

Tools & Tips to Help Your Organization Create a Happy, Ethical and Compliant Holiday Season

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If you have HR or ethics and compliance responsibilities in your organization, the annual escalation of risks during the holiday season often falls to you to manage. In this article we've compiled some practical steps you can take—and tools you can use—to make the holidays happy, not harried, for you and for your organization.

1 Raise Employee Awareness of Your Corporate Gift Giving and Receiving Policies

This is a great time to raise [employee awareness](#) (and vendor awareness as well) of your organization's commitment to business ethics and social responsibility related to gift giving and receiving. You may want to:

- **Deploy Short-Form Refresher Training on Your Gift Giving and Receiving Policies:** Short-form or "burst" training modules are five to seven minute learning experiences that are designed to be deployed quickly and affordably. Burst Learning helps raise awareness of key trending issues—without a major impact on seat time.
- **Call Out Important Aspects of your Policies Through Multiple Communication Channels:** Share the most important aspects of your policy through a few awareness-building channels. Highlight issues such as:
 - Where to locate your organization's gifts and hospitality policy—and where to go for guidance or to report an issue.
 - Appropriate limits for individual gifts/favors/entertainment given and received with external third parties—plus any annual limits on the amount that can be accepted from one source.
 - Special mention of limits on gifts and entertainment for government officials or federal contractors, if you work with them.
- **Don't Forget Internal Gift-Giving Guidelines:** Gifts between supervisors and employees should be suitable to the workplace and neutral, such as a gift card or donation in the recipient's name. Anonymous corporate gift exchanges among employees can be fun—or they can backfire badly when someone receives an embarrassing or offensive item.

2 Do Some Preventative Planning for Company Holiday Parties

All sorts of issues can surface when your organization hosts a holiday party. It's best to do a little preventative planning:

- **Build in Diversity:** Consider the types of group sensitivities that can be stirred up by office holiday parties. Ask for employee opinions on what type of party employees would like in order to include diverse ideas in the planning. Call the event a "Holiday Party" rather than, for example, a "Christmas Party" and keep decorations secular to avoid a potential religious discrimination allegation. And include all levels of employees, diverse ethnicities and both genders in any setup and clean-up activities. Also ensure that the venue and activities you choose can be accessed by the disabled.
- **Limit Alcohol Availability:** Drunken partygoers can get into a lot of trouble, causing liability and reputational damage for your organization. If you must serve alcohol at a company holiday event, consider:
 - Offering only beer and wine
 - Requiring tickets for drinks, rather than an open bar
 - Using professional bartenders to serve, which leads to less drinking than self-serve
 - Asking partygoers to pay for their drinks
 - Offering vouchers for taxi rides home, and
 - Providing plenty of non-alcoholic beverages and food.
- **Mitigate the Risk of Inappropriate Party Behavior:** Long time relationships, alcohol and a casual festive atmosphere can lead to less than professional behavior. Send a reminder before the party that all company policies apply to this event—including the policy against [workplace harassment](#). It may be helpful to ask an HR person to circulate during the party to watch for inappropriate behavior that can be stopped early. Despite your best efforts, statistics show that some bad behavior is likely to occur, which must be promptly managed.

3 Remind Management of Their Crucial Role in Maintaining a Strong Corporate Culture

Managers serve as role models in all workplace matters, including workplace holiday gatherings. This is a good time to remind them about this and their duty to enforce (and comply with) relevant policies. Even parties held off-campus are bound by the organization's behavioral standards.

During a holiday party, managers are responsible for their own appropriate conduct and for monitoring employee conduct so they can intervene when necessary to prevent risky activity (e.g. flirting, over-drinking, suggestive dancing or touching) from escalating. If complaints surface, managers should act quickly to appropriately handle the issue and to protect the complainant from [retaliation](#).

Mitigate Risks Related to Social Media

Not that long ago, the evidence of holiday party indiscretions was mostly limited to water cooler stories that persisted for a couple of weeks. Now with smart phone cameras and social media sites, that video of the boss—dancing on the bar in a Santa hat and sporting your company logo on his shirt—can go viral in a day and stick around forever. If you do not have a [social media policy](#) yet, the pre-holiday party season is an excellent time to develop one.

Keeping policies up to date with your risks, and making sure the workforce is aware of them shouldn't be a holiday-related activity only, but a year round commitment. Cheers to a happy, ethical and compliant holiday season at your organization!



About The Author

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Mary Bennett, R.Ph. is a former vice president of NAVEX and a pharmacist by training. She previously served as vice president in the Compliance and Integrity office at Caremark, where she implemented the requirements of one of the first government agreements in healthcare. Mary works across all industries for the Advisory Services team, creating and facilitating award-winning training programs, conducting large and small program assessments, developing compliance communications and helping clients develop best practice programs from the ground up.