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Preventing child sexual abuse: The role of the compliance professional

Compliance professionals can influence the ethical growth and development of youth-serving organizations and their child-abuse prevention systems.

Organizational policies should clearly define appropriate adult-to-youth boundaries.

A robust screening process includes more than criminal background checks.

Effective monitoring and supervision minimizes opportunities for privacy.

Responding procedures that address red-flag behaviors and policy violations can help identify and address problems before they rise to the level of suspected abuse.

The Centers for Disease Control previously estimated that as many as one in four girls and one in six boys will be sexually abused before the age of eighteen. Organizations across industries have learned a lot about sexual abuse over the years, including how it happens, what can be done to prevent it, and how to respond. Now with an increased media spotlight on sexual abuse allegations (historical and present) sweeping the nation, there are internal and external pressures to reevaluate and expand organizational safety initiatives for vulnerable populations.

Caring for people is serious business. Nothing can be more devastating than an incident or allegation of abuse to a child or vulnerable adult in care. Organizations are not powerless to protect their clients or themselves. Effectively preventing this risk must involve every individual within the organization, but compliance professionals play a unique and essential role in prevention.

Tasked with more than traditional industry compliance at the local, state, and federal regulatory level, compliance professionals are also keenly aware of and help shape an organization’s ethical compass. Compliance professionals have the potential to influence the ethical development of a department, organization, institution, and even an industry. A single incident of abuse can harm an individual for life, ruin the reputation of an organization, and deplete its financial resources. Abuse in organizations doesn’t have to happen.

Policies with well-defined standards of interaction and boundaries, robust screening mechanisms, timely and comprehensive training, effective
monitoring and supervision practices, and clear response systems are key to prevention. As a compliance professional, you may not directly oversee youth or community outreach programs in your organization, but you may influence or share oversight of integral internal processes. Evaluate each of the following tips and your ability to create a culture of safety at your organization.

**Implement and standardize policies**
Policies should clearly communicate that the organization has zero tolerance for abuse, define appropriate and inappropriate boundaries between adults and vulnerable individuals (including physical and verbal interactions and whether and under what circumstances electronic communication, outside contact, and one-on-one interactions are permissible), and provide employees and volunteers with clear procedures to manage high-risk situations. Standardized policies define a bandwidth for acceptable behavior and ensure employees and volunteers are not using personal, subjective judgment to guide their interactions with children or vulnerable adults.

Once developed, programs and departments must be held accountable to these standardized policies to ensure they are consistently followed and integrate corrective action for non-compliance. Communicating policies to all employees, volunteers, parents, and youth also helps to ensure everyone is accountable for adherence to the same standards.

**Screen for abuse risk**
The screening process is an organization’s first opportunity to control who has access to the children or vulnerable adults in your care. Have you ever thought about whether your organization is collecting the right information or getting the most out of this information?

Organizations should not solely rely on background checks to screen out candidates. Although background checks are an industry standard for individuals working with vulnerable populations, few offenders have a criminal record. Although background checks are an industry standard for individuals working with vulnerable populations, few offenders have a criminal record.4 There are additional challenges when screening teens or young adults, who may have limited accessible history.

A standardized application that is reviewed for red flag indicators can help eliminate unsuitable candidates early in the process. Include more than one individual in interviews, and use standardized, behaviorally based questions. Don’t forget to check professional and personal references, using standardized questions. Throughout the screening process, ensure the hiring manager has the benefit of all collected information, which can be challenging if hiring responsibilities are split between individuals or departments.

**Deliver the right training at the right time**
Training can provide employees and volunteers with the necessary tools to identify inappropriate patterns of behavior and high-risk activities or programs. To be effective, training should include more than
reporting mechanisms and the right content for the audience must be easy to access and use, and target the right people in the right way. Training curriculum is often treated as a one-size-fits-all approach. Because everyone has a different learning style, your organization’s abuse prevention training should accommodate these variances. It should also be easy to verify compliance with ongoing training requirements.

Emphasize monitoring and supervision
When employees and volunteers are adequately supervised, potential offenders are less likely to gain privacy with clients, because they face detection. When clients are adequately supervised, they, too, are less likely to engage in inappropriate interactions with others. Effective monitoring and supervision requires that employees and volunteers are not only aware of the organization’s policies and procedures, but that they clearly understand why the policies and procedures are important to organizational abuse prevention. Supervisors and administrators should be present in an unscheduled or unpredictable manner and visible within the organization. When observing ongoing programs, ensure supervisors know what to look for and take advantage of teachable moments.

Respond quickly and effectively
Many organizations are aware of their legal requirements to report suspected abuse and neglect within each of their individual states. However, does your organization have clear protocols for responding to suspicious or inappropriate behaviors that do not rise to the level of abuse? Suspicious or inappropriate behaviors provide opportunities to respond before an incident occurs. In many cases of abuse, employees will report seeing red flags or policy violations leading up to the incident, but may not report the observations to a supervisor. As a result, the supervisor may miss the opportunity to review a complete picture of the frequency or severity of an individual’s infractions and respond accordingly. Ensure that your internal teams know what to do with information or concerns when they have them, and that supervisors understand their role when reports are made.

Suspicious or inappropriate behaviors provide opportunities to respond before an incident occurs.

What this means for you
Creating a culture of safety means creating a work environment where every day, every worker keeps at the forefront the well-being of those in their care. Managing this risk takes a sustained, ongoing commitment to abuse prevention. But it also involves overlaying a compliance framework to everyday tasks like policy development, hiring practices, training, monitoring and supervision methods, and reporting mechanisms to keep an organization on the path to true commitment. *

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