

Are you verifying your critical controls – or documenting them? A practical checklist

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Many organisations with critical risk obligations believe they're doing critical control verification. Often, they're doing something that looks like verification but functions like documentation.

The two can be hard to tell apart, even from the inside. Both produce records. Both generate an audit trail. The difference only becomes visible when a control fails silently – and it's too late to catch it with paperwork.

CHECKLIST

This checklist is designed to be applied to a specific critical control in your organisation. Pick one and work through the questions, then check your results against the advice at the bottom.

On the evidence your verification produces

- ☐ Does your verification activity produce evidence that the critical control is in place and working – or evidence that someone reported it to be?
- ☐ If a regulator asked to see proof that this critical control was functioning last Tuesday, could you show them something more than a completed form?
- ☐ Is the person completing the verification check the same person responsible for the critical control? If so, is there an independent check at any point?
- ☐ Does the verification record capture what was observed – or only whether the result was satisfactory?

On frequency and coverage

- ☐ Is the verification frequency calibrated to the severity of the risk, or does it default to your audit cycle?
- ☐ If this critical control failed today, how long before your current process would surface it?
- ☐ Is verification happening across all locations, shifts, and contractor teams where this risk exists – or only where it's convenient to check?

On what happens when issues are found

- ☐ When a verification check surfaces a problem, is there a clear escalation path – or does it depend on the individual who found it?
- ☐ Can you point to examples where verification activity caught a control lapse before it became an incident?
- ☐ Does your board receive information about critical control verification results – not just incident counts?

On whether the process is fit for purpose

- ☐ Does the person conducting the verification understand what an effective critical control looks like for this specific risk – well enough to distinguish genuine compliance from the appearance of it?
- ☐ Would the verification process surface a situation where the procedure is technically being followed but the critical control isn't functioning as intended?
- ☐ If you asked the workers closest to this risk whether they think the critical control is being genuinely verified, what would they say?

WHAT THE ANSWERS TELL YOU

No single question is diagnostic on its own. But a pattern of "no" or "I'm not sure" answers – particularly in the first section – is a reliable indicator that what you have is closer to documentation than verification.

If this checklist surfaces gaps, the next practical step is to work back through the critical controls that matter most.

Ask what genuine verification would look like for each one – what evidence it would produce, how frequently it needs to happen, and who's equipped to do it.

That's a harder question than "do we have a process?", but it's the one that needs to be asked and answered properly.