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Compliance spring cleaning

by Gerry Zack

As winter starts to recede, thoughts turn to warmer days and the need to embark on the traditional spring cleaning. While that's usually an at-home affair, it can and should also apply to your compliance program. And while a compliance clean doesn't involve moving furniture and rolling up carpets, it does mean shaking off some of the dust.

Block some time off to look at your policies and procedures. Do any of them still refer to pagers or Blackberrys? Is there a reference to a risk area in a division that has been spun or sold off? Do new risks—such as doing business with Russia and Iran, or the latest cyberthreats—get the attention they deserve?

What about the scripting for your helpline? That's one of those things that tends to stay constant, and maybe for good reason. But, if you find that you're not getting the information you want, it may be time to refresh. And, if you do not have a web-based reporting option, now may be the time to finally add one.

Take a step back and look at the graphics you are using. If they've been around for a while, the colors may no longer be so stylish. Check out the photos you are using. If you are using stock images, make sure they look up to date, and even if they are, think about a revamp. A changed image can make a big difference and call people's attention to a long-time message.

If you are using photos of your own employees in compliance materials, make sure that they are still employees and haven't long since moved on. Nothing says "out of date" faster than a picture of Bob or Sue after they have left the company.

Then, look to the future. What's coming up on the work calendar, and what initiatives does management have planned? Is there anything that needs to be cleaned up before it starts? And maybe there's a tool or technique you should dust off again.

Some dusting here and some polishing there can go a long way toward making your compliance program more effective and relevant to your workforce as it emerges from the dark days of winter.