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
 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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Title search: Part 6: Internal Investigations

Also available as part of the eCourse Corporate Compliance Essentials Complete Series

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