



5x5 series: Insights and actions

Assurance by design

A controls mindset and assurance by design process can help organisations effectively manage operational and strategic risks with new business transformations or implementations. Approaching an implementation process through these assurance by design principles and insights can elevate implementation and governance framework to a controlsconscious transformation.

5 things you should know

“Controls” can mean different things to different people. There are many ways to include controls in a project, whether it’s just focusing on automated controls, evaluating full end to end risks, consideration of underlying IT General Controls, or expanding into operational, regulatory, and strategic risk areas.

True “controls readiness” can also mean different things to different people. There are many levels of assurance that can be performed over controls, whether it’s how the risk / control is documented, how the control is tested / validated, level of documentation for the final output, and even more granular considerations that only a controls specialist might understand / require.

Many companies look to identify automation opportunities during large transformations, but **truly modernizing and automating your control environment** goes beyond just identifying automation opportunities.

Identifying control owners early is equally as important as making sure you define the right controls. Not identifying control owners early enough in the process to align on the control framework and control owner operating procedures could lead to confusion, deficiencies, and or gaps in risk coverage.

Point in time identification and validation of controls may not be enough. Major implementations are fluid and the scope / design may change over time. **Controls need to be considered throughout the project lifecycle and align with the system integrators timeline for design, build, and go-live.**

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5 actions you can take

To avoid surprises or misunderstandings, controls stakeholders across the organisation need to **align on the details of risk appetite, compliance requirements, and what the scope of controls should be** for a given project.

Collaborate with control stakeholders early on and **level set expectations for how controls will be evaluated during the project, which compliance requirements must be achieved (Sarbanes-Oxley, Privacy, HIPAA, etc.)** and what specifically the output will be from the work performed.

Leverage leading practice tools and techniques to **optimise and rationalise controls** during implementations with a focus on **enhancing automation across all areas of the process and controls lifecycle**, whether it’s identifying ways to automate a process, enhancing the scope and performance of a review control, executing testing of a control, or automating continuous controls monitoring.

As controls are being identified, the control owners should also be identified to opine on the design of the control to address the risk, including the to-be procedures. Further, the control performers should be trained on how to execute the controls and practice/ test the procedures prior to go-live to confirm they have what they need and are clear on the required evidence and output of the control.

Regular reviews of the design, changes to the design, testing requirements, and testing results should be evaluated by controls specialists throughout the project. **Further, alignment with controls stakeholders on the level of involvement through the project is critical.**

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