

Governance Risk Exposure

Reducing the risk of governance exposure

What safeguards have you got in place?

Safeguarding corporate information assets has become a commercial imperative for organisations across the world as the threat of cyber crime increases and high profile malpractice cases hit the headlines. Within this context it is understandable that enterprises expend significant time and money protecting their enterprise from external attack.

It appears that in many cases there is little or no consideration given to the activities that take place inside a business. For example, there may be no safeguards on what or how much can be sent out via email from employee desktops, giving rise to potential leakage of confidential information.

Increasingly of concern within the Pharmaceutical and Life Sciences industries is the exposure to risk

compliance. Some of the most recent concerns are associated with being compliant with the US Foreign Corrupt Practices Act (FCPA). This US Federal legislation affects all US multinational pharmaceutical companies. The Act aims to deter companies from bribing government officials outside of the US.

The FCPA presents a particular problem in the UK and in Europe. As many healthcare professionals and hospital employees are government employees, they fall within the scope of the FCPA as well as national anti-corruption laws. Industry watchdogs are increasingly scanning communications between medical sales representatives and healthcare professionals on unapproved use of both approved and investigative products. Consequently, pharmaceutical companies are striving to be compliant by creating an ability to monitor such communications.



Protecting Your Information Assets

Why is this such an issue?

In December 2007 the Daily Telegraph reported ‘The SFO seized drug giants’ documents’ - “ of two large Pharmaceutical companies, these drug makers, have been ordered to hand over confidential documents to the Serious Fraud Office (SFO) as part of its investigation into bribes allegedly paid to Saddam Hussein’s deposed Iraqi regime. The report claimed investigators had uncovered evidence to suggest that the first company had paid \$162,000 (£81,000) in bribes to get three contracts worth \$2.9m, while the second company paid \$1m to win nine medicine contracts valued at \$11.9m. Both companies vehemently denied the claims at the time. Robert Wardle, the SFO director, who personally sanctioned the inquiry in February, has secured an extra

£22m from the Government to fund the investigation, which is expected to run until at least 2010.

The consequences of ignoring the internal threats are significant. The reputation of your enterprise can be compromised through negative publicity affecting share price and undermines faith in your ability to meet citizen/customer expectations as well as financially through the imposing of fines and or commercial restrictions.

A governance risk avoidance solution would also enable organisations to understand or respond to other internal threats which put key business assets at risk – data, cash, intellectual property, patents, etc. The electronic age has brought with it huge productivity benefits but, inevitably, alongside this have

come threats to our efficiency and business continuity.

Is there a solution for Life Sciences organisations?

Capgemini has developed an Internal Governance Audit Solution combining SAS® best-of-breed technology with real-world experience gained working in both government and commercial sectors. This solution facilitates the capture (Collection) of disparate data; the warehousing (Storage) of that data; and the mining (Analysis) of the data to discover and anticipate non-compliant activity. By the analysis of people’s behaviour, the Internal Governance Audit Solution is capable of proactively identifying those employees likely to be a threat to the enterprise.

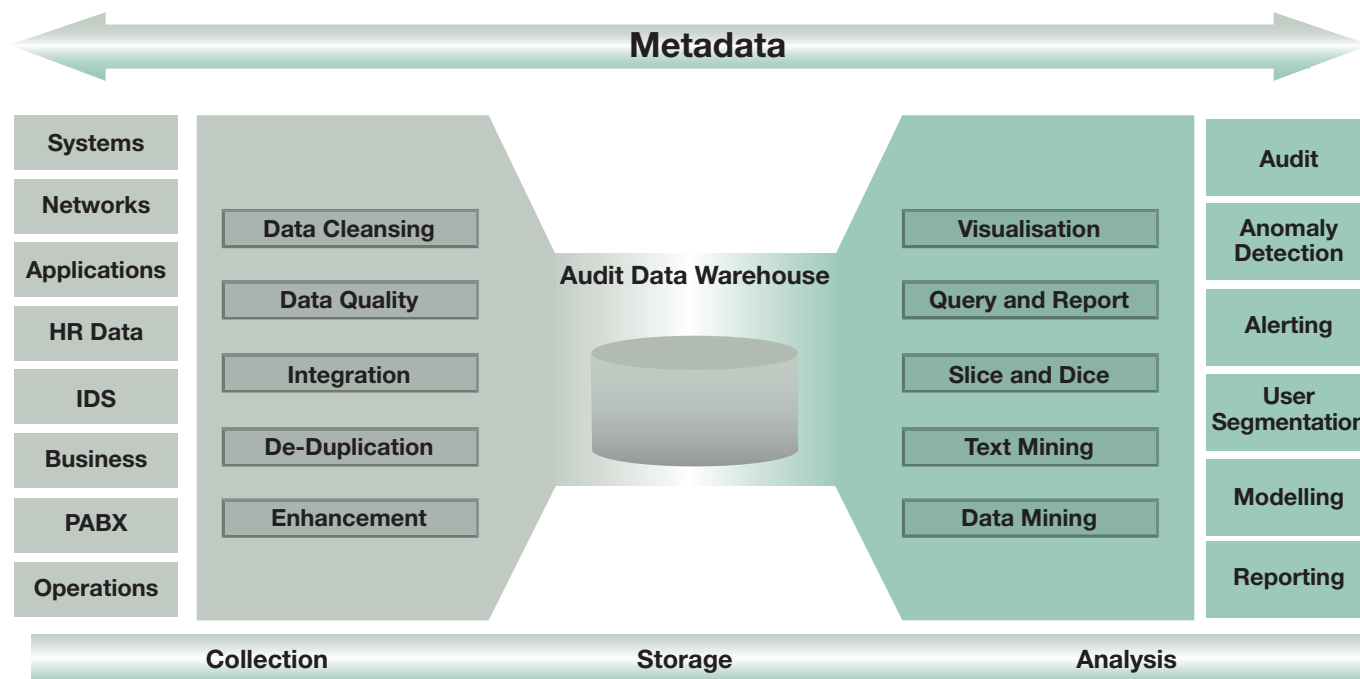


Figure 1 – Overview of the Capgemini Internal Audit Solution

Capgemini is uniquely placed to bring to bear leading subject matter expertise in the area of Internal Audit, providing insight into likely indicators of non-compliant behaviour supported by expertise in key information security standards such as BS7799 and ISO 17799.

How does it work in practice?

The solution facilitates the automated analysis of security logs from a number of different systems. It also provides the capability to analyse and capture available System Audit Data, identify anomalous behaviour and predict who is most likely to breach system policies.

As a result, there is a requirement to automate the collection, storage and analysis of disparate system logs as follows:

- The acquisition of System Audit Data from a number of platforms: including system accounting logs from clients, servers, operating systems and applications; network connections, Intrusion Detection System Sensors and, where appropriate, stand-alone systems such as door access control systems and telephone exchanges.
- The movement of data into a single Audit Data Warehouse environment, providing the following benefits:
 - secure repository
 - consistent view of all activity
 - trusted repository of validated audit data
- Perform analysis across all logs including:
 - highlighting of defined procedural events
 - identification to the auditor(s) of ‘unusual’ behaviour patterns
 - provision of a small volume of data (a Data Mart) for use by the auditor(s)
 - storage of the Data Dictionary (Metadata) that will store information about the data in terms of structure and significance
 - output analyses in the form of textual and graphical reports (for both standard and user-defined reports)

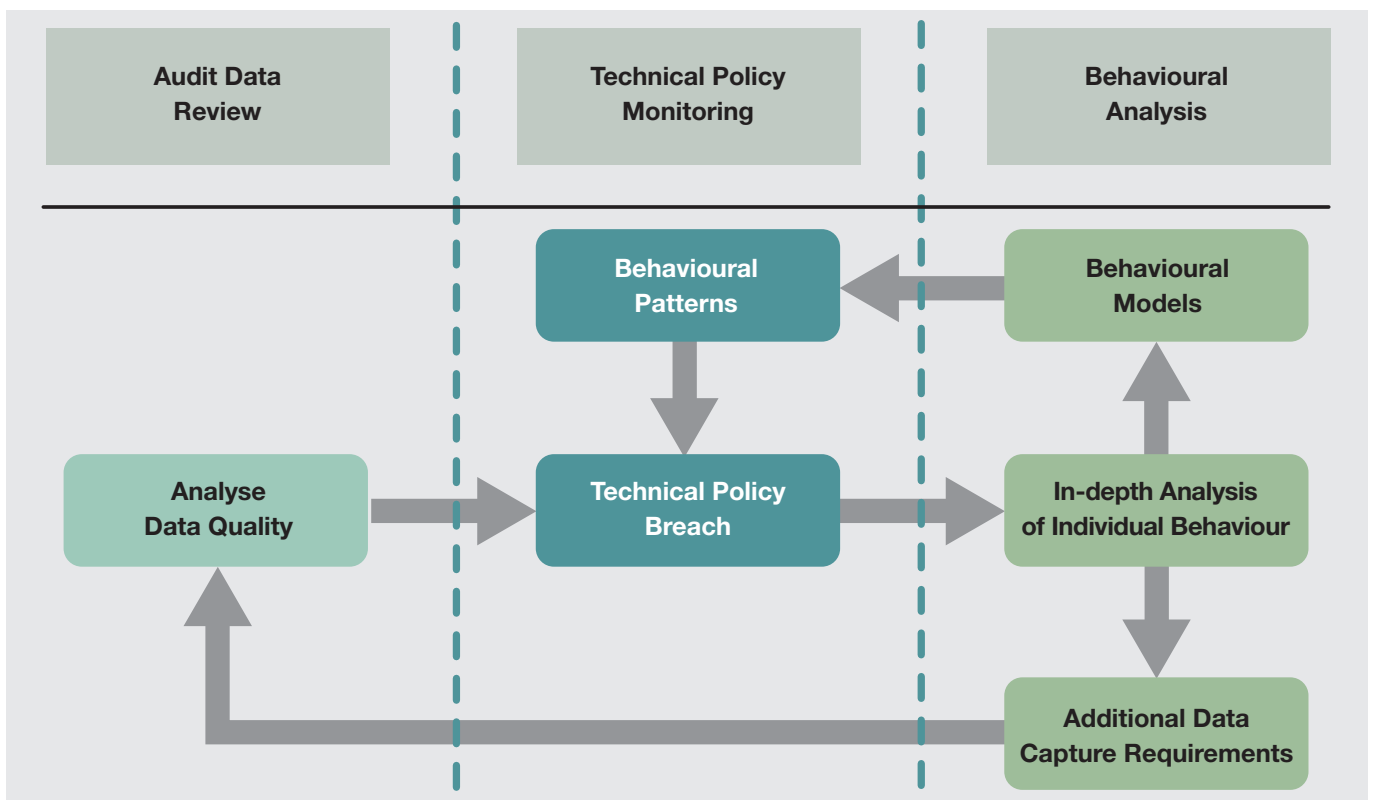


Figure 2 – The Internal Audit Process

The process of internal audit is a continuous activity with constant implementation of measures and counter measures. As a result, the Internal Audit Solution drives continuous interchange between technical policy monitoring and behavioural analysis.

Can you afford to leave things to chance?

With corporate data estimated to be increasing year-on-year by between 40% and 60%, there is a corresponding rise in risk to the security of that data and adherence to corporate governance and statutory compliance requirements. If you don't know who has access to what, how can you be sure that your organisation is being compliant or what your risk exposure is? Alternatively how can you be sure that your competitors aren't getting their hands on sensitive information? If you don't know where vital data is being stored, are you wasting valuable time trawling through a plethora of information resources?

The Capgemini Internal Governance Audit Solution allows you to see 'who, what, where and when' across your enterprise. It is based on experience gained over years of successful solution delivery within the Pharmaceutical, Life Sciences government and other commercial sectors. It utilises robust and proven SAS® software, made scalable through a comprehensive data acquisition capability.

The solution makes maximum use of Capgemini's and SAS's considerable statistical analysis and data mining expertise along with the most sophisticated suite of integrated data mining techniques available today.

Why wait until a threat becomes a reality? Capgemini advocates a discovery workshop where collaboratively we will work with you to determine the likely scale and nature of the threat.

Why Capgemini?

Working collaboratively with our clients, Capgemini and SAS have developed a unique portfolio of expertise in this field following successful real-world deployment of this solution in both the government and commercial sectors. Using our team of subject matter experts in security and audit, the solution is based on an Enterprise Intelligence Platform featuring unrivalled data acquisition, scalable storage, market leading business intelligence and industry standard analytics.



About Capgemini and the Collaborative Business Experience®

Capgemini, one of the world's foremost providers of consulting, technology and outsourcing services, enables its clients to transform and perform through technologies. Capgemini provides its clients with insights and capabilities that boost their freedom to achieve superior results through a unique way of working—the Collaborative Business Experience®—and through a global

delivery model called Rightshore®, which aims to offer the right resources in the right location at competitive cost.

Present in 36 countries, Capgemini reported 2007 global revenues of EUR 8.7 billion and employs over 86,000 people worldwide.

More information is available at www.capgemini.com

For more information contact:

Andrew Yearsley

Sector Director – Manufacturing & Life Sciences
Capgemini UK
Tel +44 (0) 870 904 5197
andrew.yearsley@capgemini.com

Steven Law

Director – Health & Life Sciences Practice
SAS UK
Tel +44 (0) 1628 490 485
steven.law@suk.sas.com