



Bulletproofing an Organization

Why an Ethics Line is Imperative: One Reason of Many...

The following excerpts are taken from the Federal Guidelines Eight, Sentencing of Organization:

1. Organizations can only act through agents, and are liable for offenses committed by those agents.
2. An effective program to prevent and detect violations of the law has been reasonably designed, implemented and enforced.
3. At a minimum, the organization must have established compliance standards and procedures to be followed by its employees and other agents.
4. The organization must have taken reasonable steps to achieve compliance with its standards by having in place and publicizing a reporting system whereby employees and other agents could report criminal conduct by others without fear of retribution.


Reference: United States v. Mitsubishi Motor Manufacturing, United States v. United Auto Workers Union Consent Decree

1. The court appointed a third party to monitor compliance to the decree relative to the suit.

2. Company to revise procedures relative to sexual harassment.
3. Company to keep a twenty-four hour, anonymous complaint line in place.

Reference: Farragher v. City of Boca Raton, Florida

1. The city had a written policy against harassment, but no procedure (anonymous line) in place.
2. The United States Supreme Court ruled that by failing to establish a complaint procedure that would enable employees to report incidents without fear of retribution, the city acted unreasonably.



Vigilance is now a household word. Our government has established an Office of Homeland Security. The very last thing a country or a corporation needs is to be weakened from inside. Employees must be vigilant. Corporations must be vigilant. We can protect corporations by providing a conduit for information that can prevent civil, criminal, and catastrophic events from occurring. Knowledge is power. To be forewarned is to be forearmed.