



Proactive Policy & Procedure Management

Avoid Fines & Reputational Damage



So many policies...

- ▶ Operating Procedures
- ▶ Rules and regulations laid down by Regulators
- ▶ Best Practice Guidance
- ▶ Good Governance, Corporate Responsibility
- ▶ Quality Management Standards and Goals
- ▶ Health and Safety
- ▶ Corporate Manslaughter
- ▶ UK Bribery Act

So many policies...

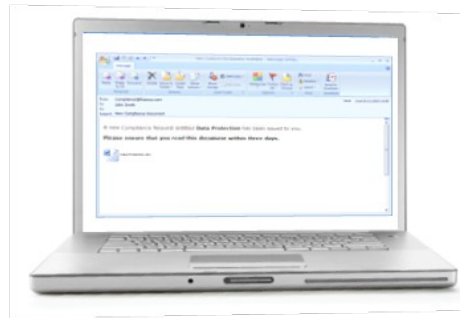
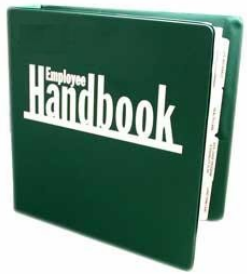


However, if you don't:

- ▶ review them regularly
- ▶ communicate them professionally
- ▶ ensure employees read them

....they are almost worthless.

Communication is key



Email



Intranet

Traditional methods of communication are no longer adequate

Communication and training programs will be the areas of greatest focus in compliance efforts over the next 12-24 months .



Source: KPMG Global Anti-Bribery & Corruption Survey 2011

The stakes are rising

The UK Bribery Act 2010 includes a new offence of “failure of commercial organisations to prevent bribery”



It is a valid defence for the organisation to prove that it had in place “adequate procedures.”

Staff must acknowledge that they have **read** and **understood** the anti-bribery code, and confirm that they will comply with it (compliance declaration);

Records are to be maintained of all members of staff who have:

- ▶ received the anti-bribery code;
- ▶ made the compliance declaration; and
- ▶ not made such a declaration.

BS:10500

BS:10500 is the Standard against which many organisations will be audited.



Non-compliance comes at a price



Willis **£6.895m**
FSA Fine

Diagio **\$16m**
SEC penalty

Macmillan **£11.3m**
SFO Fine

Johnson & Johnson **\$70m**
corruption settlement

Proactive Policy Management



It is no longer acceptable to just have a well written policy in place

Proactive Policy Management

To prove compliance organisations must ensure that all stakeholders have :

- 1 Received the latest version of the policy
- 2 Read it
- 3 Understood it
- 4 Signed up to it / not - and
- 5 That management have a full audit trail

Communication and reporting have never been more important.

Value of a Policy Management System



Manage every step of your policy lifecycle in a central place

Effectively communicate essential policies to your staff in any location

Avoid duplication and versioning issues

Give the reporting you need – when you need it

Demonstrate best practice and rigorous governance

Increase operational efficiency and cut the cost of compliance

A Complete Policy Management Solution



- ▶ ensures the key policies and procedures get to the right people
- ▶ that their knowledge is assessed
- ▶ they become accountable by signing up to them
- ▶ that the entire process is recorded and auditable

Step 1:
Create, import, amend
Policies

Step 2:
Internal review process

Step 3:
Publish the right policies
to the right people

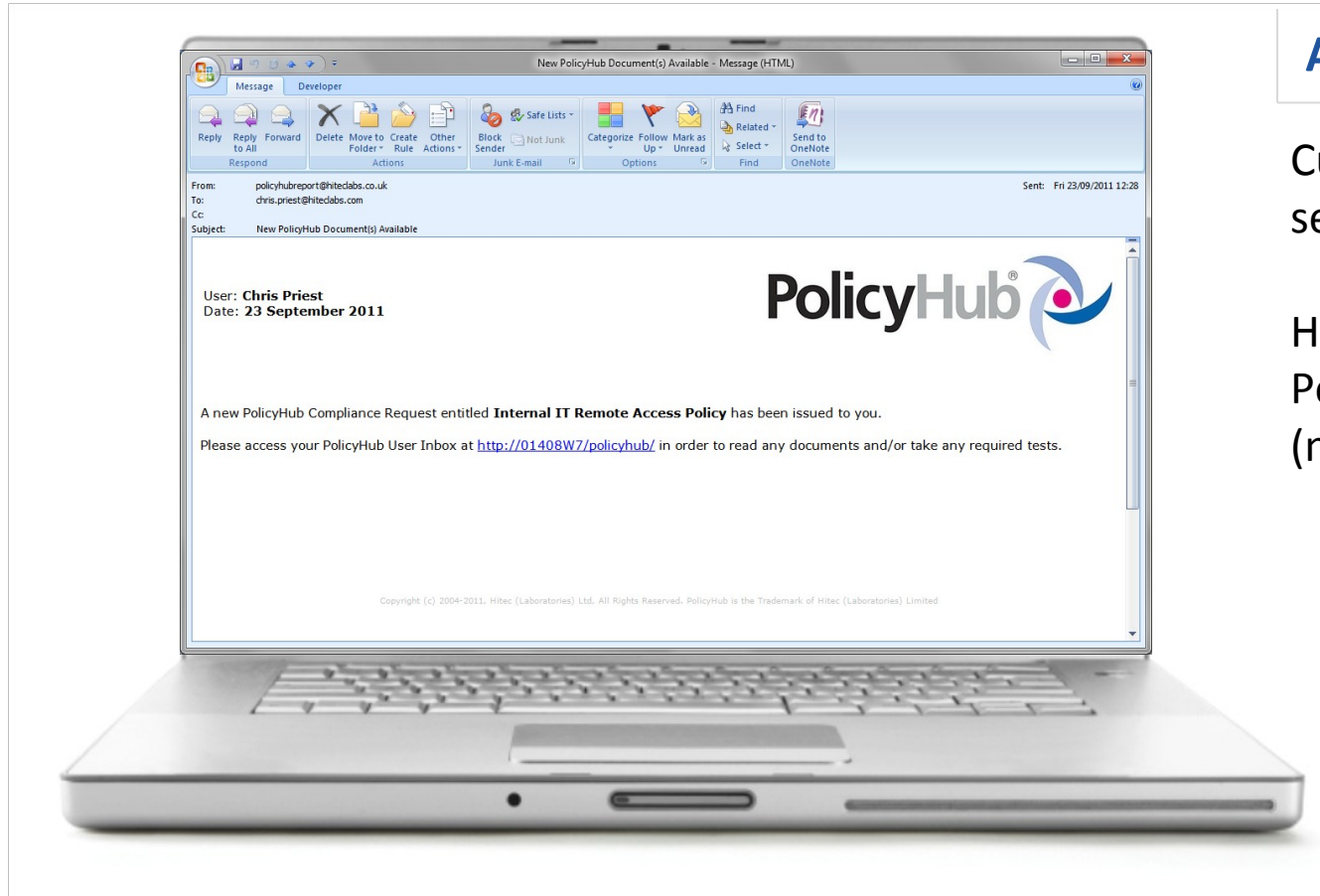
Step 4:
Employee affirmation
for key policies

Step 6:
Audit every action
and in-action

Step 5:
Ensure understanding
of key policies



Notification



Automated Email

Customisable email
sent to Users

Hyperlink to personal
PolicyHub Inbox
(no attachments)

Inbox

My Inbox (4)

My Library

Welcome to PolicyHub

Below you will find a list of items which have been sent to you. Items which were sent together are displayed in groups. Please read and confirm any documents, take any tests and complete any questionnaires in the list below by clicking on the buttons on the right.

Internal IT Remote Access Policy		Date due : 30/09/2011 12:27:56			
 Name Internal IT Remote Access Policy	Description Internal IT Remote Access Policy	Version 1.00	 View Document		
Annual leave policy		Date due : 30/09/2011 11:54:04			
 Name Annual leave policy	Description Annual leave policy	Version 1.00	 View Document		
Security of Customer Data and Company Equipment		Date due : 30/09/2011 11:53:42			
 Name Customer data and security procedures	Description Security of Customer Data and Company Equipment	Version 1.00	 View Document		
Fire Safety Procedures		Date due : 30/09/2011 12:29:47			
 Name Fire Safety Procedures	Description Fire Safety Procedures	Version 1.00	 View Document		
 Name Fire Safety Test	Description Fire Safety Test	Version 1.00	Attempts 0	Attempts remaining 3	 Take Test



Help



Close


Library

My Library Chris Priest

Page Safety Tools

My Inbox (4) My Library

Search Document Library



















Search by text 



Search selected folder only

[Advanced Search Options](#)

PolicyHub Documents Library

- Documents
 - Expenses
 - Office
- Policies
 - Data
 - Guidelines
 - Compliance**
 - Remote Access
 - Safety
 - Travel
- Sales
- Tests
- [Search Results](#)

Document name	Description	
 Compliance Introduction	 Compliance Introduction	
 KYC Introduction	 KYC Introduction	
 AML Procedures	 AML Procedures	
 Money Transfers	 Money Transfers	
 New Client On-Boarding	 New Client On-Boarding	
 Passport Checking	 Passport Checking	

 **Help**  **Close**

Knowledge Assessment



Anti Money Laundering



Your test has been submitted.

Score achieved : 33%

You have failed the test.



Close

Time Remaining : 00:01:00

Extra Time : 00:00:00

Knowledge Assessment

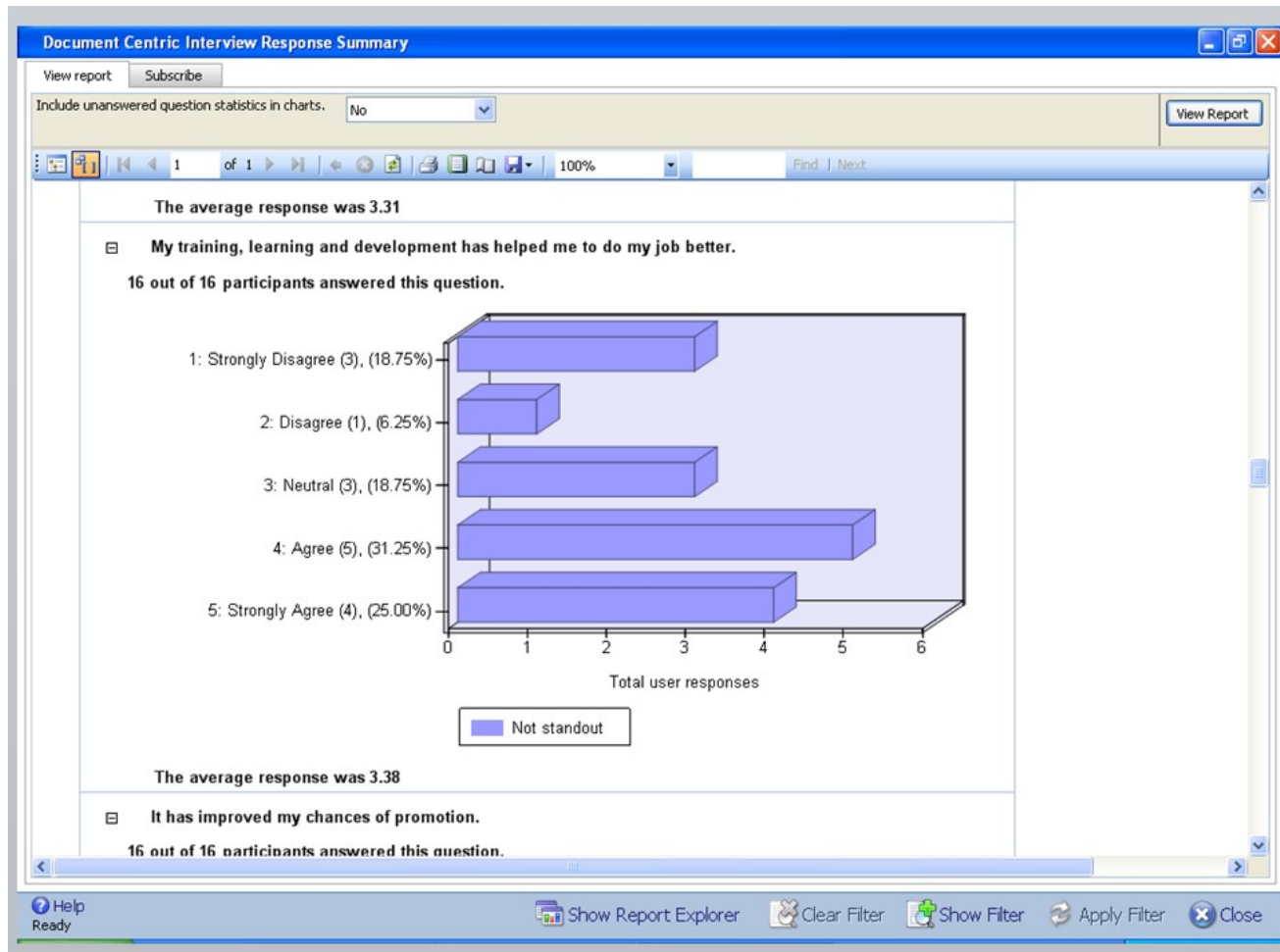
When more than just acceptance of a key policy is required

Integrated and flexible test & questionnaire functionality

Reporting – MIS

Reporting

The ability to see both test and questionnaire results is imperative



Key Features



Communication

Ensures staff read, understand and sign up to key policies and procedures via a clear presentation of information

Accessibility

Provides instant 24/7 browser based access to only the latest version of the document within personal library

Compliance

Provides detailed audit trails and management reporting on policy agreement and understanding, identifies those who have and not complied

Demonstrate Good Governance > Avoid Fines & Reputational Damage

Who benefits?



- ▶ **Employees**

- ▶ Better Employee engagement

- ▶ **HR Management**

- ▶ Increased control and visibility

- ▶ **Compliance, Audit & Security Managers**

- ▶ End to end Policy Lifecycle Management

- ▶ **The Board**

- ▶ Clear, demonstrable evidence of good Governance

Key Benefits



- ▶ Reduce risk of reputational damage and regulatory fines
- ▶ Demonstrate best practice and rigorous corporate governance
- ▶ Avoid compliance/security breaches arising from lack of policy awareness
- ▶ Improved control and visibility
- ▶ Respond quickly to regulatory changes
- ▶ Identify and address knowledge gaps
- ▶ Increase operational efficiencies

A Complete Policy Management Solution



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Hitec Expertise



- ▶ Specialise in the development, implementation and support of Enterprise Content, Risk and Compliance management solutions
- ▶ Over 550 customers in more than 40 Countries



THE BANK OF ENGLAND



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