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### Does your workforce exhibit integrity as a core value?

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The long-term success of organizations is built upon the integrity and engagement of their employees. Organizations face numerous challenges in their daily operations that result from the actions of their workers, both longtime staff and new hires. Accordingly, organizations must select candidates who possess core values and display a level of integrity that will make a positive difference in their future. Employees who exhibit integrity and core values that align with the organizational culture can help prevent unethical conduct in the workplace that often leads to the compliance function employing valuable resources to conduct workplace investigations and disciplinary actions, rather than focusing them on other important aspects of the compliance program.

Integrity is not necessarily a learned trait, so it is important to hire candidates who already demonstrate productivity and positive values through professionalism. These individuals must also understand the steps that are required to promote integrity throughout all levels of the organization. Therefore, integrity should be a key component of all phases of employment, starting with the recruitment process.

### Expanding due diligence to promote a culture of integrity

The U.S. Federal Sentencing Guidelines call on organizations to exercise “reasonable” due diligence when hiring employees to review whether the individual “has engaged in illegal activities or other conduct inconsistent with an effective compliance and ethics program.”<sup>[1]</sup> Although the specific verbiage within the guidance refers to “authority personnel,” organizations also have a duty to ensure this of all members of the organizations. While most organizations understand the critical need to conduct background checks, verify licensure/education, perform exclusion checks, contact previous employers, etc., the process should begin at an earlier stage—just because someone has not engaged (or been caught) in illegal or unethical practices in the past, it does not mean the organization can expect that trend to continue. Additionally, demonstrating efforts to perform these due diligence processes, such as contacting previous employers to get as much information as possible, may help prevent unnecessary risk for the organization, such as a negligent hiring lawsuit. Therefore, organizations must strategize supplementary tactics to exercise their due diligence requirements most effectively.

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