



# THE POLICY ENFORCEMENT TEAM: ROLES AND RESPONSIBILITIES

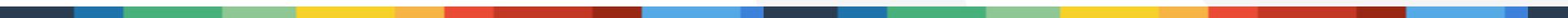
THE POLICY MANAGEMENT ILLUSTRATED SERIES

**SPEAKERS**

**Michael Rasmussen, GRC Research Analyst and Pundit, GRC 20/20 and OCEG Fellow**

**Robert O'Brien, CEO, MetaCompliance**

**Moderator: Carole Switzer, Co-Founder and President, OCEG**

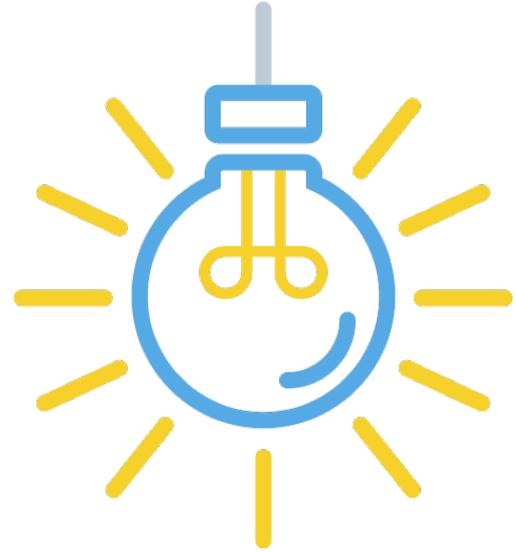


# Housekeeping

- Download slides at <https://go.oceg.org/the-policy-enforcement-team-roles-and-responsibilities>
- Answer all 3 polls
- Certificates of completion  
(only for OCEG All Access Pass holders)
- Evaluation survey at the close of the webinar
- Find the recording on the Resource tab of the OCEG site, under Archived Webinars

# Learning Objectives

- Describe the roles of each part of the organization in enforcing policies
- Define methods for compliance metrics and assessments
- Determine how to manage exceptions and apply policies in the extended enterprise



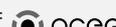
# Poll 1

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- a. Yes, I have an All Access Pass and I would like to receive a Certificate of Completion for this event
- b. Yes, I have an All Access Pass but I do not need a Certificate of Completion
- c. No, I do not have an All Access Pass but I would like to get one and receive CPE credit for this and future webcasts I attend
- d. No, I do not have an All Access Pass and I don't want to buy one at this time (so I won't get CPE credit for this event)

# How to implement and enforce policy compliance

This illustration advises on how to implement and enforce policies in the organization. A well-written policy that is not adhered to can become a liability and increase exposure to the organization. Policies that are complied with become assets that help the organization direct behavior, reliably achieve objectives, reduce uncertainty, act with integrity, and enhance corporate culture.

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## INVESTIGATIONS & REPORTING

Investigations, and related systems such as hotlines, provide insights into whether policies are being enforced and show that the organization takes policies seriously. Insight from investigations can tell us how policies are understood and operating.



## COMPLIANCE



The compliance department provides oversight and accountability by ensuring that policies are adhered to, monitoring for actions of non-compliance, and overseeing action plans to correct them.

## HUMAN RESOURCES



HR professionals not only ensure that policy adherence is covered in employee training and communication programs, but also that compliance is included in job descriptions, annual reviews and performance evaluations.

## LEGAL



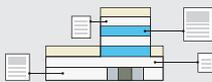
Legal provides regulatory guidance to the organization and ensures that incidents are investigated and resolved in a way that reduces risk and liability to the organization.

## PROCEDURES & CONTROLS



Policies govern and authorize associated procedures and controls that are embedded within business operations and processes.

## INTERNAL AUDIT



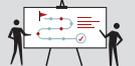
Internal Audit provides independent and objective assurance that policies are followed across the organization. Operational audits routinely include policy conformance.

## OPERATIONS



Policies are lived out in the business operations and processes - it's where the 'rubber meets the road' in aligning the existence of policies with everyday organization behavior. Effective policies protect an organization and its operations without unnecessarily inhibiting them.

## MONITOR, TEST & ASSESS



Effective policy management requires ongoing assessment to assure policies are designed and operating properly, and that the business runs efficiently and smoothly while in compliance.

## PREVENT & DETECT NON-COMPLIANCE



Policy communication helps prevent non-compliance, and hotline. Reporting systems detect non-compliance. Both processes are required for effective policy implementation and enforcement.

## MANAGE EXCEPTIONS



- Policy enforcement is not always possible. Exceptions happen when the organization cannot comply with a policy or when the policy is subjective or requires excessive clarification.
- Organizations need processes to authorize, track, monitor and review exceptions.
- Those who authorize exceptions must have authority. Limits should be set so exceptions are regularly reviewed and not granted for extended/unreasonable time periods.
- Exceptions must be documented and available to auditors and regulators upon request. Organizations that demonstrate exception management are better able to defend their policy management processes.
- Organizations should institute compensating controls as part of exception approval until policy revisions are made or the organization is brought into full compliance.

## EXTENDED ENTERPRISE CONSIDERATIONS



- The organization does not stop with traditional brick and mortar - modern organization is a web of business relationships that cross boundaries.
- Clearly define which policies cross business relationships and ensure compliance is covered in contracts.
- Periodically communicate policies across all business relationships and provide training where needed.
- Require business partners to undergo a minimum annual self-assessment process to attest to their compliance status to governing policies, procedures, and controls.
- The organization should have defined processes to exercise right to audit clauses/inspections to validate compliance to policies and contracts in extended business relationships.

## REPOSITORY

Technology enables policy implementation and enforcement by creating a repository of all policies, procedures, and controls that are cross-referenced to each other and not treated as isolated documents.



## CONSISTENCY

Technology creates a consistent environment to conduct assessments, track issues of non-compliance, and take corrective actions. Technology allows an organization to easily and efficiently manage hundreds to thousands of policies especially during audits and assessments.



## ACCOUNTABILITY

Technology provides for a complete picture and defensible audit trail of the 'who, what, when, where, how and why' including the role and actions of each individual.



## THE BENEFITS OF TECHNOLOGY

### AUTOMATION

Technology enables the automation of workflows and tasks to complete audits and assessments related to policy compliance. No longer is the organization encumbered by unanswered or lost emails or documents that are out of sync.



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# Discussion Questions

- Consistent application of policies requires the support and direct involvement of human resources teams as well as managers and supervisors at all levels of the organization. Let's start by talking about the various roles in policy enforcement -- Who needs to be involved?
- What are the primary tasks for each role?
- How do they coordinate?

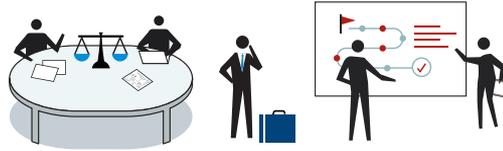
# Key Roles in Policy Enforcement

## COMPLIANCE



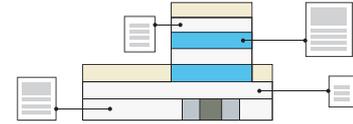
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## HUMAN RESOURCES



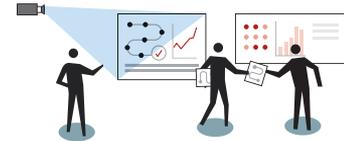
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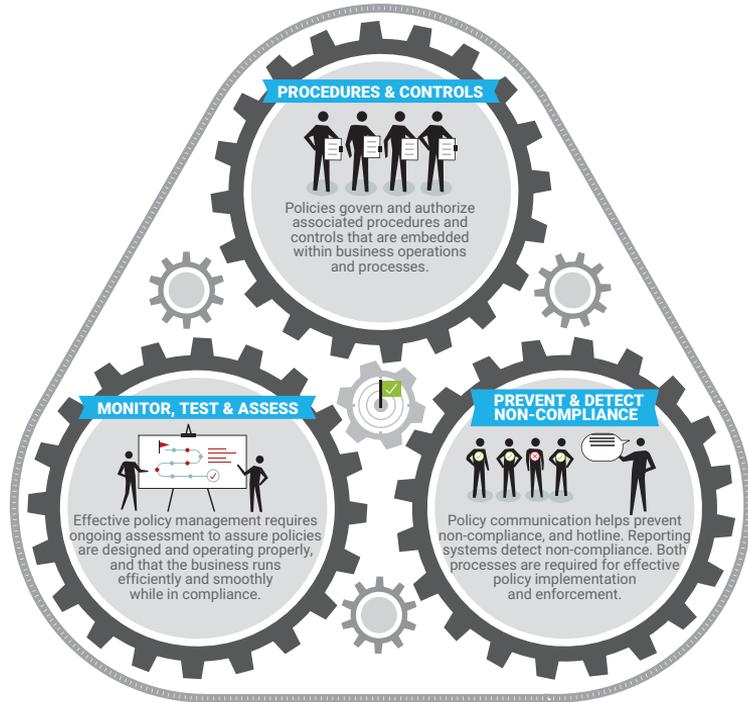
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# Coordination of Implementation and Enforcement



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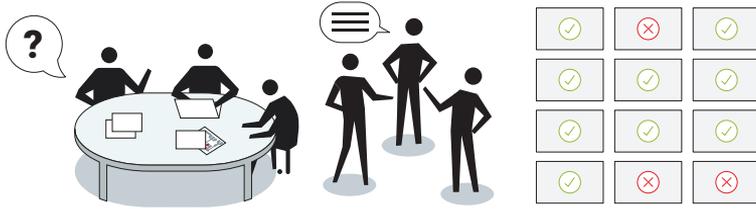
- Every role contributes to coordinated activities
  - Enforcement of policies
  - Monitoring and testing
  - Prevention and detection of non-compliance

# Discussion Questions

- Let's talk about the problem of exceptions—from time to time there is a need to allow an exception to a policy. The problem is that organizations often have no visibility into what exceptions to policies have been granted or implemented. How should organizations go about granting, documenting and managing exceptions?

# Granting Exceptions to Policies

## MANAGE EXCEPTIONS



- Policy enforcement is not always possible. Exceptions happen when the organization cannot comply with a policy or when the policy is subjective or requires excessive clarification.
- Organizations need processes to authorize, track, monitor and review exceptions.
- Those who authorize exceptions must have authority. Limits should be set so exceptions are regularly reviewed and not granted for extended/unreasonable time periods.

- Exceptions must be documented and available to auditors and regulators upon request. Organizations that demonstrate exception management are better able to defend their policy management processes.
- Organizations should institute compensating controls as part of exception approval until policy revisions are made or the organization is brought into full compliance.

- Establish specific authority to grant exceptions
- Ensure time and scope limits are set
- Document exceptions for audit and regulator review
- Establish compensating controls when exceptions are granted
- Ensure no conflict of interest in person granting exceptions

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# Poll 2

Does your organization have a clear methodology for granting of policy exceptions?

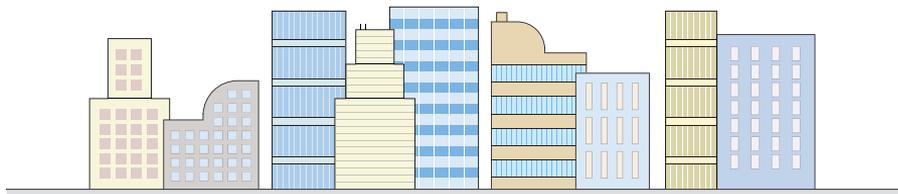
- a. Yes for the entity
- b. Yes but only within departments
- c. No but planning to do so
- d. No
- e. I don't know

# Discussion Questions

- What about policy enforcement in the extended enterprise?
- Should or can organizations require third parties to comply?

# Enforcement in Extended Enterprise

## EXTENDED ENTERPRISE CONSIDERATIONS



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- Define which policies should apply to third parties
- Include in contract terms
- Provide related communication and training
- Require annual self-assessment and attestation of compliance status
- Establish audit rights and process for validating compliance in extended enterprise

# Discussion Questions

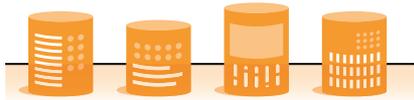
- How would technology help with policy exceptions?

# Benefits of Purpose-Built Technology for Policy Enforcement

## THE BENEFITS OF TECHNOLOGY

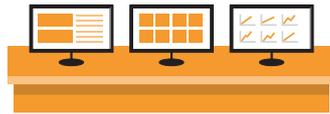
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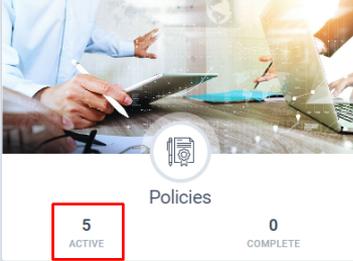
# Poll 3

Does your organization use technology purpose built for policy management?

- a. Yes for the entire entity
- b. Yes but only in some areas
- c. No we adapt other technology or use spreadsheets
- d. I don't know

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**1.2**

Consequently, MetaCompliance and each of its businesses must take the appropriate steps to ensure that it and all its employees and those acting on its behalf meet all legal and regulatory requirements governing the lawful and ethical conduct of business;

- ensure all breaches or suspected breaches of this policy are fully investigated and, if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition;
- make all employees aware of their personal responsibilities and adhere strictly and at all times to this policy;
- provide information to all employees and further guidance if they have any question or uncertainty regarding these requirements;
- provide information to all employees on the procedures available to them to report any breach or suspected breach of this policy, in accordance with the Group's policy on The Requirement for Written Codes of Ethics for employees (incorporating) Whistleblower Protection;
- include in agreements with third parties, in connection with international ventures or projects, appropriate clauses to ensure that persons who are acting on MetaCompliance's behalf do not engage in any illegal, improper or questionable conduct, particularly if there are factors that might increase the risk of breach of this policy, such as accepted custom and practice within the country of operation;
- prohibit employees or persons and entities acting on behalf of MetaCompliance to receive, offer, promise, improperly influence payment, authorise payments or

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Testing Process



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The process behind raising bugs.

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## REASON FOR EXEMPTION:

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MetaCompliance is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. MetaCompliance has zero tolerance toward such behaviour. Losses due to fraud, bribery and all other corrupt business practices can be more than just financial in nature, they can potentially damage the MetaCompliance's reputation as well. The reputation of MetaCompliance for lawful and responsible business behaviour is of paramount importance and is one of its greatest assets.

## 1.2

Consequently, MetaCompliance and each of its businesses must take the appropriate steps to ensure that it and all its employees and those acting on its behalf: meet all legal and regulatory requirements governing the lawful and ethical conduct of business;

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- provide information to all employees on the procedures available to them to report any breach or suspected breach of this policy, in accordance with the Group's

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I do not wish to agree to this Policy at this current time.

Cancel

Send Request

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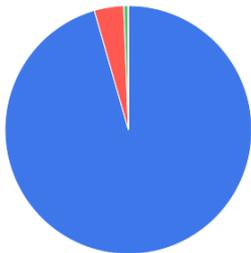


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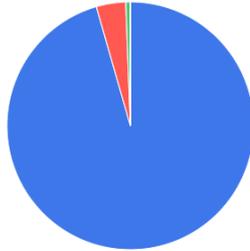
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### Overall Policy Adoption



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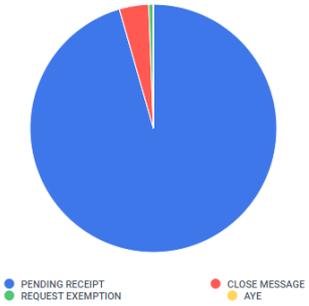
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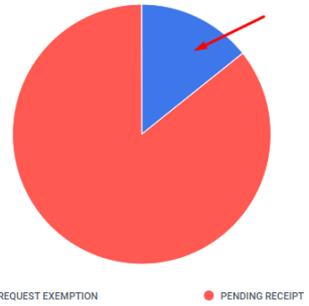
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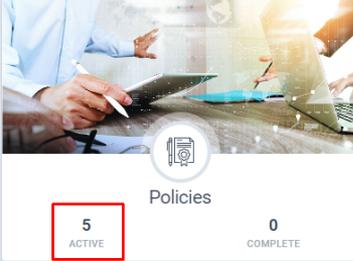
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Development Process

Development Process Policy v2

practices can be more than just financial in nature; they can potentially damage the MetaCompliance's reputation as well. The reputation of MetaCompliance for lawful and responsible business behaviour is of paramount importance and is one of its greatest assets.

1.2

Consequently, MetaCompliance and each of its businesses must take the appropriate steps to ensure that it and all its employees and those acting on its behalf: meet all legal and regulatory requirements governing the lawful and ethical conduct of business;

- ensure all breaches or suspected breaches of this policy are fully investigated and, if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition;
- make all employees aware of their personal responsibilities and adhere strictly and at all times to this policy;
- provide information to all employees and further guidance if they have any question or uncertainty regarding these requirements;
- provide information to all employees on the procedures available to them to report any breach or suspected breach of this policy, in accordance with the Group's policy on The Requirement for Written Codes of Ethics for employees (incorporating) Whistleblower Protection;
- include in agreements with third parties, in connection with international ventures or projects, appropriate clauses to ensure that persons who are acting on MetaCompliance 's behalf do not engage in any illegal, improper or questionable conduct, particularly if there are factors that might increase the risk of breach of this policy, such as accepted custom and practice within the country of operation;
- prohibit employees or persons and entities acting on behalf of MetaCompliance to receive, offer, promise, improperly influence payment, authorise payments or

I Have Read and Understood

**Success Notice**  
Policy completed successfully.

Related Items

- 2. Test Process.docx  
Testing Process
- Raising Bugs.docx  
The process behind raising bugs.

# Questions?