

CEP Magazine – March 2023



Gabriela Roitburd (gabiroit@hotmail.com.br) is a speaker, researcher, and freelance compliance professor at LEC – Legal, Ethics & Compliance in São Paulo, Brazil.

Harassment of compliance professionals: Is your company prepared to investigate?

An interview with Gabriela Roitburd, LLM, CCEP-I

CEP: Before we dig into your research about compliance professionals that met with harassment, please tell us a bit about LEC – Legal, Ethics & Compliance and your history with the organization.

GR: LEC is one of the largest compliance communities in Latin America. It was created in 2012 by a group of compliance professionals in Brazil who wanted to discuss the project law that would become the current Brazilian anti-corruption law, also known as the Brazilian Clean Company Act (Law # 12.846/2013). Since then, LEC has never stopped growing and innovating as they continuously organize compliance congresses, courses, certifications, projects, blogs, podcasts, and programs. In 2018, I was invited to teach a class, and in 2019, I was accepted into their Compliance Mastermind program. As part of this program, the then-35 members were asked to write compliance-related articles that would be compiled into the second volume of the Compliance Mastermind collection. My contribution to the edition, which was released in 2020 and named *Compliance Beyond the Manual*, was an article that I coauthored with my colleague from the program, Rosimara Raimundo Vuolo, entitled “Let’s Talk About the Pink Elephant?—real harassment cases suffered or addressed by compliance professionals in exercising their profession.”^[1] For the third volume, I proposed a few topics to the program coordinators, and they picked the suggestion to write a continuation of the first article—this time focusing on harassment exclusively suffered by compliance professionals. As the third volume of the collection focused on the authors sharing tips and advice based on their experiences and/or research, I thought that writing about this topic could be a good contribution to raise awareness about something so sensitive and rarely discussed. I entitled this new article, “Speaking a Little More About the Pink Elephant—real harassment cases whose victims are compliance professionals.” It was published with articles written by other colleagues from the program in December of 2022 when the third volume of the Compliance Mastermind collection, titled *Career Insights for Compliance Officers*, was launched. Please note that both mentioned articles were published in Portuguese and that I have freely translated their titles into English.

CEP: You interviewed 50 compliance professionals over the course of four months. How did you find your participants?

GR: For this research, I targeted colleagues based in Brazil and made sure that half were male, and half were female. It turned out that in four months, I ended up consulting a total of 50 cisgender colleagues, but none from my current employer. I started by inviting a few closer colleagues from my network—those who I met during benchmarking activities and compliance-related events. I also reached out via LinkedIn to some colleagues who are well-known compliance professionals working in Brazil. At the end of each interview of this first wave, I asked the interviewees to refer other colleagues. For the second wave of interviews, I was referred to several

colleagues who, in turn, referred other colleagues. Some preferred to remain anonymous, and those conversations were intermediated by the person who referred them. I noticed that the theme generated either great interest (by those who found it a pioneering idea that could enlighten many colleagues) or great concern (by those who were not comfortable discussing the topic for different reasons, especially fear of exposure for individuals and/or legal entities that they worked for at the time of the harassing events). I want to highlight that prior to releasing the article for publication, I took all precautions to eliminate what I called “identifiable elements” to avoid the identification of individuals and/or legal entities. I also consulted each colleague to request their approval for the final wording of their stories. All of them approved what I wrote, with only a few minor adjustments.

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