

☑ 1. Written Policies and Procedures

Policies and procedures outline expectations and typically include a code of conduct or code of ethics that applies to all who are employed or interact with the company, detail of the program's operation and implementation, and provide guidance around the structure and process for dealing with compliance issues. Documentation should cover risks, self-assessments for validation and implementation, and track gaps and incidents within the IT environment.

☑ 2. Compliance Team

Assign a compliance officer at the corporate level to report directly to the CEO or the board of directors. The compliance officer may oversee a team or work with an IT services provider to ensure critical compliance initiatives are communicated throughout all operational areas of the organization.

☑ 3. Education and Training

Designing compliance training programs to educate and assess the understanding of identifying risks and following compliance guidelines for internal and external rules and regulations will help prevent corporate misconduct, fraud and reduce liability concerns in the future. Periodic random employee testing can also provide valuable insight including assessing the program's effectiveness and how well the organization understands the principles of policies, rules, and regulations over assessing employee knowledge.

☑ 4. Communication Channels

Having open communication channels and multiple ways to report instances anonymously is critical for compliance plans to be effective. Reporting channels may include hotlines, email, department manager, the legal department, human resources, or an internal automated system.

☑ 5. Internal Monitoring / Auditing System

Because modern workplace technologies evolve and new risks may be identified throughout the year, it's important to evaluate regularly to identify trends, conduct quality reviews, and determine new gaps. Monitoring compliance programs test for inconsistencies, duplication, errors, policy violations, missing approvals, incomplete data, or other possible breakdowns in internal controls. An independent and objective audit reviews the monitoring process and verifies that the desired outcome is being achieved.

☑ 6. Enforcement / Discipline Guidelines

Enforcement of the policies and procedures should not be taken lightly. They must be followed according to the plan for your compliance program to be effective. Consistent enforcement and discipline will help create an environment where compliance is adopted into the company culture.



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