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# Mind the gap— and the “E” in CECO

**T**he other day someone asked me on Twitter: “Donna, this might be a dumb question, but what does ethical culture have to do with compliance?”

I know I’m preaching to the choir here, but the reality is that for some compliance officers (and their bosses) this isn’t such a far-fetched question. But as former federal prosecutor Michael Volkov has observed, the “E” in “CECO” (chief ethics and compliance officer) is much more important than they think.<sup>1</sup> “Ethical culture leader” is part of the CECO day job.



Boehme

Unfortunately, for some in compliance and ethics, the “ethics” quotient of the job nearly fades to black in the face of their immediate priorities and over-stretched resources. It’s not hard to see how a compliance officer’s work plan (you *do* have a work plan, right?<sup>2</sup>) can be dominated by the daily need to put out fires, oil the squeaky wheel, and respond to new regulations and emerging risks. In the shadow of the immediate, a role as ethical culture leader may seem purely aspirational. But, the CECO who ignores this part of the job is making a big mistake that can undermine all the other work of compliance.

To the Twitter query above, I responded this way: “Ethical culture is not only the umbrella for Compliance, it is also the safety net.” In fact, the fully actualized CECO not only manages the overall compliance program, but also embraces the role of ethical culture leader as a critical part of their mandate, integrating it into every aspect of their work.

Among other things, the CECO as ethical culture leader:

- ▶ Facilitates candid conversations with the Board about ethical culture and what senior management must do to support it;
- ▶ Acts as the independent voice of ethical leadership in the C-Suite (I’m lookin’ at you, Walmart and GM);
- ▶ Works to educate and develop ethical leadership skills within the organization at all levels; and
- ▶ Is vigilant about combatting the destroyers of ethical culture, such as retaliation, bad role models, and lack of accountability.

The CECO is the one individual in the organization who, as subject matter expert of ethical culture, should lead the steady, consistent charge for transparency and accountability that are the umbrella and safety net of the compliance program. Because if not the CECO, then who?

As they say, when everyone is responsible for feeding the dog, the dog starves. The job of the CECO is to keep that dog top of mind and feed it well, every single day.<sup>3</sup> \*

1. Michael Volkov: “What’s in a Title?—CCOs versus CECOs.” *Corruption, Crime, & Compliance*, February 2, 2014 Available at: <http://bit.ly/corruptcrime>
2. Donna Boehme: “Compliance officers need a plan.” *Compliance & Ethics Professional*, July/August 2013: 25. Available at: <http://bit.ly/complistrat>
3. Donna Boehme: “The CCO as Ethical Culture Leader.” *Ethikos*, Vol. 28, No. 1, January/February 2014: 4. Available at: <http://bit.ly/complistrat2>

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