

# Compliance & Ethics Professional

December  
2016



A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

[www.corporatecompliance.org](http://www.corporatecompliance.org)



## Meet Raymie Hamann and Trina Pollman

Conference Networking Champions

See page 14

**27**

Working  
on ethical  
behavior  
Sarah Perry

**31**

Building an optimal  
compliance program structure  
for your organization  
Timothy Hedley and Ori Ben-Chorin

**35**

The  
costly  
white lie  
Shawn Washington

**39**

Corporate compliance  
has a long way to go:  
The Wells Fargo tale  
Catherine Colyer

by Roy Snell, CHC, CCEP-F

# The Stigma

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

+1 612 709 6012 Cell • +1 952 933 8009 Direct

[roy.snell@corporatecompliance.org](mailto:roy.snell@corporatecompliance.org)

[@RoySnellSCCE](https://twitter.com/RoySnellSCCE) [in /in/roysnell](https://www.linkedin.com/company/roy/snell)

**S**nitch. Rat. Traitor. Tattletale. Mole. Stoolie. Turncoat.

Let's be honest here, we are fighting an uphill battle with regard to employees reporting regulatory and ethical problems. I don't think we talk about "The Stigma" enough. We want it to go away or be untrue and immaterial. People have a dim view of reporting issues. But there is an easy way to overcome this negative perception of reporting issues. There is "The Stigma," but one simple act by you can overcome it. You just need to give them an "out."



Snell

When I was a compliance officer, I wandered the halls. I talked to people. I would make idle chatter for as long as was required, then I would slip in as innocuously as I could... "Seen any problems lately?" Not only did I find problems, but I found people were eager to talk. They were eager to talk, but they had not used the hotline. They wanted to share what was on their mind, but they had not come to me or anyone else in a position of authority. They did not want to *initiate* the conversation, but they wanted to *have* the conversation. The response to my simple little question was stunning. I not

only found problems sitting right under our oblivious noses, but one of them was huge.

There is "The Stigma," but one simple act by you can overcome it. You just need to give them an "out."

You can set up hotlines, have an anonymous drop box, do surveys, etc., but if you don't get out and talk to people, you are going to miss problems. Some people do not want to tell people in authority they have seen a problem, but they will not lie when you ask them, and I believe many of them want to be asked. Think about it. What is in their head when they think about reporting? Snitch, informer, stoolpigeon, stoolie, blabbermouth, tattler, rat, tattletale, squealer, mole, tipster, betrayer, infiltrator, plant, traitor, canary, turncoat, defector, etc. Frankly, it says something about our culture when we have so many derogatory words for one act. No wonder they don't want to initiate the conversation. Many people are dying to tell you something bad has happened. All their asking you do to is ask them if they have seen wrongdoing. They need an out. Give them the out. Ask them if they have seen any problems. They want to be able to say, "I was asked, and I wasn't going to lie." \*