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Exit interviews: A missed opportunity to reveal compliance risk

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Exit interviews are sometimes perfunctory affairs—a chance to fill out some paperwork, ask a few questions, and end things as happily as possible. Much of the interview depends on the reason for the employee’s departure; the conversation will be different if the employee was asked to leave, chose to depart for a job at a competitor, or is moving on to something completely different.

Whatever the reason for the separation, the exit interview is the last chance for the company to uncover any issues or wrongdoing that the employee is aware of at a time when the employee has much less to lose by sharing their concerns.

It’s also an opportunity to gather positive feedback. One compliance professional noted, “Exit interviews aren’t just an opportunity to identify what needs fixing, but also an opportunity to identify what needs celebrating and replicating.” Unfortunately, as another compliance officer observed, the interview tends to “suffer from a lack of imagination. They have been treated like an administrative step that probably grew out of the meeting to give back your ID and computer.”

That’s a shame because, as Joe Murphy, senior advisor at Compliance Strategists, has noted, “They reach employees at a time when they may be most willing to speak up and discuss what they have seen in the company. They can be a prime way to inquire about retaliation—finding out about actual cases and about employees’ perceptions.”

It could also be argued that exit interviews should be a part of ongoing monitoring efforts. In the June 2020 U.S. Department of Justice *Evaluation of Corporate Compliance Programs*, one of the questions asked is: “More generally, what testing of controls, collection and analysis of compliance data, and *interviews of employees* and third parties does the company undertake?” [emphasis added].^[1] Arguably an interview of a departing employee may fall under this question.

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