



# 10 tips to improve your compliance training program

If you're worried about whether your curriculum is truly effective, read on for advice on how to take it to the next level.



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While training is traditionally one of the more thankless jobs in compliance, it is evolving from a tedious (yet critical) requirement to an engaging, strategic opportunity. If rolled out properly and effectively, it not only keeps your organization walking an ethical straight line but, in some cases, actually helps identify strengths and weaknesses in culture. If your company isn't seeing that type of return from your training program, read on for a lesson in how to inject some life into your curriculum.

## 1 Incorporate storytelling

People learn through stories. Share case studies of lessons learned, employee insights gained through helpline guidance, focus groups, and any annual employee culture surveys. Keep abreast of compliance failures in the news and use them to your advantage (Compliance Week, The FCPA Blog, SCCE's Corporate Compliance Weekly News, and The Compliance Podcast Network are great sources).

## 2 Relevancy is everything

Training should cover scenarios that employees realistically could face, based on the enterprise risk assessment. When you outline a scenario, be sure to state the information in plain and simple language (no legalese!). As shared by Mary Shirley, senior director, Fresenius Medical Care North America: "Too often compliance training focuses on theory and does not provide helpful context for employees. I've seen training that goes into the definitions of active and passive bribery. Colleagues don't need this to help them do their job better. They need content that tells them how to do their day job in conjunction with compliance principles and risks."

## 3 Be culturally literate

If you have an international or multicultural workforce (and who doesn't these days?), partner with regional HR to make sure your training reflects this.

As Fabiana Lacerca-Allen (SVP compliance, Aimmune Therapeutics) states: "To be truly effective it has to be done in the local language, in terms that people can understand and contain examples that correlate to their culture, language, jurisdictions. One size does not fit all."

If your employees don't understand or relate to your training, you miss the opportunity to open channels of communication, foster trust, and create the right conversations.

## 4 Enable peer learning and open discussion

Training should be viewed as an opportunity to focus employee awareness of possible situations and enable discussion—as a starting point.

"An effective training program emphasizes that there can't be a rule for everything, that our values will get tested, so when there's uncertainty as to a decision, unpack that challenge with your support team," offers Richard Bistrong, CEO of Front-Line Anti-Bribery.

## 5 View it as a strategic all-enterprise opportunity

Training is a huge investment—expensive and time-consuming, so companies should take time to get "all hands on deck" collaborating to make the most of the annual opportunity.



Build your training with people in mind using role-based training assignments that are relevant to the specific job. Not everyone needs everything. When you design a curriculum, ask yourself: “Am I giving people what they need? How do I know?”

Compliance and human resources have a shared mission to create a healthy workplace culture. In furtherance of this objective, Compliance and HR should partner with corporate communications to build a cross-functional team (with support from the top) to design and execute an effective training rollout plan that ensures it is truly a corporate initiative.

## 6 Emotional hooks

The best training can be measured by employee engagement levels. When you release modules, do you hear people sharing the stories? Can you get employees to talk about it in the hallways/cafeteria the way they do about Super Bowl halftime commercials? Once launched, get out walking and talking in the hallways for instant responses and take note.

As Gwen Romack, senior director at VMware says, it's effective “if employees follow up with questions, ideas, or concerns.” Mary Elizabeth Christian, senior manager at Novo Nordisk, agrees: “Am I receiving (on-topic) questions or comments during and after training? Session engagement is key!”

## 7 Never treat it as a “one and done” process

You must have an ongoing reinforcement plan. We know from marketing experts that people must hear a message at least 7 or 8 times before it sinks in. If you don't commit to the follow-up, you look inauthentic and you won't influence behavior. Training should be one tangible piece of an overarching compliance communications annual plan that incorporates multiple methodologies of learning.

From Lisa Beth Lentini, CEO of Lumen Worldwide Endeavors: “One-size-fits-all training will not work for everyone, so you need to flex your training to incorporate visual, auditory, kinesthetic, and other types of learners to get the most impact.”

## 8 Incorporate a curriculum approach

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## 9 Provide on-demand access to answers

We live in a Googleable world of instant answers. How often this week did you ask the internet a question and immediately get the answer you needed, just in time? So—why can't we emulate this capability in our training? If we want to truly be helpful to our colleagues when they are faced with challenging dilemmas or simply don't know if a payment for services is risky, we need to design compliance with the consumer (i.e., employee) experience in mind.

On a related note, consider this tip from Ali Hawthorne, global compliance officer, Boehringer Ingelheim, which enables learning, maintains engagement, and creates more of a dialogue than a “gotcha” testing experience: “Eliminate the test at the end. Instead, test knowledge throughout; and, if the learner selects the wrong answer, simply explain why it's wrong and move on.”

## 10 Gather valuable, actionable data for your company

Or as Mary Shirley says, “Think of compliance as a place to take information in—not push out.”

In the digital age, you should be aiming to take in more information than you are sending out. We need insights to inform our programs and actions—data about trending issues, concerns, and risks to the company.

Training can be a strategic feedback mechanism for the organization. For example, some compliance failures occur because people simply avoid conflict. If you know this, you can incorporate skill-based training on productive conflict targeted to those who need it.

We all know that the most common metric for training—completion rates (though attractive in their objectivity)—prove nothing about the effectiveness of the training. Let's work together to ensure that training is a meaningful way to gain insights you otherwise may not find on a day-to-day basis. ■