Five Elements of Effective Compliance Education

Introduction

In a 2013 survey of ethics and compliance professionals, nearly 80% of respondents listed employee training as a high priority or one of their top priorities. Seventy-seven percent of the same respondents considered training as one of the most important tools in ensuring a successful compliance program.[1]

Additionally, estimates are that a quarter of compliance budgets are spent on communication and education initiatives.[2] As compliance budgets continue to increase year over year, many of those dollars will be funneled into compliance training and learning management.

Ensuring that the dollars are not just spent, but spent well, is an ongoing challenge. With some studies suggesting that 90% of training information is immediately forgotten, coupled with the fact that many companies only dedicate one to three hours a year to employee education, how can compliance officers ensure that training is not just a box checked, but a function that positively impacts their company culture?[3]

While not a simple task, it is absolutely a doable one. Take the following five elements into consideration when planning your staff training campaigns to ensure that they are not only carried out, but carried forward in the minds and actions of your staff.

1
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Focused

ELEMENT 1: FOCUSED

Before you ever step foot into the classroom or hit send on that email containing a training video, you'll want to make sure that your educational content is FOCUSED. In the case of compliance professionals, there are multiple audiences and obligations to which your trainings must map.

Regulatory obligations

Some trainings, such as those around sexual harassment, will be mandatory for all personnel in your organization. But you probably won't be inviting shop floor workers to attend a seminar on Sarbanes-Oxley (SOX) compliance. While that may seem obvious, it remains an uphill battle to parse out which federal, state and international regulations are most relevant for specific segments of your workforce. If you spend too much on subjects that do not pertain to them, they may tune out the whole thing.

Organizational goals & values

In addition to external obligations, you have your firm's values, goals and behavioral expectations to convey—perhaps all neatly packaged in an employee handbook or a Code of Conduct. These are often lengthy documents that cover everything from dress code to PTO to insurance options and more. You may give a new hire a hefty three-ring binder or email him an 80-page PDF, but delivery of content does not ensure its understanding or retention.

Consider also whether there are particular areas of risk in your organization due either to the nature of your business or identified during a risk assessment. A history of corruption or discrimination, whether enterprise-wide or at a particular location, calls for a training highlighting your firm's expectations around these issues.

Employee needs

Your staff also have their own needs that require attention. Besides their roles and responsibilities, their geography is an important consideration. If your firm has different locations nationally or internationally, staff in a particular locale may be subject to certain requirements not applicable at all sites.

Past training and performance reviews are also useful to consider. And while it may not be possible to conduct an assessment around individual learning styles, making sure that your educational content is varied enough to meet the needs of different types of learners is a good strategy. One way is to use a combination of formats, including in-person training, video, eLearning and reading. Some firms even use games to convey important information.[4]

2
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Consistent

ELEMENT 2: CONSISTENT, YET CONTEXTUAL

Once you've assessed and FOCUSED your training needs, you'll want to ensure a CONSISTENT roll out across your entire enterprise. This can be a challenge in cases where different trainings and policies are owned by different departments and managers, or in firms with multiple locations.

Some organizations find it helpful to address this through use of a cloud-based repository where trainings and other educational content can be stored, accessed, updated and distributed by the appropriate managers, while maintaining centralized oversight. A cloud-based repository can make your trainings accessible and consistent across your entire enterprise—locally and globally.

The reason behind the rules

However your firm chooses to address consistent access and distribution, it is important not to lose the capacity for localization. According to Richard Steinberg, "[Employees] need to understand the reasons behind the rules... The reality is that employees who don't know why they're supposed to do something will go through the motions with a checklist mentality, if at all."[5] Providing context, however, can help your training stick. Three ways to provide context follow:

- *Explicitly connect your regulatory obligations to your company's policies, mission and values. If one of your values is "Respect for one another," this could be referenced during an EEOC training on discrimination and harassment. It could be tied to your company's Code of Conduct as well. Understanding the policies from federal, corporate and interpersonal angles will help your staff retain the training.*
- *Make training materials pertinent to the day-to-day activities of your employees. The more they are able to see how the rules apply to their actual roles, the better it will be integrated into their understanding of their job function.*
- *Deliver trainings in a way that your staff can understand. While it may be obvious, having corporate counsel deliver a lesson on OSHA standards might be appropriate for senior management, but the shop floor crew would better relate to receiving that lesson from their foreman. This same principal can be applied to overseas trainings by taking into account local customs, expectations and language.*

Ensuring that you trainings are both CONSISTENT across the enterprise, yet CONTEXTUAL for local needs requires a certain level of flexibility in your education planning and deployment. A FLEXIBLE training program is important in other ways as well.

3

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Flexible

ELEMENT 3: FLEXIBLE

However much effort you've put into making your trainings FOCUSED, and CONSISTENT yet CONTEXTUAL, the best laid plans often need to be tweaked in response to changing or unexpected circumstances. Designing your educational plan to be FLEXIBLE can help you respond to such events with ease.

While most companies hold major trainings every one to three years, educational needs will inevitably arise in the interim. These could be triggered by turnover or company growth that sparks a flurry of new hires. It could also stem from a merger or acquisition. And there is always the churn caused by regulatory change.

Stay agile

While classroom sessions are useful, scheduling sessions and coordinating staff calendars can increase time to training. In circumstances where a new regulation or issue needs to be communicated immediately, email or intranet communication is a rapid-fire way to get your message out.

Taking advantage of mobile technologies is another means of building flexibility into your training program. When employees can log in and receive training in any location, from any device, you are empowered with the tools for a responsive, up-to-date compliance program.

Yet deploying such a program without MEASURABLE results would not do you any good. Ultimately, whatever form your trainings take—paper or pixel, online or off, in a class or individually, it is vital to measure not only that training occurred, but whether the relevant knowledge was gained.

4
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Measurable

ELEMENT 4: MEASURABLE

A 2013 compliance survey revealed that 31% of compliance professionals make no effort whatsoever to MEASURE the effectiveness of their programs. The remaining two-thirds who do attempt measurement consider the metrics that they track to be inadequate.[6] And when it comes to compliance training specifically, a recent LRN survey reveals that "More than 70 percent of [compliance professionals] report education completion rates to their boards, and they remain practitioners' most commonly used measure of the effectiveness of their education programs."[7]

If it's worth teaching, it's worth testing

What completion rates leave out, however, is whether or not the material taught is actually retained and applied by the students. Compliance professionals should live by the mantra, "If it's worth teaching, it's worth testing." There are a number of ways they can do this:

- *Test against any training and track your staff's scores. Even classroom trainings can be followed up with a survey or short test to measure understanding.*
- *Track the number of incidents that occur around a particular issue, both before and after training. If behaviors do not improve, a new approach or follow-up training may be needed.*
- *Survey compliance understanding weeks or months after training. Issues can arise at any time, so you want to be sure your staff remains versed in the knowledge they need.*
- *Tie compliant behavior to employee evaluations and performance reviews. "Inspect what you expect" is another mantra to live by.*

Once you have a system for delivering FOCUSED, CONSISTENT yet CONTEXTUAL, FLEXIBLE, and MEASURABLE trainings, the final element to really make your efforts effective is to fill the interim between major trainings with reminders that keep compliance issues top of mind for your staff year round.

5
On
Ongoing

ELEMENT 5: ONGOING

As noted in the introduction to this piece, some studies suggest that 90% of knowledge gained in a training may be lost immediately following the session. After you've gone through all the trouble to make sure your compliance training is FOCUSED, CONSISTENT, FLEXIBLE, and MEASURABLE, it would be a shame to educate employees only to have the information go in one ear and out the other.

ONGOING training is a way to keep compliance issues top of mind for your staff in a way that builds upon the depth of information they receive in more formal trainings. This reinforcement supports long-term learning and revisiting similar information from different angles deepens retention.

Ways to keep compliance education fresh

- *Include a compliance section in the company newsletter that highlights issues covered in the training.*
- *Put up a message board on your company intranet specifically for discussion around compliance and ethical issues.*
- *Email news articles around current events that touch on issues important to your company and include a high-level overview of compliance take-aways for your staff.*
- *Have managers at the departmental and local levels of your organization highlight compliance topics and ethical successes in their staff meetings.*

If you are able to deploy a centralized library for your policy and trainings, via your intranet or another cloud-based solution, this is another means to support ONGOING training. Trainings are usually a one and done event that rely on memory or note-taking for retention. But a centralized repository accessible to all staff allows them to log in and search for information whenever and wherever they have a question.

Ultimately, having MEASURABLE trainings combined with a FLEXIBLE educational program allows you to see, in real-time or near real-time, the compliance health of your workforce. An ONGOING response to this data can then be used to reinforce, tweak or even retrain where necessary.

CONCLUSION

This article has tried to paint a picture of how to make compliance training more effective—not just a check box but an integral part of transforming your company culture and meeting both regulatory obligations and internal company goals. In summary, to enhance your efforts, make sure your trainings take into account the following elements:

- *FOCUSED – Covering the right materials for the right people at the right time.*
- *CONSISTENT, yet CONTEXTUAL – The same across your enterprise, yet tailored for local needs.*
- *FLEXIBLE – Adaptable to changing circumstances in a timely fashion.*
- *MEASURABLE – Providing metrics that allow you to understand your training effectiveness.*
- *ONGOING – Delivered, in smaller bites, between your annual or semi-annual training sessions.*

Enter Convercent

Ultimately, you should be able to see and respond to the impact of training on your company culture and workforce behavior. This visibility occurs when you tie together your compliance training with your company values, policy library and incident investigations. While it is possible to cobble together an ad hoc solution for storing and tracking trainings and other campaigns, Convercent was built from the ground up to integrate these compliance areas and provide unprecedented intelligence into the health of your organization. Some benefits of Convercent include the following:

- *Multi-media capable with SCORM integration*
- *Link to your current LMS, upload your content, or utilize one of our content partners*
- *Cloud-based, central repository for ease of access and distribution of training*
- *Organizational mapping that makes it easy to target an individual or an entire location*
- *Audit trails for all courses sent, taken and scored*
- *Survey engine for follow-up measures of retention (or initial assessment of need)*
- *Contextualized learning through integration of training, policy, values and case management*
- *Intelligent dashboard that gives you a bird's-eye view of your organizational health at a glance*
- *Fast to set up and easy to use*

REFERENCES
[1] 2013 Global Compliance and Ethics Benchmarking Survey. SAI Global.
[2][4][7] 2013 Ethics & Compliance Leadership Survey Report. LRN.
[3] "So Much Training, So Little to Show for It." Wall Street Journal.
[5] Steinberg, Richard. Governance, Risk Management, and Compliance: It Can't Happen to Us – Avoiding Corporate Disaster While Driving Success. John Wiley & Sons, Hoboken, NJ. 2011.
[6] In Focus: Compliance Trends Survey 2013. Deloitte and Compliance Week.

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