

Use Case

Ethics and Compliance Program Performance & Impact Assessment

Monitor and measure your E&C program's impact on workplace culture















The Challenge

DOJ guidance measures the impact and performance of an ethics and compliance program from the perspective of three questions. Is the program well designed, is it being applied earnestly in good faith, and is it adequately resourced and empowered to function? To be ready to answer these questions your organization needs to know how well your ethics and compliance (E&C) program is being implemented and if it is structured to have a positive impact on your workplace culture. Part of this means knowing if your policies are current, reinforcing key learnings with impactful compliance training, and making sure your employees are reading and attesting to documents. It also means having all the information you need in one place to conduct thorough investigations when incidents occur and quickly react if program changes are needed. This can be a big task if all your compliance tasks are handled in separate, disparate systems.

The Solution

The right ethics and compliance platform can holistically provide you with all the information that you need to create and maintain a compliant and impactful program. This will enable you to quickly show that your compliance program works in practice and that you have a mechanism for the timely and thorough investigation of any allegations or suspicions of misconduct. With the right E&C platform, you can review key data points like attestations from training and policies and related past incident reports, all in the same system, so you quickly see historical information on individuals or locations. This can allow for complete documentation of your responses to allegations, including any disciplinary and remediation measures taken. It also allows you to measure the impact of your program through dashboarding and root cause analysis.





NAVEX One provides the necessary tools for you to be proactive with strategic planning after seeing where your organization's risk areas are – improving workplace culture and reporting to the board.

Use cross platform data to carry out a more thorough investigation for better overall program performance

- Receive incident report. For example, a report of a manager's conflict of interest.
- Before conducting interviews for the investigation, gain an understanding of whether the manager knew the policy and had been trained on COIs.
- Run a report within the NAVEX One platform to find out all compliance tasks the manager completed; including COI training, policy, and a conflict of interest questionnaire.



Failure to complete trainings, inaccessible or out-of-date policies, and reports not being created, could ultimately lead to risk of being fined for incidents.

- Run a report to see if the manager has had any other misconduct reports.
- Interview the manager and other relevant individuals for clarification, using the data to drive the questions.



The more information you have that is easily searchable, the less digging you have to do in multiple locations, and the more substantial evidence you're going to have at your fingertips for investigations

- Collect the findings, complete a synopsis of the case, including the substantiation and any root cause analyses such as policy violations into the platform.
- Notify the relevant parties on outcomes and close the case.





Use platform dashboards to do root case analysis to monitor the programs impact on culture

From the example on the previous page, see if the COI issue reported is a one off or if conflict of interest is a bigger issue company wide or at a particular location.

Use the data that is collected across the platform, such as trainings, policies, or conflict of interest, to tell a broader story.

Run a report for any COI incident reports from the built in business intelligence tool within the NAVEX One platform.

Best practice is to regularly receive dashboards from the NAVEX One business intelligence tool for alerts of changes in the numbers of reports and the types of reports received through the hotline.

The report might show that there has been a surge in anonymous whistleblower reports around conflicts of interest, and drilling into the data we see there is a location trend.

Since the data shows the reports that around conflicts of interest are anonymous, it might mean there is a fear of retaliation, specific to a location.

Run a report to see when was the last time the anti-retaliation policy was updated and sent to the employees to attest to.

If, finding it is old, update the anti-retaliation policy and create a campaign that also includes the COI policy.

Connect data points to business units and location types to add context to the data and evaluate behaviors.

Send the campaign to all employees for attestation, and continue to monitor for any anonymous reporting and COI incident reporting trends.

A well-run ethics and compliance program requires a centralized and coordinated approach across other business units to gain a better understanding of different areas of risk. Circling back to the question- does the E&C program work in practice? When all the data needed for investigations is in one location, you have actionable information at your fingertips to quick close cases and do root cause analysis.

See how the <u>NAVEX One platform</u> make it easy to use your data to uncover issues that let you take action to improve your compliance and workplace culture.



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WWW.NAVEX.COM | info@navex.com | +1866 297 0224