



# POLICY MANAGEMENT MATURITY ASSESSMENT

## Prepared for:

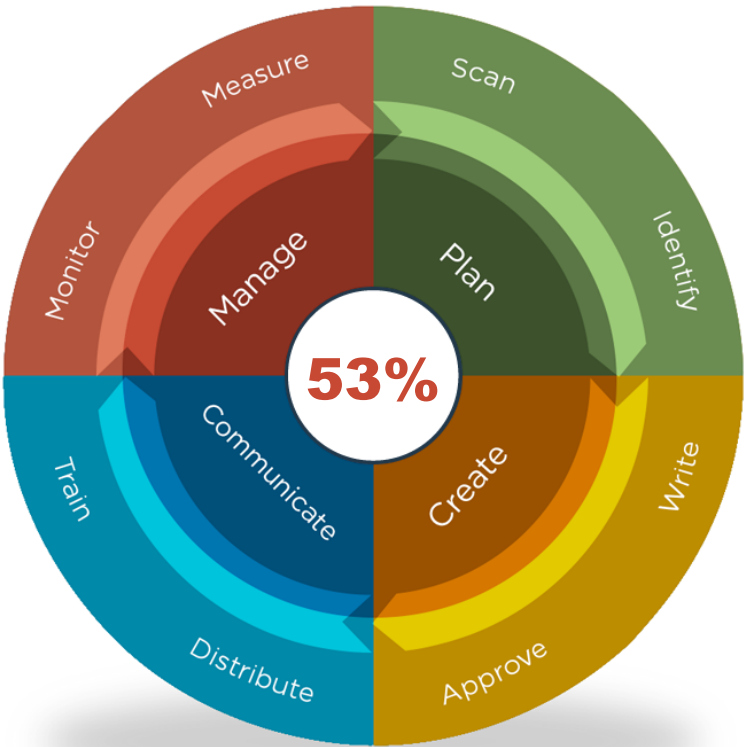
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POWERED BY

INFO~TECH  
RESEARCH GROUP



INSIGHT OVERVIEW



POLICY MANAGEMENT SUCCESS

"To what extent do you agree with the following statements?"

Our policies adhere to relevant regulatory requirements and reflect our desired corporate culture.

20%

Our user population fully understands the content of the policies in place as well as the rationale for them.

20%

Our user population fully adheres to the policies in place.

100%

**Insight:** Your organization is at risk of being issued a sanction by one or more regulatory bodies! Interview the compliance experts within your organization and identify the areas of potential non-compliance. Analyze the probability and impact of a sanction and where necessary implement the appropriate policies.

**Insight:** Identify the poorly understood policies, review them for clarity and simplify any ambiguous or unclear wording. Hold mandatory training sessions that emphasize both the content of the policy as well as the rationale.

**Insight:** Continue to monitor policy compliance and be sure to vary the testing frequency and sample group to avoid becoming predictable.

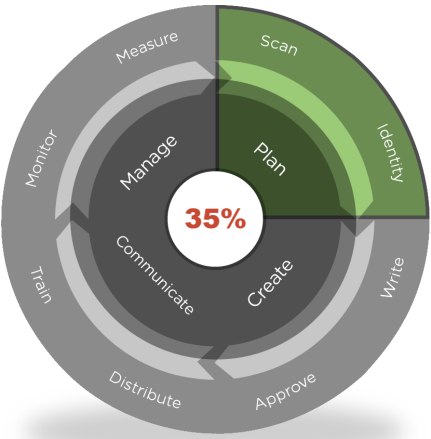
TOOLS

The sophistication of policy management tools needs to correspond to the size and complexity of the policy portfolio being managed.

Tools In Use:

 Enterprise Content Management System

**Insight:** Based on your organization's average policy management maturity score, you should consider investing in a formal policy management tool to improve policy process efficiency and effectiveness.



SCAN

The process of monitoring new legislation, regulatory changes, competitive forces, technological advances as well as organizational changes to determine if existing policies need to be updated or new policies need to be created



Risk Environment Scan

- To what extent does my organization have a process in place to monitor changes in the regulatory and risk environment as it pertains to policies?
- Given that the primary function of policies is to mitigate organizational risk, it is imperative that the organization's risk landscape is monitored and incorporated into the policy planning process.



**Recommended Action:** By not formally monitoring your organization's risk landscape your organization is left exposed to unnecessary risk. Establish a cross-functional group dedicated to scanning the legal, regulatory and business environment for relevant risks.

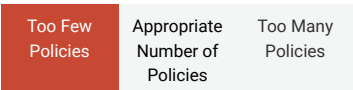
IDENTIFY

The process of determining which policies your organization will create



Policy Volume

- Which statement best describes the number of policies my organization has in place?
- It is important an organization establish an appropriate number of policies that finds the right balance of operational efficiency and an adequate level of internal control.



**Recommended Action:** Having insufficient policies to adequately address the risks faced by your organization exposes it to regulatory sanctions and legal issues. Identify the most significant risks faced by your organization and if a policy is appropriate, create a one to mitigate it.

Proactive vs. Reactive

- To what extent are my organization's policies created in a proactive manner?
- A reactive approach to policy management will lead to a hodgepodge of policies that do not adequately mitigate the risks of the organization.



**Recommended Action:** Waiting until a major incident occurs before taking action is not a sustainable practice in the long-term. Update your existing policies where inadequately detailed and actively monitor external and internal forces and determine if existing policies need to be modified or new policies need to be created.

POLICY MANAGEMENT SUCCESS

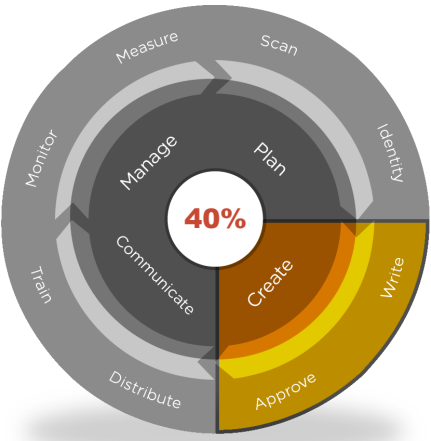
The **risk tolerance** of an organization will determine how robust its policy portfolio should be.

For major regulatory obligations appoint a **subject matter expert** in the organization to stay abreast of any changes and route the relevant information to the appropriate policy owner(s). The policy owner(s) must then determine what impact, if any, the information has on their policy and act accordingly.

**Not all risks** are best mitigated with a policy. For example, if an organization wants to prevent employees from entering a specific area of a building, it could create a policy outlining the restricted areas; however, installing locks at the entrance of these areas could be more effective.

HOW MYPOLICIES HELPS

**Policy Needs Identification Workshop**  
Find the right mix of policies for your organization. Every organization's policy needs are unique and vary based on its regulatory environment, risk landscape and culture. Don't overwhelm employees with too many policies or leave the organization unnecessarily exposed to risk by having too few. Our Policy Risk Mapping framework will produce a lean list of policies to mitigate the most significant risks facing your organization.



WRITE

The process of authoring policies



Appointed Authors

- To what extent does my organization have appointed authors with policy drafting expertise?
- Having formally appointed policy authors will ensure policies are both legally tenable as well as easily understood by employees.



**Recommended Action:** Ensure all future policies are written by authors with proper expertise and expand the number of qualified authors by having your strongest policy authors train others.

Policy Consistency

- To what extent do my organization's policies all follow a similar writing style as well as deliver a consistent message to the user population?
- A policy created in isolation could clash with existing policies and confuse employees.



**Recommended Action:** Start centrally managing the policy program. Establish a standard process for writing policies to ensure all authors are consistent with one another.

Policy Attributes

- To what extent does my organization's policies a follow a similar set of headings, formatting style and capture the necessary document attributes?
- Policies should have a consistent look and feel to ensure it information can be easily digested by employees.



**Recommended Action:** Establish a standard template for creating new policies that outlines all of the required components. Dedicate time to retrofit existing policies in the new standard format.

APPROVE

The process of senior management reviewing and signing-off on a policy before it goes into affect



Senior Management Approval

- To what extent does my organization have a process for obtaining and documenting policy approval from senior management?
- All policies should go through the same review and approval process before being published to ensure consistency and establish credibility with the user population and auditors.



**Recommended Action:** Auditors must be able to verify that policies were approved by senior managers. Determine which executive should be reviewing policies and establish a formal process to obtain and document policy approval.

POLICY MANAGEMENT SUCCESS

BE CLEAR

- Use everyday language and avoid jargon.
- Use active verb tense to direct behavior.
- Keep the document short.
- Clearly define objectives and key terms.
- Do not house policies and procedures in the same document.
- Note any policy exceptions.

BE CONSISTENT

- Use standard short sentences and paragraphs.
- Keep the document structure simple.
- Use lists to summarize important information.
- Ensure policies are aligned with other organization policies.
- Avoid including specific names, roles and technologies that may date themselves easily.

ENSURE COMPLIANCE

- Monitor policies for compliance and to verify their relevance.
- Be specific and unambiguous.
- Make sure policies are realistic and enforceable.
- Clearly establish consequences.
- Manage the integrity of electronic documents.

HOW MYPOLICIES HELPS

150+ Best Practice Templates

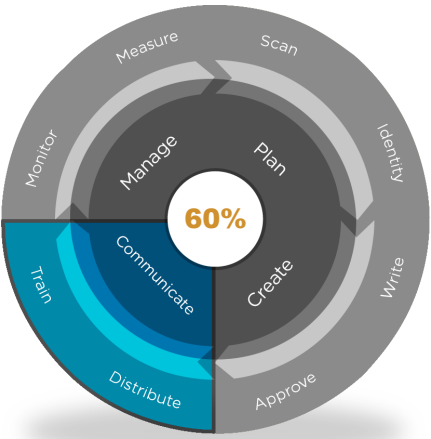
Save time with our road tested policy templates and never write another policy from scratch again.

Standardized Workflows

Make sure all policies are created according to standards by using writing and approval workflows.







DISTRIBUTE

The process of making policies available to the organization and tracking employee acknowledgements



Policy Distribution

- To what extent does my organization have a process to effectively distribute policies and track acknowledgements?
- Signed acknowledgements demonstrate that an employee has not only received the policy, but is also responsible for knowing the information contained within.



**Recommended Action:** Don't assume your employees will proactively search for policies. Develop a distribution process that is both engaging and unavoidable for employees and create a central repository to store policies.

Central Repository

- To what extent does my organization store the most recent version of policies in a centralized repository?
- Multiple versions of policies being stored across multiple locations will confuse employees and diminish their credibility.



**Recommended Action:** Maintain your central repository and prevent policy silos from forming across the organization. Be sure to archive historical versions of the policy for audit purposes. Periodically remind employees about the central repository to raise awareness.

TRAIN

The process of educating employees about policies



Policy Training

- To what extent does my organization provide the user population with initial and ongoing training when a policy is implemented?
- Without proper policy training employees are left to interpret the policy for themselves or ignore it altogether.



**Recommended Action:** Solicit feedback from employees about policy awareness and education and integrate feedback into your policy training program.

POLICY MANAGEMENT SUCCESS

Before publishing a policy to employees, have **advanced communication** about the policy to managers. This will ensure managers have sufficient knowledge to answer employee questions.

Communicate policies through a **variety of channels** (meetings, newsletters, training session, etc.). Solely relying on email for policy distribution will be ineffective.

**Listen to your detractors!** Their feedback is incredibly valuable for identifying opportunities to improve policies as well as areas to improve policy training and positioning.

HOW MYPOLICIES HELPS

Automated Policy Distribution

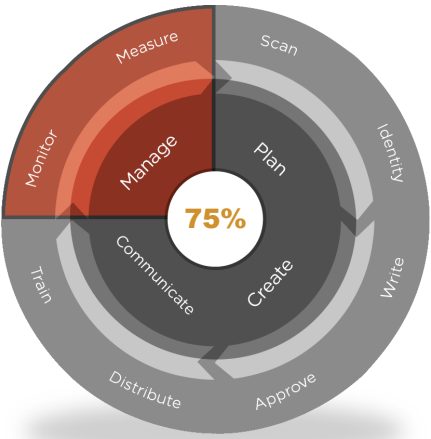
Easily assign policies to individual employees or groups for sign-off and follow up with overdue assignments.

Two-Way Communication

myPolicies gives employees and policy owners the opportunity to share their feedback and respond accordingly.

Digital Sign-off

Stop chasing down and storing stacks of paper signatures and start leveraging digital sign-offs.



MONITOR

The process of observing employee behavior and enforcing policies



Compliance

- To what extent does my organization regularly perform automated or manual policy compliance checks against the user population?
- Employees will not adhere to a policy if it is not enforced.



**Recommended Action:** Train supervisors and managers to apply policies in a fair and consistent manner. Formalize your policy enforcement plan to monitor employee compliance. Focus your enforcement efforts on the policies that correspond to your organization's greatest risks.

Whistleblowing

- To what extent does my organization have a avenue for the user population to anonymously report suspected incidents of policy non-compliance?
- Encouraging employees to be honest and transparent will increase the probability of identifying and remedying incidents of non-compliance.



**Recommended Action:** Continue to encourage employees to be forthcoming about policy issues.

Policy Reviews

- To what extent are my organization's policies are up-to-date and are reviewed regularly?
- Out-of-date policies can sometimes be just as harmful as not having policies at all.



**Recommended Action:** Determine the appropriate review frequency for each policy and have policy owners periodically assess the quality and relevance of each document. Hold these individuals accountable for their policies.

MEASURE

The process of reporting on policy activity



Accountability

- To what extent does my organization have clearly defined roles and accountability for the management of its policies?
- Without clear accountability for the policy portfolio, it will go unmaintained and will ultimately be ignored across the organization.



**Recommended Action:** Formalize and document your organization's policy governance structure and ensure responsibilities are clearly defined and allocated appropriately.

Reporting

- To what extent does my organization track and report on the success of its policies?
- Having a holistic view of all policy activity is the only way to accurately identify risks as well as opportunities to improve policy training and enforcement.



**Recommended Action:** You can't manage what you don't measure. Identify the desired policy data you currently do not have access to and establish a plan to manually or automatically collect and aggregate it.

POLICY MANAGEMENT SUCCESS

When deciding on the consequences for policy violations always keep in mind the organization's top performing employees, and contemplate whether or not managers would be willing to impose the proposed mandated consequences.

Policy violations are not always intentional, they often stem from a poor understanding of policies. On first offenses make sure the focus is on education and not on punishment.

Create a set standard policy violation letter templates to decrease the effort required by managers to issue letters as well as ensure consistent messaging.

HOW MYPOLICIES HELPS

**Audit Ready Reports & Logs**  
Satisfy audit requirements with one click reporting and employee action logs.