision.

Everything else should help that person decide well.

LEADERSHIP PAUSE

- Which decisions in your organisation carry the greatest behavioural pressure?
- Where does a person need judgement more than another rule?
- What would change if Compliance were designed around those moments?

Compliance Has Always Evolved

The next generation of Compliance will still know the rules. It will also understand the system around the person who has to apply them.

Compliance has always evolved because organisations have always evolved.

The earliest forms of what we now call Compliance were closely connected to law and formal obligations: licences, reporting requirements, anti-bribery rules, labour standards, safety requirements, financial controls, and sector-specific regulation. In many organisations, the first question was understandably direct: what does the rule require, and how do we prove that we followed it?

That question remains essential. Mature organisations still need legal interpretation, documented procedures, evidence, traceability, escalation, and consequences. Yet modern Compliance has grown into something larger than a legal checklist. It now sits at the intersection of governance, risk, ethics, culture, reputation, data, sustainability, and strategy.

That expansion is not mission creep. It reflects reality.

A company may be technically compliant in one narrow sense and still create a serious risk in another. A sales practice may fit within local commercial norms and still damage trust. A procurement process may satisfy every formal step while creating unnecessary friction that encourages workarounds. A highly controlled process may produce weak outcomes because employees do not understand why it exists. A perfectly written policy may fail because it arrives at the wrong moment, in the wrong format, and in language nobody uses when the pressure is real.

This is where Compliance becomes an organisational capability rather than a department.

A useful way to understand the field is to distinguish several related disciplines.

Law defines the applicable obligations and rights. Ethics asks which choices are consistent with values and responsibilities, including in situations where the law leaves room for judgement. Risk management helps leaders identify uncertainty and decide where attention and resources should go. Controls translate expectations into processes, approvals, restrictions, reconciliations, evidence, and monitoring. Internal audit provides independent assurance and insight on whether governance, risk management, and control processes are designed and operating effectively. Compliance connects these elements to help the organisation prevent, detect, respond to, and learn from conduct and regulatory risk.

Culture is what turns all of them into daily behaviour.

That last sentence matters because culture is often treated as an intangible backdrop. In practice, culture becomes visible in decisions. Who gets promoted? Which targets create prestige? How does a manager react when a team member raises a problem? What happens to the person who slows a project down for a legitimate reason? Does “speak up” mean what the poster says it means? Can people apply judgement, or is every exception treated as disloyalty to process? What happens after an incident: blame, silence, or learning?

The evolution of Compliance can therefore be seen as a widening field of view.

The first field of view is rules. The second adds programmes: policies, training, reporting lines, investigations, risk assessments, monitoring, and incentives. The third integrates enterprise risk, governance, and controls. The fourth looks more deliberately at culture, ethics, and speak-up. The next stage places behavioural design and human judgement at the centre.

Each stage adds capability. Each stage remains useful.

The strongest organisations keep the discipline of the earlier stages while expanding the intelligence of the next ones. A human-centred approach does not weaken standards. It makes them more likely to work in real life.

This evolution is already visible in professional practice. The U.S. Department of Justice, in its Evaluation of Corporate Compliance Programs¹, asks prosecutors to consider whether programmes are well designed, applied earnestly and in good faith, and effective in practice. The language of effectiveness matters because it moves the conversation from policy existence to organisational reality. The Institute of Internal Auditors has also moved further into this territory. Its Organizational Behavior Topical Requirement², issued in 2025 and effective in December 2026, treats the human side of risk - observable actions, decisions, and interpersonal dynamics - as a subject that can be assessed through governance, risk management, and control.

That is a significant professional signal.

Behaviour is moving from the margins of assurance into the centre of it.

For leaders, this changes the questions worth asking.

“How many employees completed the training?” remains useful, but it becomes the beginning rather than the end. We can also ask: what changed after the training? Which behaviours are we trying to influence? Where do people still hesitate? Which process creates the greatest pressure to bypass controls? Where does a rule collide with an incentive? What makes a good decision easier in the moment that matters?

The discipline becomes more demanding because it becomes more practical.

A policy is relatively easy to count. A decision environment is harder to understand. Training attendance can be reported in a dashboard. Psychological safety, informal norms, and incentive conflicts require observation, listening, data, and professional judgement. Yet the payoff is substantial: the organisation begins to manage the conditions that produce behaviour, rather than only the consequences after something goes wrong.

This is also where Compliance becomes more strategic.

Trust, reputation, access to markets, investor confidence, regulatory relationships, employee retention, and operational resilience are all influenced by the quality of organisational decisions. A startup seeking its first or a

¹ See Selected Sources and Further Reading, p. 62, entry 14.

² See Selected Sources and Further Reading, p. 62, entry 17.

subsequent funding round needs to make that quality visible. Clear accountability, reliable information, proportionate controls, and honest conversations about risk help investors assess whether growth can be sustained.

Compliance is therefore part of how an organisation earns permission to grow.

The next generation of Compliance will still know the rules. It will also understand the system around the person who has to apply them.

That is the shift from documenting expected behaviour to designing for reliable judgement.

LEADERSHIP PAUSE

- Which part of your Compliance programme still measures existence more than effectiveness?
- Where has a control become ritual rather than protection?
- Which business objective would become easier if Compliance were treated as a capability?