Theory vs
Reality in your
Policies and
Procedures the Dangers of
Aspirational
Compliance

- Janet Himmelreich, Managing Director, 3Comply
- SCCE Philadelphia Conference, Dec. 6, 2019

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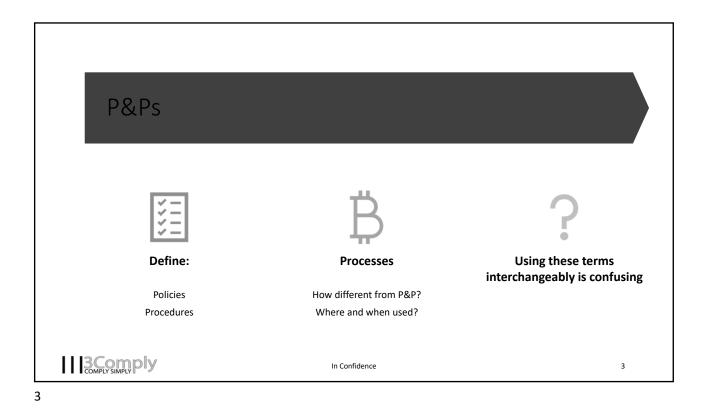
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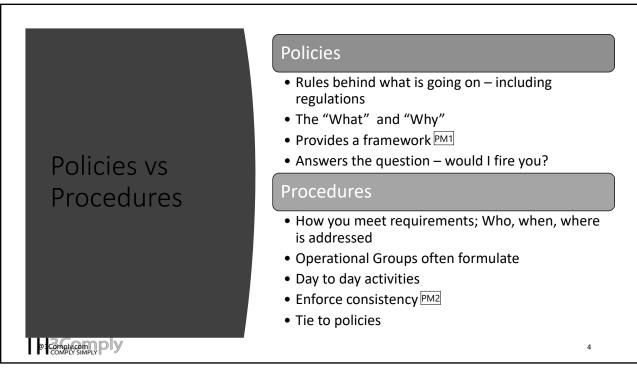
Discussion Items

- Policy vs. Procedures
- Other Types of Documents
- Do You Practice Aspirational Compliance?
- What Is Aspirational Compliance Anyway?
- Case Study
- Things You Can Do Back At the Office



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Slide 4

PM1 and a discipline

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PM2 Create visibility and
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- Guidelines
- Playbooks
- Work Instructions
- Processes
- Strategy

Other Types of Documents

- Plans
- Assessments
- "documents" may be inside an automated process; solely kept electronically etc.
 - Advantages
 - Disadvantages



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Do You Practice Aspirational Compliance?

Considerations

- Items that reside in policies and procedures (and perhaps elsewhere) that are things that:
 - Someone thinks should be done
 - Someone wants to be done
 - Someone *heard* should be done or would be happening "soon"
 - Someone believes IS the way it is being done
- Who wrote the P&Ps?
- Have you had a recent change in leadership? Change in strategy? Has a new law come into effect? Were you or a competitor or sister company fined for something?

So, do you practice aspirational compliance?



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P&Ps and Aspirational Compliance

- Case study
 - Background: company has a handful of HR related policies, automated processes reflected in systems used for business (not written separately) and a very long "Security Policy" that mixes policy statements, tasks and steps as well as processes and procedures
 - · A review of the Security Policy reveals:
 - Statements regarding the position the company takes relative to security of customer data, employee data and Privacy in general
 - · How to reset a password
 - Steps to request and receive an exception to the policy
 - The values the company is protecting by having the policy
 - · Technical security solutions today and planned
 - Directions as to how to make determinations of classifications of risk including things planned



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Dissection of study



What problems do you see?



How would you approach revisions?

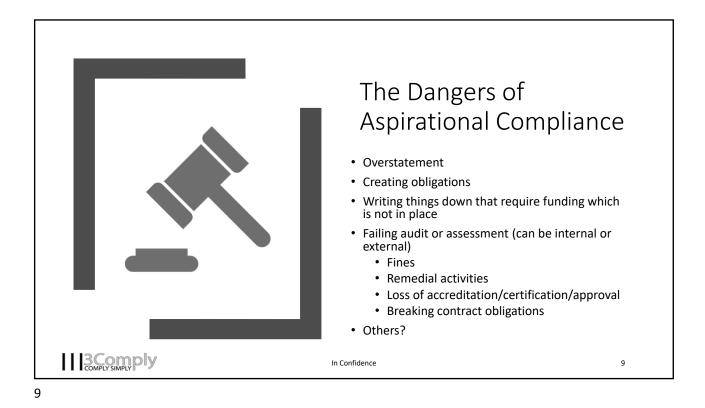


What might contain aspects of aspirational compliance?



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When were documents last Check who the reviewed? Is that author(s) were record up to date? Including in systems. Back at the Were documents that should have How do you classify office been retired actually documents? retired? Look for things If templates were written down used, were they you don't or appropriate for the can't do content? 3Comply SIMPLY Ply In Confidence 10

The \$64k question...

If you were audited against your policies and procedures would you be able to evidence that you follow them (precisely)??

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About 3Comply

3Comply believes that most people hate compliance because it is too complicated, expensive, and threatening. We believe that you can "Comply Simply". We bring a collective 70+ years of compliance experience to guide our clients in the best ways to integrate compliance into normal business operations.

3Comply is a principal owned and managed Compliance Advisory Services firm. Our services are built around Regulatory Compliance, Privacy and Cybersecurity Governance.

From multinationals to startups, we can help you establish the right level of compliance program to "Comply Simply".

Check us out at www.3Comply.com

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