Scorecard

DIGITAL COMMUNICATIONS
Compliance Risk Assessment

Conduct a quick and easy self-assessment using this worksheet to identify information risks that may be present across your firm's digital communications platforms. The goal and objective are to identify areas of risk and prioritize mitigation strategies.

Use the scoring guide in each section to determine your firm's risk assessment in that area.

HISTORICAL ANALYSIS

Risk Factor	Low-1	Medium-2	High-3	Score
Previous regulatory exam/enforcement	Communications didn't contribute to enforcement topic	Communications contributed to negative outcome(s)	Communications directly cited in negative outcome(s)	
Previous e-discovery/ investigation	Communications didn't contribute to discovery topic	Communications contributed to negative outcome	Communications directly cited in negative outcome(s)	
Previous HR/code of conduct infraction	Communications didn't contribute to HR/code of conduct topic	Communications contributed to employee infraction	Communications directly cited in employee infraction	
Off-channel communications pervasiveness	Low, validated by surveys/user analysis	Present in specific business areas	Widespread and pervasive	
Methods to assess pervasiveness	Statistically relevant sampling and network analysis	Interviews/surveys within open investigations	Ad-hoc, informal	

Risk assessment

13-15: This is a high-risk area for your firm and should be prioritized
8-12: This is a medium-risk area for your firm and should be addressed
5-7: This is a low-risk area for your firm
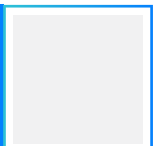
POLICIES AND PROCEDURES

Risk Factor	Low-1	Medium-2	High-3	Score
New tool evaluation	Ongoing, cross-functional process	On-demand, led by technology and business	Ad-hoc, or process not defined	
New feature evaluation	Ongoing, cross-functional process	On-demand, led by technology and business	Ad-hoc, or process not defined	
Retention policies	Up to date, reflecting all accepted channels	General policies reflecting all channels uniformly	Defined only for user defined business records	
Code of conduct	Up to date, reflecting all accepted channels	General policies reflecting all infractions uniformly	General policies primarily focused on in-person infractions	
Supervisory policies	Regularly updated policies reflecting acceptable use policies	General policies updated on ad-hoc or as-needed basis	General policies not regularly updated	
Supervisory review	Review audited as effective for remote and in-person staff	Remote review process defined on case-by-case basis	No update to review process currently defined	
Conduct surveillance	Automated inspection of all business communications	Inspection managed with tools depending on investigation	On-demand, manual inspection against infractions	
Prohibited networks	Automated inspection for use of prohibited networks	On-demand inspection for use of prohibited networks	No policy defined to investigate prohibited networks	

Risk assessment

19-24: This is a high-risk area for your firm and should be prioritized
13-18: This is a medium-risk area for your firm and should be addressed
8-13: This is a low-risk area for your firm

EMPLOYEE TRAINING

Risk Factor	Low-1	Medium-2	High-3	Score
Tool usage	Training specific to use of tools by specific functions	General training provided for select function	Training provided ad-hoc and on-demand	
Prohibition policies	Consequences for policy violations clearly defined	Prohibited policy training defined within general training	Prohibited networks not addressed within training programs	
Compliance	Employee tested and certified on applicable recordkeeping and supervisory obligations	Employee training on compliance requirements provided on demand	No formal user training for compliance requirements	
Security and privacy	Employee tested and certified on applicable security and privacy obligations	Employee training on security and privacy requirements provided on demand	No formal user training for security and privacy requirements	

Risk Factor	Low-1	Medium-2	High-3	Score
Employee attestation	Ongoing, regulatory audited attestation programs in place	Attestation program in place but not regularly audited	No formal attestation program in place	

Risk assessment

13-15: This is a high-risk area for your firm and should be prioritized
8-12: This is a medium-risk area for your firm and should be addressed
5-7: This is a low-risk area for your firm

TECHNOLOGY AND AUTOMATED CONTROLS

Risk Factor	Low-1	Medium-2	High-3	Score
Public social media (Twitter, LinkedIn, Facebook, etc.)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	
Ephemeral messaging apps (WeChat, WhatsApp, etc.)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	
Mobile device content (SMS and other device messaging content)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	
Collaboration (Microsoft Teams, Slack)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	
Email (Office365, Gmail, Bloomberg)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	
Video conferencing (Zoom, WebEx, RingCentral)	Automated capture and archive for accepted channels	Semi-automated capture and archive for select users	Channel used but not captured or archived	

Risk assessment

15-18: This is a high-risk area for your firm and should be prioritized
10-14: This is a medium-risk area for your firm and should be addressed
6-9: This is a low-risk area for your firm

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