TRUTH OR DARE:
CAN YOU PROVE COMPLIANCE?

Insert Presenter Name

AGENDA

Drivers

Describe the Framework

Review Controls

Implementation Advice

- Oversight & Delivery
- Measures of Success
- Plans for Improvement

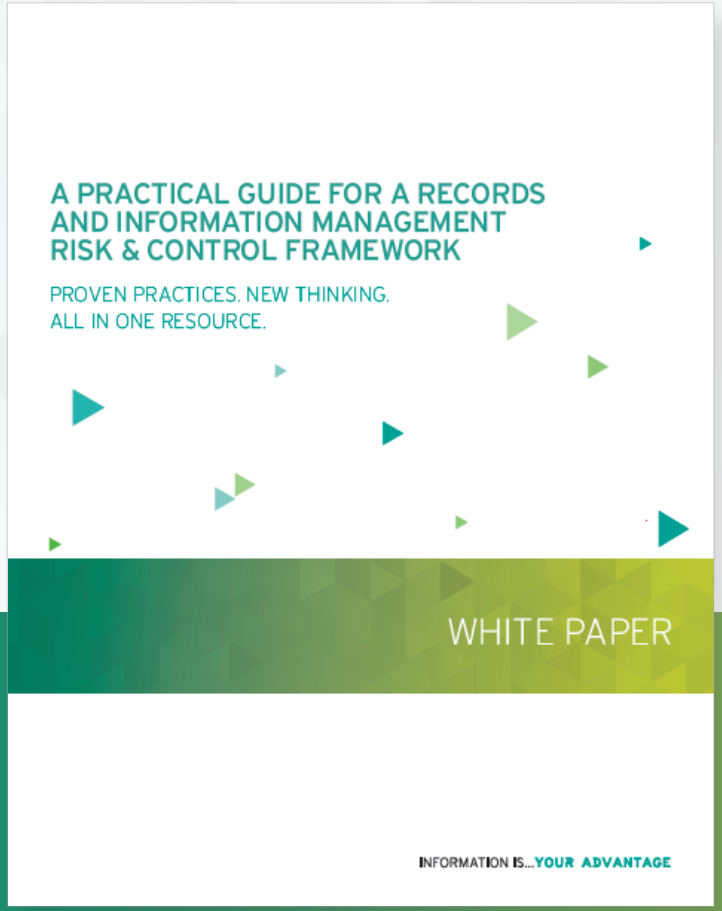
Your Compass for Action


Have you
experienced
THE GAP?


There’s you… and your team


CHALLENGES
Multiple business units, geographies, regulatory & operational requirements…
and all of this!

THE RIM RISK FRAMEWORK



A PRACTICAL GUIDE

Risk & Control Framework

Establish an operational self-assessment program

1 Institutionalize a consistent protocol for all to use

2 Allow business managers to diagnose their performance

3 Identify and address weaknesses in RIM processes

4 Provide evidence of compliance to authorities

Functions

RIM

Risk + Control

TRAINING	GOVERNANCE	INVENTORY
STAFFING	RETENTION	DISPOSITION
VENDOR MANAGEMENT	PRIVACY & SECURITY	LEGAL HOLDS

Establish a consistent rating scale for all controls

COMMUNICATE

Purpose & Process

DISPOSITION

CONTROL	DESCRIPTION	SUPPORTING INFO	RATING
Secure Destruction of Eligible Records	Records eligible for destruction are securely disposed of in accordance with RIM Policy and Information Security protocols.	Roles and responsibilities of the secure disposition process are clearly defined and communicated in policy and procedure. Electronic data or physical record secure destruction standards are upheld consistently and audited.	1 All eligible records are disposed of routinely and securely. The process is documented and regularly audited. 2 Eligible records are disposed of securely, but the process is not audited or discrepancies have been found in the process. 3 Some, but not all, eligible records are securely destroyed or there is no confirmation in writing of the secure destruction. 4 Records are not disposed of in a secure manner.

INVENTORY

CONTROL	DESCRIPTION	SUPPORTING INFO	RATING
Line of Business (LOB) Records Indexing	Taking guidance from the RIM team, each LOB must develop a records index in sufficient detail as to fully support Legal Hold, e-Discovery, and records retrieval processes for paper and electronic content. This indexing includes the appropriate records classification and storage location for each identified record.	LOB indexing reflects the use of the appropriate record code/record class from the company retention schedule. Indexing provides sufficient supporting information so as to be able to consistently retrieve records in a timely fashion when needed, place Legal Holds on material responsive to Hold Notices, or for e-Discovery purposes. .	1 LOB maintains complete and accurate indexing of all records & can respond to Legal Hold notices, or requests to produce information, in a timely and efficient manner. Performs self-audit at least annually to reconcile vendor indexing with LOB indexing of physical records. Changes made to Schedules are updated accordingly. 2 LOB maintains an index of records but it is not fully complete, accurate or updated periodically to reflect changes to the Schedule. 3 LOB maintains some indexing, but it does not capture all of the electronic and physical records. It may be largely focused on physical records, and does not reflect the requirements of the current Schedule. 4 LOB does not maintain any index other than what is in physical records vendor tracking inventories and/or data maps.

IMPLEMENTATION

Your Involvement

- Initiate & collaborate in selection of controls
- Provide input into collection method
- Communicate purpose & practice to lines of business
- Conduct a pilot

Oversight

Establish a formal process for review and maintenance

ANNUALLY

- Identify new risks, add or modify controls
- Confirm applicability of current controls, edit as required
- Review input from LOBs re ease of use, rating system, etc.
- Make appropriate changes to process & communicate to LOBs
- Monitor methodology
- Engage any new stakeholders

QUARTERLY

- Assess how controls are functioning
- Recommend changes to oversight team & communicate to LOBs

CONTINUOUSLY

- Identify gaps in Framework design & execution
- Receive input from LOBs
- Recommend changes, as required

Method of delivery

Provide evidence of submission

USE TECHNOLOGY

- Survey tool
- Dashboards

OTHER OPTIONS

- Excel Spreadsheets
- Word or PDF forms
- In-Person interviews

Roles and responsibilities

RIM
Oversees program

LOB
Establishes Risk Awareness

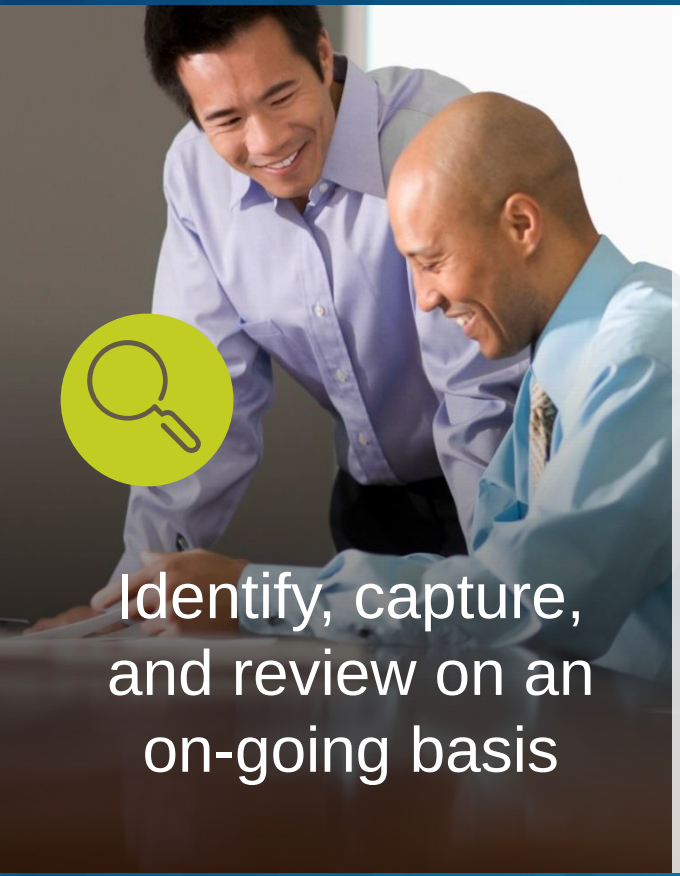
Risk
Protect brand, finances, and operations

IT
Proper protection of data

Legal
Risk profile and litigation exposure

Compliance
Ensures requirements are met

Measures of success



- Improved LOB ratings year-over-year
- KPI & KRI improvements
- Increased employee awareness of RIM policy and requirements
- Lack of regulatory criticism
- Improved audit results
- Avoidance of damage to your brand

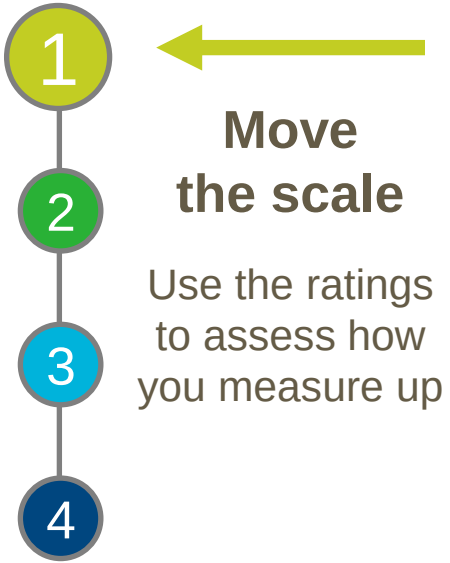
Action plan for improvement

Which risks pose the greatest threat
to your organization and which controls must be enhanced immediately to close off gaps?

What is the cost/benefit ratio
for the enhancements?

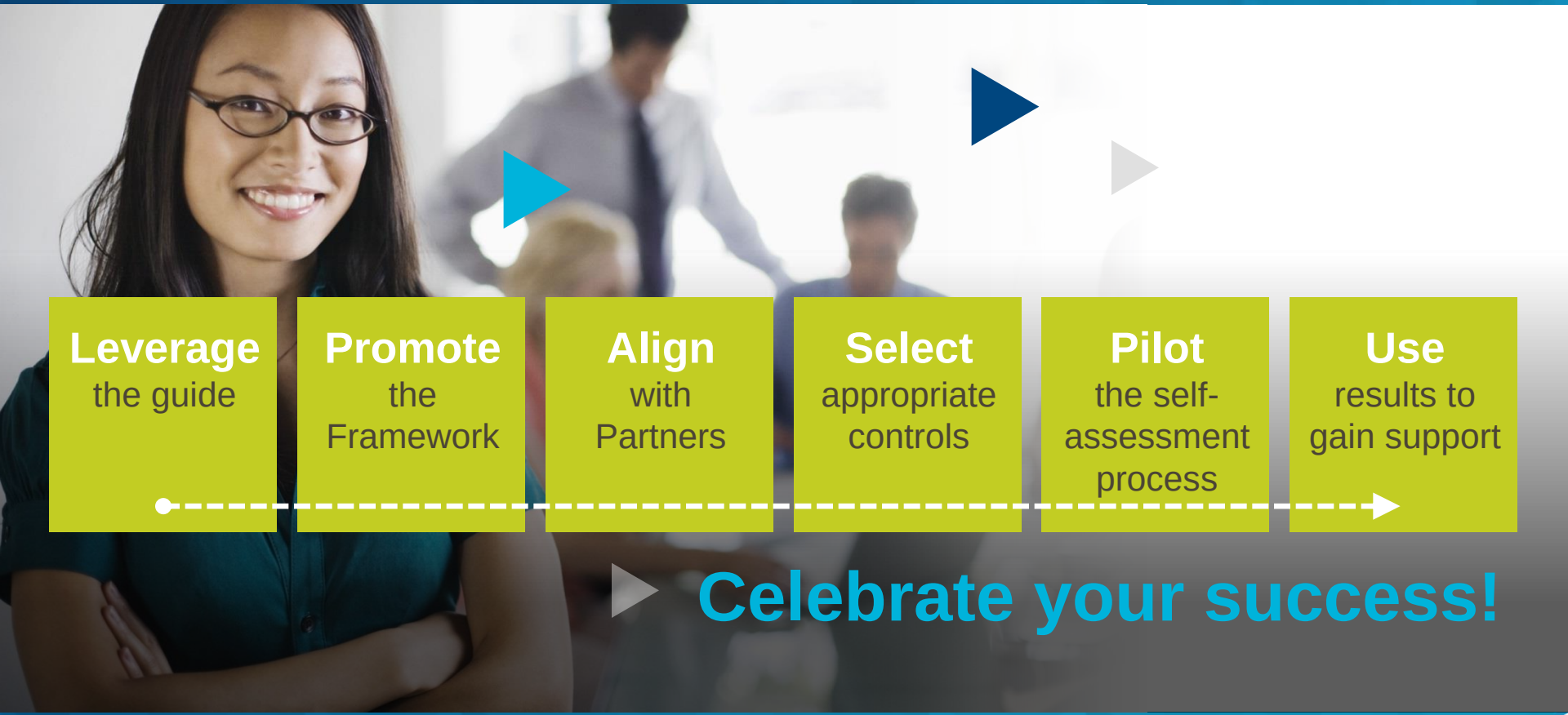
What resources are required
to enhance the controls?

Can the RIM team alone institute changes
to enhance the controls, or is a partnership with another functional area required?



ACTION ITEMS

Your Compass



Leverage the guide

Promote the Framework

Align with Partners

Select appropriate controls

Pilot the self-assessment process

Use results to gain support

Celebrate your success!

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