FORGOOD for Audit/Compliance Teams

FORGOOD should be used as a workflow tool, not as a checklist

- Use FORGOOD as a structured discovery tool to identify where behavioural influence is operating across initiatives, and assess its regulatory, reputational, and operational risk
- Apply it as a challenge framework to evaluate whether products, services and organisational practices meet regulatory expectations (incl. Consumer Duty) and have appropriate oversight
- Monitor initiatives continuously, ensuring they remain compliant, proportionate, and protective of customer and employee autonomy as market conditions change

Applying FORGOOD to the Audit/Compliance Team responsibilities

***Identify & Assess** (Risk identification and scoping)*

Using FORGOOD's seven dimensions to surface where products, services and workplace practices use behavioural influence, and assess the associated regulatory and reputational risks. Much of this influence goes undetected as it is built into HR tech and workplace design.

In practice this could be…

- Mapping which functions are using behavioural influence and whether they have appropriate expertise
- Assessing regulatory risks (data privacy, discrimination) associated with identified initiatives
- Identifying gaps in current governance frameworks that allow uncontrolled experimentation on employees

***Review & Challenge** (Independent evaluation of initiatives)*

Evaluating whether initiatives meet responsible standards, comply with regulations, and have appropriate governance. This involves challenging design choices and questioning whether employee autonomy is being respected.

- Conducting FORGOOD assessments of high-risk initiatives to evaluate responsible application
- Reviewing whether initiatives have documented rationale, responsible justification, and business case
- Verifying that opt-outs are genuinely accessible and that employees understand how behavioral influence is being used

***Govern & Control** (Establishing oversight policies and mechanisms)*

Building governance structures, policies, and controls to ensure behavioral influence is uses responsibly. This includes defining acceptable use, creating approval processes, and establishing accountability.

- Establishing approval requirements and stage gates for high-risk behavioural initiatives
- Defining documentation standards (rationale, ethical considerations, testing results, monitoring plans)
- Creating cross-functional ethics committees to review proposed initiatives before deployment

***Monitor & Report** (Ongoing oversight and accountability)*

Continuously monitoring implemented initiatives to ensure they remain responsible and effective, catching unintended consequences, and reporting findings to leadership. This ensures accountability and supports continuous improvement.

- Conducting periodic audits of deployed initiatives to check they're operating as documented
- Spot-checking that initiatives still align with FORGOOD principles as context changes
- Reporting to audit committees, boards, or leadership on behavioral science governance maturity
- Building organisational learning by sharing what responsible application looks like in practice

To help us improve the template,
let us know your anonymous feedback here:
https://forms.cloud.microsoft/e/TUvcUCqtMM

FORGOOD Framework for Audit/Compliance

	Guiding Questions	Reflections, concerns, possible improvements	Pass / Fail / Mitigation / Improvement
FAIRNESS *User Equity*	Could this initiative create disparate impact on protected groups (age, disability, gender, race, neurodivergence, working patterns)? Have results been segmented to verify no employee / customer groups are being systematically disadvantaged?		
OPENNESS *Transparency*	Does data collection for this initiative comply with privacy regulations? Is information about how the initiative works, what data is collected, and how it will be used readily accessible to employees or customers? Are opt-out mechanisms genuinely accessible, or are they deliberately obscured or made difficult to find?		
RESPECT *User Experience*	Would employees view this initiative as supportive if they understood the behavioral mechanisms, or would they feel manipulated? Does this initiative respect employee autonomy, or does it coerce, manipulate, or exploit psychological vulnerabilities?		
GOALS *Value Alignment*	Does this initiative genuinely support employee / customer wellbeing and goals, or primarily serve organisational convenience disguised as employee / customer benefit? When goals conflict, has the tension been transparently acknowledged and appropriately resolved?		
OPINIONS *Brand Reputation*	Have employee representatives, works committees or DEI committees reviewed this initiative? Would this initiative damage employee trust, organisational reputation, or employer brand if details became publicly known or widely discussed?		
OPTIONS *Trade-offs*	Have alternative initiatives been fully considered? Are there other options that preserve greater autonomy and privacy?		
DELEGATION *Governance*	Is there clear accountability and documented ownership for this initiative's design, deployment, and responsible oversight? Does the team deploying this initiative have appropriate behavioral expertise and training?		