



Meet
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**OIG 2013
Work Plan sheds
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Part 1**

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**Structuring the
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**Avoiding liability:
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**Best practices:
Training
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to combat fraud,
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Ellen Leinfuss

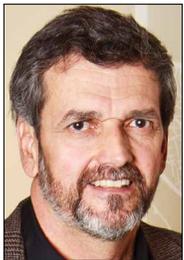
by Roy Snell, CHC, CCEP-F

Code of conduct

Please don't hesitate to call me about anything any time.

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Snell

I think most codes of conduct are too long. Many are 10 to 20 pages. We have lost our way with the code of conduct. It has been taken over by people who think it's a legal document. Whatever message you want to send to the employees about your expectations regarding their conduct gets lost in paragraph after paragraph about the laws that affect your organization. People seem to think they should cover every law and high risk area they can think of in the code of conduct. **TEACHING THE RULE OF LAW IS IMPORTANT!** Just don't do it in the code of conduct because once you do it, it is no longer a code of conduct, it is a legal manifesto.

I would cover laws and risk areas in policies, procedures, during education, new employee orientation, management meetings, etc. You have ample opportunity to educate people about the rule of law. You have only one document that commits employees to a code of conduct. It is the Code of Conduct not the Code of Every Law I Can Think of. I would write a one page code of conduct. Boeing has...and it is beautiful.

The code is intended to say to the people, "This is what we stand for, and if you don't follow this code you will be disciplined up to and including dismissal." Harsh you say? Enron, WorldCom, Tyco, Penn State, etc. didn't have a problem with people understanding the laws. They knew they were breaking the law. What they all failed to do was convince employees that their organization was serious

about the employees' conduct regarding following the rule of law. They didn't follow their code if they had one. If they had a code, it likely had a list of all the laws. Laws they were consciously breaking.

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Society has trouble with employees who choose not to follow the law and behave ethically. Employees need to know that it is not tolerated. Some people who break the law tell investigators that their leadership told them to do whatever it takes to get the job done. They tell the investigators the implication was that leadership wanted them to break the law or behave unethically. A signed, clear and short code of conduct (like Boeings) that states you will be disciplined if you break the law or behave unethically makes it difficult for people to say I did this with the encouragement of leadership. ☐