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

<u>Purpose</u>: To identify and proactively address program opportunities on a regular basis



Monitoring & Response Basics

Conduct risk-based audits
 Conduct program improvement reviews
 Create escalation protocol
 Regularly analyze data
 Conduct proactive mitigation efforts
 Improve
 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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Title search: Part 6: Internal Investigations

Also available as part of the eCourse

<u>Corporate Compliance Essentials - Part 5</u>

<u>Internal Investigations</u>

First appeared as part of the conference materials for the 2017 LIVE VIDEO WEBCAST Corporate Compliance Essentials (Part 5 and 6) session "Part 5: Internal Investigations"