

# Why Monitor?

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*“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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2017 LIVE VIDEO WEBCAST Corporate Compliance Essentials (Part 5 and 6) session  
"Part 5: Internal Investigations"