

Why Monitor?

“The organization shall take reasonable steps...to ensure that the organization’s compliance and ethics program is followed, including monitoring and auditing to detect criminal conduct,” including “monitoring through regular ‘walk-arounds’ or continuous observation while managing the organization.”

- U.S. Sentencing Guidelines

Purpose: To identify and proactively address program opportunities on a regular basis



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Monitoring & Response Basics

Assess

- Conduct risk-based audits
- Conduct program improvement reviews

Respond

- Create escalation protocol
- Regularly analyze data

Improve

- Conduct proactive mitigation efforts
- Implement metrics to measure Ethics & Compliance behavior

Monitoring as an ongoing activity

Feedback mechanisms used to ensure effectiveness of controls

Utilize results to proactively address and mitigate compliance risks



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[Corporate Compliance Essentials - Part 5](#)
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"Part 5: Internal Investigations"