

# Compliance & Ethics Professional

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# The Anti-Bully Board Escalation Policy

Every CCO and compliance professional has run into a bully whilst trying to do their job well. The stories sound remarkably alike.

- ▶ Senior manager calls the CCO onto the carpet and demands to know the confidential identity of a team member who has called the helpline, as well as the confidential details of the resulting investigation.
- ▶ Senior manager threatens to “investigate” the way the CCO has overseen an investigation.
- ▶ Head of Internal Audit demands changes in an investigation report before it is viewed by the compliance committee, to change the outcome in a manner that will benefit a protégé and himself.



Boehme

My personal life policy when dealing with bullies is to do the exact opposite of what the bully is trying to make me do, on the time honored principle that, “BULLIES SHOULD NEVER WIN.” Where did this come from? Maybe it’s just my obstinate and stubborn nature. Or maybe my innate belief that a bully who is allowed to win will continue to practice bully behavior on other victims, so should never be thus encouraged or rewarded.

This is why every company needs to include in its Board Escalation Policy (You *do* have a Board Escalation Policy, right?), “Threats or attempts to intimidate or retaliate against the CCO or a member

of the compliance team are matters to be automatically escalated to the attention of the Board”. The beauty of nuclear weapons is that you rarely have to use them if everyone knows you have them, so the best protection for the Compliance function and the company’s compliance program is a well-known Board Escalation Policy.

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And needless to say, any company or Board that is serious about compliance should have a good, well-known Board Escalation Policy that protects its Compliance function as well as ensures that certain high-risk matters and behaviors come to its immediate attention. Because every company has *exactly* the compliance program it wants.<sup>1</sup> \*

1. Donna Boehme: “In Love & Compliance: You Get What You Want,” *The Corporate Strategists Blog*, April 16, 2014. Available at <http://bit.ly/d-boehme>

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