

# Compliance Program Challenges & Solutions Deminar Series

NAVEX's top leaders address best practices  
and solutions for your biggest challenges



# Program Performance & Impact Measurement



# Presenters



**Carrie  
Penman**  
Chief Risk and  
Compliance Officer  
NAVEX



**Caleb  
Willis**  
Solutions  
Engineer  
NAVEX

# Agenda

- Overview & NAVEX Philosophy
- Program Performance – Investigations
- Solution Demonstration
- Root Cause Analysis and Impact Measurement
- Solution Demonstration
- Questions



# Evaluation of Corporate Compliance Programs – DOJ Guidance 2020 – 3 Questions

1. “Is the corporation’s compliance program well designed?”
2. “Is the program being applied earnestly and in good faith?” In other words, is the program adequately resourced and

**3. *“Does the corporation’s compliance program work” in practice?***

*i.e., Program Performance and Impact Measurement*

# Program Performance: Investigations of Misconduct

## Focus on Investigations of Misconduct

- "...mechanism for the timely and thorough investigations of any allegations or suspicions of misconduct by the company, its employees, or agents.
- an effective investigation structure will also have an established means of documenting the company's response, including any disciplinary or remediation measures taken"

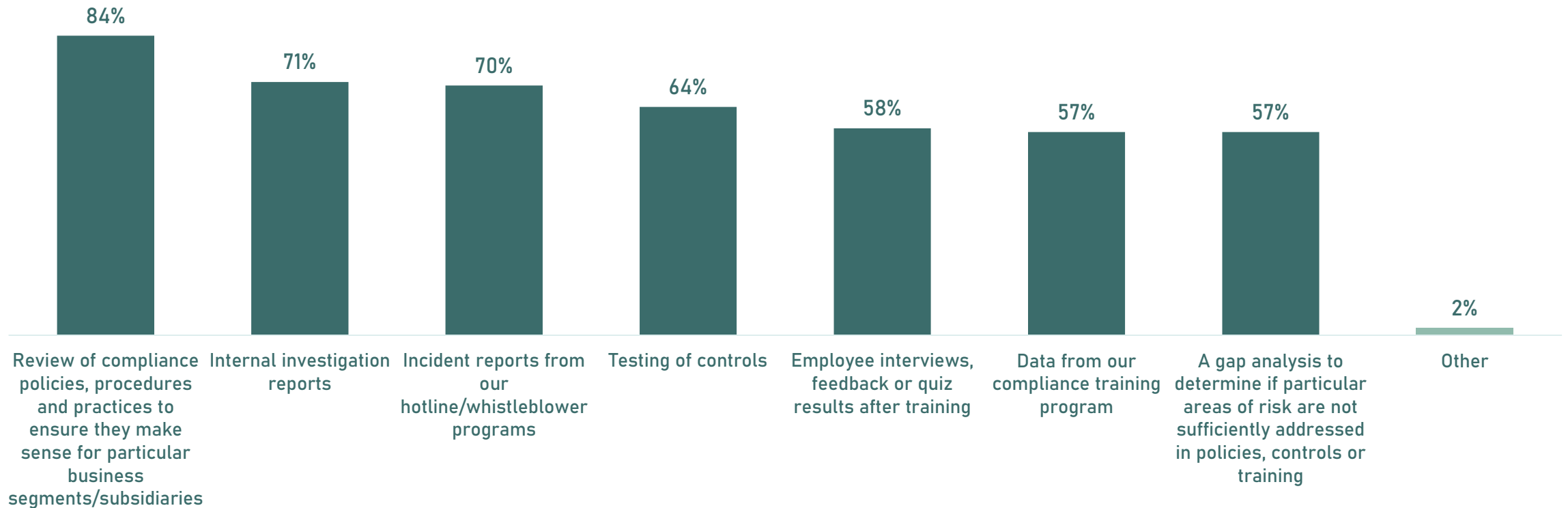
# Let's See This In Action- Focus on Investigations of Misconduct

# Root Cause Analysis and Impact Measurement

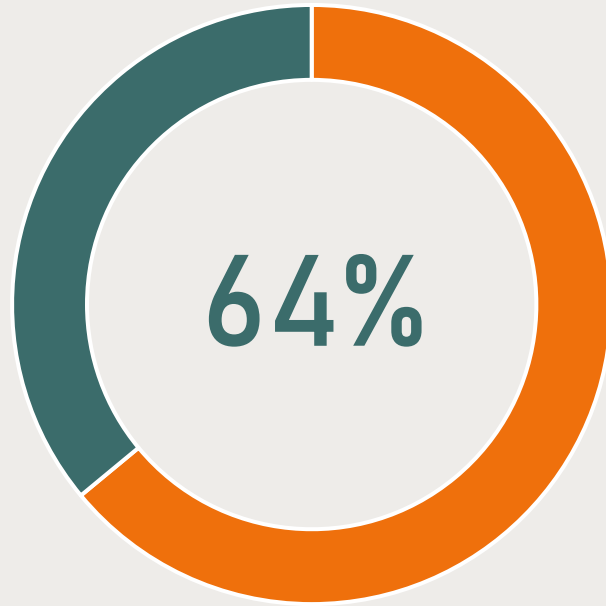
Is the incident with Jody a "one-off" or a symptom of a bigger problem?



# Organizations Measure Impact in a Variety of Ways



# NAVEX Survey Results: Only 64% use lessons learned



Percent of respondents reporting using lessons learned from misconduct (own and/or peers) to review, test and improve risk and compliance programs.

Let's See This In Action-

Root Cause Analysis and  
Impact Measurement

# NAVEX Risk and Compliance Survey Findings: Hotline & Incident Management

- One-quarter of organizations lack a hotline or non-retaliation rule
- Respondents rate themselves highly in terms of hotline and incident management but are least confident in using metrics to ensure responsiveness
- Case complexity and resource restraints have the biggest impact on case closure times
- Over 40% of respondents believe disciplinary actions aren't consistently applied across their organization

# Benefits of Program Performance and Impact Measurement

- Information is all in one place to begin an investigation
- All data related to the outcome/actions of the investigation is in a central, secure repository for trend analysis
- You can identify and track root cause analysis
- You can identify and track outcomes and actions taken; ensure consistency of discipline
- To understand program impact, you can evaluate the big picture

# Wrap Up

In just a moment, we'll take a few questions.

Please let us know how we can help you find the right solutions for your ethics and compliance initiatives.

If you would like to speak with a NAVEX One solution expert one-on-one to discuss your program, please complete our closing survey and we'll be in touch soon.

While we have the survey up for you, let's take some questions.....

# Questions?



Join our next session tomorrow at  
10 AM Pacific, 1 PM Eastern...

# Striving to Excel Ethically: NAVEX Executive Roundtable

*One hour, qualifies for certificate of attendance*

Hosted by our NAVEX CEO, Chief Risk & Compliance Officer, Chief  
People Officer, Chief Product Officer, General Counsel



Thank  
you.

NAVEX™

