

## CEP Magazine - December 2020 Culture assessments: The short course

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As a matter of law and common sense, any compliance and ethics (C&E) program assessment should include a healthy dose of culture. But where should one begin?

To start, culture needs to be defined. Perhaps the most commonly used definition in this setting is, "The way things are done around here." Another is, "The sum of the reflexive actions or inactions that take place."

Next, one should assess culture for certain key characteristics and contexts. These include, but are not limited to:

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