



corporatecompliance.org

Compliance & Ethics PROFESSIONAL®

A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

SEPTEMBER 2018



Meet Ibrahim Yeku, CCEP-I

Barrister & Solicitor
Solola & Akpana
Old GRA, Port Harcourt,
Nigeria



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by Joe Murphy, CCEP, CCEP-I

The executives ignore the training. What now?

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The company is rolling out its anti-harassment compliance training, and you want the officers to attend first. The CEO can't attend and already knows this stuff, according to her assistant. A few assistant vice presidents straggle in, and as you start the presentation, you notice that they all have their smartphones or tablets out, working on things they obviously consider more important than the training.



Murphy

Well, even in states that legally require training, they don't say the attendees cannot be on their smartphones. All you can do is request that they attend.

You may be right about the law. But you are wrong about your professional responsibility.

SCCE's *Code of Professional Ethics for Compliance and Ethics Professionals* has several provisions that apply. Rule 1.2 says we "shall take such steps as are necessary to prevent misconduct by [our] employing organizations." Training is clearly one of those steps, but if you let people skip the training or not pay attention, you are failing in this mission.

Rule 2.2 requires that we "ensure to the best of [our] abilities that employing organizations comply with all relevant laws." Your organization is legally required, at least in the U.S., to provide a workplace free from discrimination and harassment. Letting key

people miss the training, and allowing others to ignore it, is well short of the "best of [your] abilities."

What can you do beyond scheduling the training and crossing your fingers? Have you asked to meet with the CEO and junior officers to explain that skipping training sends a bad message to other employees?

If they ignore you, what then? Rule 2.4 states that we "shall keep senior management and the highest governing body informed of the status of the compliance and ethics program, both as to the implementation of the program and about areas of compliance risk."

Having a senior officer miss the training while others ignore it clearly undercuts the program. If key people aren't getting the message, other employees won't either.

... if you let people skip the training or not pay attention, you are failing in this mission.

Perhaps all you need to do is talk with the poorly performing executives, or you may have to tell them that you have no choice but to report this to the board. Either approach might work, but what won't work, nor meet our professional standards, is doing nothing. In other professions, it may be enough to give advice; in ours, nothing short of action is acceptable. *