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How to get the most out of your COMPLIANCE TRAINING

About us

COMPLIANCE WEEK

Compliance Week, published by Wilmington plc, is a business intelligence and infomration service on corporate governance, risk, and compliance that features a daily email newsletter, a bi-monthly print magazine, industry-leading events, and a variety of interactive features and forums.

Founded in 2002, Compliance Week has become the go-to resource for chief compliance officers and audit executives; Compliance Week now reaches more than 60,000 financial, legal, audit, risk, and compliance practitioners. www.complianceweek.com

VinciWorks

Founded in 2004, VinciWorks is a leading provider of online compliance training and risk management software. With over 250,000 users across 70 countries, VinciWorks has established itself as the definitive authority in online compliance. VinciWorks offers a range of compliance and regulatory training courses on topics such as GDPR, sexual harassment prevention, the Fourth Anti-Money Laundering Directive, the Criminal Finances Act, the Modern Slavery Act, the Bribery Act, cyber security, the Equality Act and more. All of VinciWorks' courses are customizable and can be tailored to suit the industry and specific policies of each client. www.vinciworks.com

Survey: Lack of adequate funding for training pervasive

If you're among the practitioners who need more resources to turn your compliance training program into one that is truly effective (and that's many of you, according to our survey), we have some advice. Story by [Dave Lefort](#).

Nearly half of respondents to a recent survey of compliance practitioners said their compliance training programs were "good enough to check the boxes" but could be much better and lacked adequate tools to increase its effectiveness. That number jumped to about 60 percent among respondents who indicated they had an insufficient budget for said training.

The training survey, conducted jointly by Compliance Week and compliance e-learning provider VinciWorks, found that 42 percent of 255 respondents felt they didn't have the resources needed for their programs, leaving them with lower overall

completion rates and notably less confidence in their training than those who indicated they had a sufficient training budget.

If you're among the group with a budget that isn't big enough to cover the training needed to match your risk profile, what's the best way to make a case to leadership for more resources?

It might be as simple as citing completion rates—those surveyed with insufficient training budgets reported average completion rates 15 percentage points below those who were happy with their resources—but there's a more relevant, more effective case to be made by citing real-life examples.

VinciWorks Chief Operating Officer Josh Goodhardt calls it "near-miss" reporting.

"You don't just report your data breaches, for example, but the times where you almost had a data breach," he said. "If you can do that and show that to senior management how close you came, how this could have gone wrong, and if you can show evidence of people doing the right things that protect the company and save the company money, that's the kind of evidence that will resonate with people at the senior level."

Another way to make your case is by appealing to a bottom-line mentality: A better-trained workforce ultimately saves the company money.

"It's often the case that the impact of a breach, a regulatory fine, or reputational damage from a bad action is so severe that the cost of the training as compared to the possible cost of the consequence is relatively tiny," Goodhardt explained. "The additional marginal cost of getting training up from barely protecting a company to training that actually makes a difference, that gets people thinking and changes people's behavior—it's a relatively small amount of additional money. The result is far greater protection across all of these different areas in which the business has risk exposure."

How do you measure the effectiveness of training?

Most compliance training is now done online, the survey information tells us; and a large proportion of it is self-directed, which means more of the onus is on the employee to

In partnership with VinciWorks, CW asked more than 200 compliance practitioners about their training programs.

How would you describe your compliance training program overall?



be proactive about completing all of the required learning. Without the built-in interventional component of live training, what's the best way to ensure the training does what it is intended to do—instill important knowledge and change behavior?

In our survey, respondents ranked “internal audit/spot checks” as the best measure of the effectiveness of training, followed by evaluation results and fewer infractions. Not surprisingly, completion percentage did not rank among the top answers.

“Risk assessment and internal audit are two sides of the same coin. Internal audit is just a risk assessment that you do after the training has been done instead of before the training,” Goodhardt explained. “What you're doing before the training is figuring out: ‘What is our exposure as of now? What do our people know? What are our areas of risk? What are the scenarios that we see something going wrong?’

Then you do your training and undergo the same process again, and call it an internal audit, to determine what has changed. Where do we stand now compared to where we stood before that training was rolled out?”

‘Relevance is the antidote to boredom’

The elephant in the room when it comes to self-directed online training is that it can be boring and, at times, unrelated to those tasked with completing it. And if the content

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Josh Goodhardt, Chief Operating Officer, VinciWorks

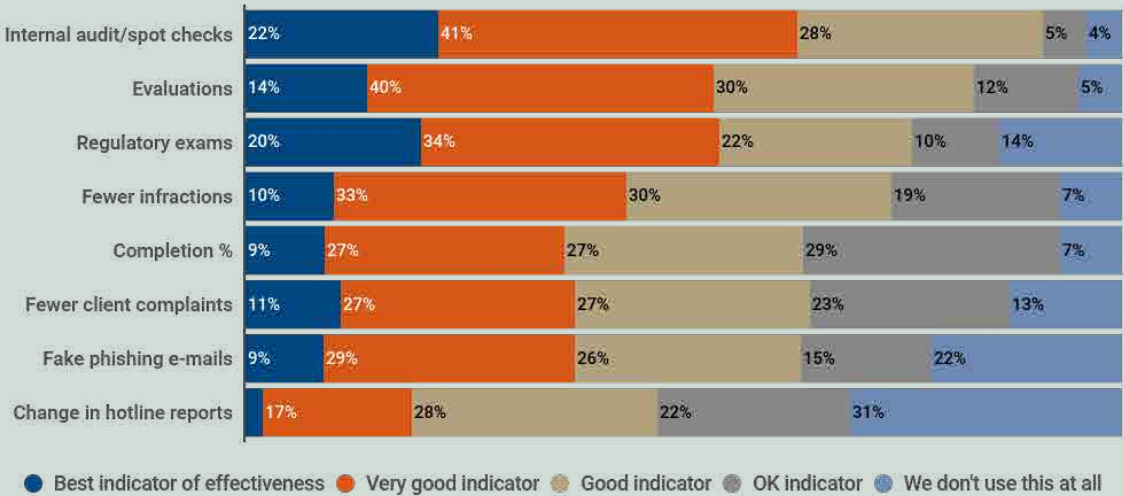
isn't engaging the learner, it's not going to stick and is ultimately going to be a waste of everyone's time.

Among survey respondents, 34 percent noted boring content as the biggest challenge with online training, finishing a close second to a “lack of interaction” (43 percent). Not far behind was content that isn't relevant to the individual taking it.

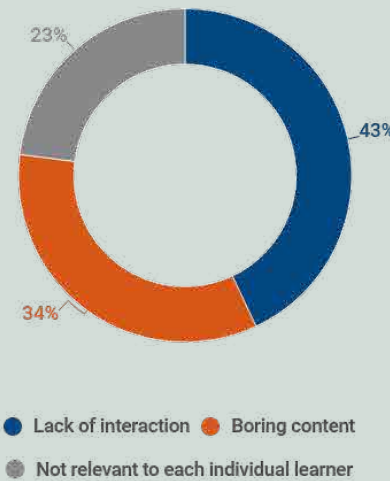
Goodhardt has a solution for that: Personalized, compact training. Get in, get the message across in a way that's relevant and absorbable, and get out.

“Relevance is the antidote to boredom,” he said. “If you want it to stick, it needs to be memorable and it has to be appropriate to the learner and relevant to their job.”

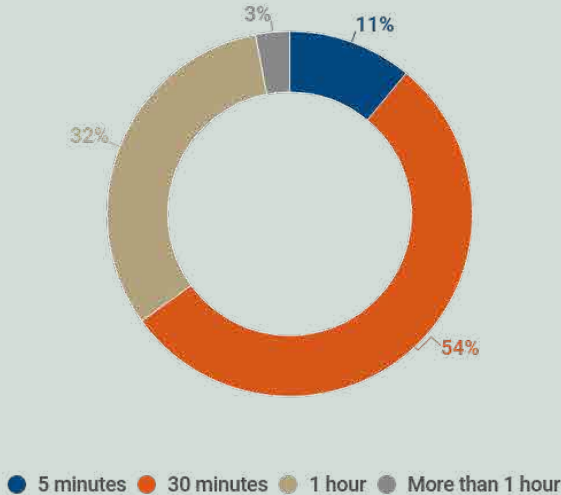
How do you rate the following methods of measuring the effectiveness of compliance training?



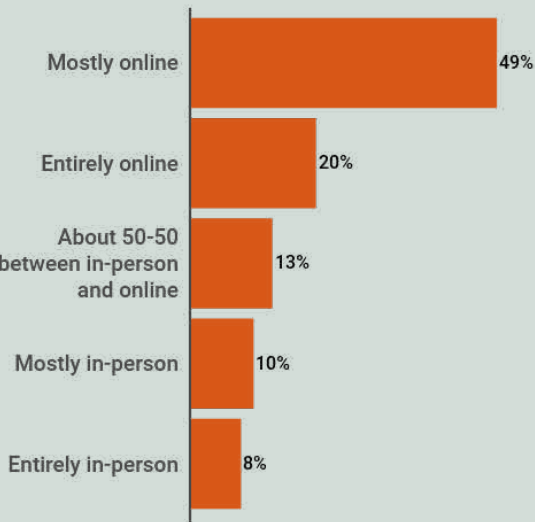
Which is the biggest challenge with online training?



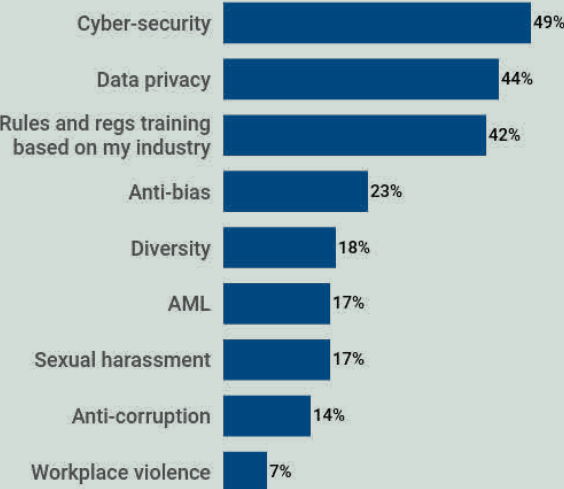
What is your preferred length for online training sessions?



How much of your compliance training is online versus in person?



Within which topics do you find training to be the most difficult? (Select up to three).



“It is far easier for a learner to absorb and later recall an example from a training course that closely reflects a context they recognize or a situation they would encounter in their everyday work,” he explained.

The preferred length for online training sessions given by survey respondents was 30 minutes, but Goodhardt suggests cutting that in half.

“The trend over the last several years has been toward shorter and more frequent training,” Goodhardt said. “Our sweet spot now is 15 minutes for ‘traditional online training,’ though more and more companies are looking at ongoing ‘awareness campaigns’ of shorter durations that target the audience more frequently throughout the year.”

Financial services in focus

Among practitioners who took the survey, 37 percent indicated they were in the heavily regulated financial services sector, by far the most popular response. This included broker-dealers and people in in banking and asset management as well.

Not surprisingly, this group indicated that successful regulatory exams were the best indicator of an effective training program. Respondents in financial services, on average, said they were required to complete more hours of training per year than all other respondents; another 27 percent indicated they were required to complete more than 10 hours of training per year. Additionally, among all other respondents, just 14 percent indicated they needed to complete that much training.

Interestingly, respondents in financial services were not more likely to have a training program that was either very good or cutting edge as compared to respondents in all other industries. About 45 percent of people in each cohort (financial services and non-financial services) expressed a high level of confidence in their programs. ■

Three signs your training isn't effective

While it can be hard to quantify the degree to which a compliance training program is effective, it's usually much less difficult to identify a program that is clearly falling short.

In a recent training survey conducted by Compliance Week and e-learning provider VinciWorks, we asked an open-ended question to ascertain what things practitioners look for that indicate their training isn't effective. The answers we received generally fell into three categories of warning signs you can use to help determine if your program, too, is ineffective:

1. No support among leadership

Some practitioners cited “lack of employee awareness” about the training, a need to “nag” employees to ensure completion of the training, incredibly low completion rates (even after repeated reminders), and “managers who don't believe in the training.” These all point to a problem at the executive level. If the message sent from on high is that training isn't a priority, employees are going to model that behavior.

2. Employees aren't taking the training seriously

Even if the training is properly prioritized by management, that only ensures learners will complete the training—not necessarily take it seriously. This issue was reported by a number of survey respondents, with symptoms including “people completing the module way too quickly,” learners “needing to take the evaluation several times before getting a passing grade,” a large number of people “complet[ing] the training on the last day,” and a much more subtle indicator: “No questions, no complaints about the training.”

3. Poorly designed/executed training

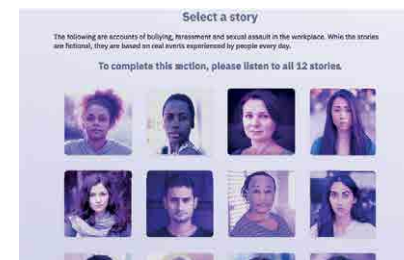
Let's assume your training program has buy-in from both leadership and employees; that still doesn't ensure effectiveness. There might continue to be a problem with the design of your curriculum or the method used to train. Here are some survey responses that likely point to an issue with the training itself: “People making repetitive errors,” learners not completing a training module “but thinking they had,” the lessons taught during the session “not being applied in the workplace,” and “having to repeat the same exact training year after year, with no changes applied.” All those complaints point to potential issues with the program itself. These should be a signal to look critically at the tools or methods you use in training.

—Dave Lefort

VinciWorks THE ANTIDOTE TO BOREDOM IS RELEVANCE

TURNING COMPLIANCE FROM A NECESSARY EVIL TO A NECESSARY GOOD

VinciWorks is passionate about behavioral change. We believe that e-learning has the potential to surpass the classroom experience by delivering targeted, personalized content that feels relevant to every learner. We collaborate with our clients and form "core groups" to collectively build industry standards. This results in e-learning that is engaging, customizable and effective.



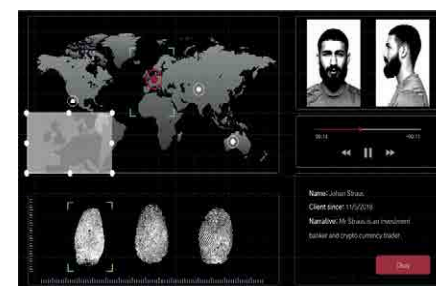
Harassment and Bullying



Mental Health



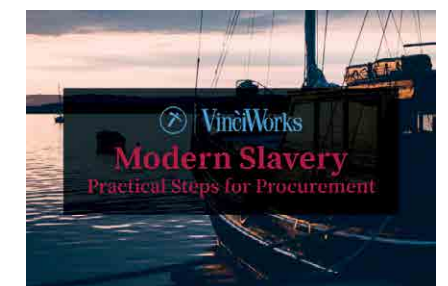
GDPR and CCPA



Anti-Money Laundering



Tax Evasion and DAC6



Modern Slavery



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.



BY AMII BARNARD-BAHN, COMPLIANCE WEEK COLUMNIST

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

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?"

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. ■

Ask a CCO: COMPLIANCE TRAINING

Six senior compliance practitioners with a combined 81 years of experience offer their perspective on what makes an effective training program and share tips and guidance for companies looking to enhance their curriculums.



CÉDRIC DUBAR

Chief Compliance & Ethics Officer
Volvo

Years in compliance: 17



MATT GALVIN

Vice President, Ethics & Compliance
Anheuser-Busch InBev

Years in compliance: 5



ANA IACOVETTA

VP, Deputy GC and Chief Ethics & Compliance Officer
VMware

Years in compliance: 12



DIANA JAGIELLA

Vice President, Chief Compliance Officer
The Mosaic Company

Years in compliance: 27



EILEEN MCCARTHY

VP Assoc General Counsel Corporate Governance
JetBlue

Years in compliance: 5



CATHERINE MUSTICO

CCO
TruClarity Wealth Advisors

Years in compliance: 15

1. How do you measure the effectiveness of compliance training?



GALVIN:

If the training is to raise awareness, we look for an **increase in reports on a certain issue**. For example, from our new conflict-of-interest policy and training, we saw a surge in the number of gifts put up for our yearly holiday charity auction that would have otherwise violated the policy.

MUSTICO:

I measure this by **how well the spirit of the regulation is understood**. If the advisors/ reps know why the policy exists, they can more effectively comply when situations fall into the grey areas. I also find that when they understand, **they loop me in early** before there is a problem.



MCCARTHY:

We see the ultimate effectiveness of compliance training **in our day-to-day interactions** across the company—someone sees something that might be off and **reaches out to report it**. Folks in meetings are **comfortable respectfully correcting their peers**.



IACOVETTA:

We look at **direct correlations between the training content and resulting activity levels**. For example, if we cover conflicts-of-interest, do we see an uptick in the number of conflicts disclosures submitted for review?



JAGIELLA:

We measure effectiveness through **testing, audience feedback, audits, and company compliance performance**. Proficiency testing on key points should be part of every training. Similarly, audience members should be asked to complete a feedback form asking whether they understood the training and how the principles apply to their job.



DUBAR:

We observe learners' reactions during class—Do they ask questions? Do they participate? And we **ask their opinions**, which helps us adapt the training, in real-time if needed. Using **dilemmas, quizzes, simple tests, case studies, role play**, etc. during the training ensures that a given learning objective is understood.



IACOVETTA:

Make sure the delivery is **fast-moving, interactive, relevant** and **relatable**. Use **interactive touchpoints** selectively throughout the training as a way to keep them focused—for online training, this can be done by including **virtual flip cards** or **image clicks** on the screen; **polling the audience** works well in live training.



MUSTICO:

Comedy. Pure and simple. Whether it is inserting into the Business Continuity Plan and Policy a **provision for a zombie apocalypse** (they can't kill the Chief Compliance Officer even if I turn), or some other ridiculous scenario, it keeps an otherwise boring subject mildly entertaining.

2. How do you make your compliance training engaging?



GALVIN:

The keys to engagement are **relevance, brevity** and **interactivity**. Our trainings are interactive, animated, **choose-your-own-adventure style videos**. There are times when all of the possible answers are wrong, others when they're all right. That way we elevate the experience and make it difficult for people to just click through.

MCCARTHY:

We like to use **humor** and **real life** (deidentified) examples—especially if the examples have gotten **public media coverage** or, if an internal issue, the issue has become known throughout the company ... If the latter, we still deidentify the individuals involved.



JAGIELLA:

I open by sharing a **real company event** that illustrates how compliance dilemmas arise in the workplace. The more startling the event, the better. **Relatable stories** help the audience understand how this disconnect occurs under business pressures.



DUBAR:

Avoid boring compliance lectures, and keep formal training short to avoid training fatigue. Be engaging by including **interactive** elements (**role play, dilemmas, group projects** and **discussions, real case scenario, games**, etc). Learners are more interested if we help them solve their problems.



JAGIELLA:

Improve content relevance. Customize commercially purchased online training to **make it germane** to your business operations and audience responsibilities. Openly discuss the threat to compliance arising from extreme business pressure, priorities that conflict with stated values, and inconsistent discipline. When faced with a difficult compliance issue, those attendees will be more likely to seek your guidance because you “get it.” Adding some **humor**, even if somewhat **irreverent**, keeps the audience with you.



MCCARTHY:

Even the most engaged audience can suffer from **training fatigue**. Include different types of items to avoid boredom—including **questions, pop ups, skits**, etc. It should also be brand compliant (look, feel, use company lingo, if you have them), so the folks taking the training know that it is company specific.

MUSTICO:

Resources and **attention spans** are finite. Make the best use of your training program by applying a risk-based approach based on the areas of deficiency highlighted during any audits and/or exams.



3. What advice would you give to a practitioner looking to improve a training program?

IACOVETTA:

Invest time and resources up front to **understand the audience** you are trying to reach and what blockers or biases you need to overcome to get them to be receptive and engaged. **Do not assume** that because you've been working in the same company for many years you know what your audience needs or wants or what approach will resonate with them today.



DUBAR:

Create a matrix of compliance learning needs based on **organizational risk, role/task risk**, and **learner analysis**. Don't forget to **focus on company culture!** Break up your materials into small, easily understood pieces; consider the delivery order for your trainings; and integrate interactive elements like storytelling and scenarios, etc. Make training **repetitive** to anchor knowledge.

GALVIN:

Show scenarios that depict things **specific to your field**, so your employees feel spoken to directly. When you're trying to educate, it's best to **give the edited version**. We brought in Labyrinth Training, an interactive design company with a background in storytelling, editing, and entertainment, and that has made a real impact.





GALVIN:

We want to know that our employees came out of the training experience **armed to change their own behavior** and to know **when and how to report troubling behavior** they see elsewhere. I like to think that the characters in our trainings are memorable mostly because people don't want to end up in the same tough spots the characters find themselves in.

4. What differentiates a “check the box” training program from one that’s truly effective?

MCCARTHY:

The truly effective training resonates with learners in a way that **sticks with them**. It isn't too highbrow or too antiseptic. And we want them to know who to call for help if they find themselves in a tricky ethical situation.



MUSTICO:

Thinking a little outside the box, by putting a little more focus on the **why vs the what**, is important, as is focusing on **what they can do**, instead of always what they can't. Also, I'm not aware of any rule that states your compliance manual has to be boring.

IACOVETTA:

Often, trouble occurs in situations that cannot be addressed by a linear step-by-step approach or where **there is no clear and obvious path to take**. Effective compliance training assures that the audience **has the tools necessary to identify potential trouble spots** and navigate them effectively by **applying the principles and values** that underpin specific rules.



DUBAR:

A training program is effective if learners **apply their knowledge in their daily work**. An efficient compliance training program is not only about applying compliance knowledge, it is also about **understanding company values and culture**. Our managers are expected to be **role models** and **promote ethical conduct** and perform mandatory **“responsible business discussions”** with their team members.



JAGIELLA:

“Check the box” criticism often stems from **tedious, uninspired** formats and **“dry”** content. An effective training program will inspire the audience that **compliance is our common mission**.



DUBAR:

The face of compliance training is changing at high speed thanks to **Artificial Intelligence**. AI identifies a learner's needs, knowledge, and preferences and, thus, can **adapt training curriculum and instruction in real-time**. Trainings are short and more targeted toward what the learner doesn't know.



MUSTICO:

Compliance training will have to evolve to be more **customized**. There will eventually be an AI system that can learn what the adviser is doing, and **specifically train to the regulation**. If my car can buzz my seat because it detects that my eyes are no longer on the road, it doesn't seem farfetched for compliance to get a report of how much the trainee actually looked or read the material.



MCCARTHY:

I think compliance in 5 years will have more bells and whistles (**VR**, maybe **holograms!**), but it will also be human in a way that the best training is now: **stories about people**.



GALVIN:

The best companies will **bring in expertise from elsewhere**—whether that will be behavioral scientists, editors, animators, or illustrators. My overall hope for compliance training is that it becomes a thing that everyone looks forward to doing, as opposed to being something employees dread. It's entirely on us in the compliance community to deliver our policies to staff in creative, engaging ways.

5. What will compliance training look like in 5 years?



IACOVETTA:

AI and machine learning will help compliance teams deliver compliance training in a way that **adapts in real-time** to the specific person taking the training. Machines will be able to account for the person's job role and scope, level, tenure. The depth of content coverage and difficulty of the training will adjust as the learner progresses through the training.

JAGIELLA:

Advances in **technology**, along with improved understanding of **adult learning**, will make dynamic, inspirational training the norm, not the exception. We will be able to make every training session an **engaging personal experience**.





VinciWorks

WE REFUSE TO TICK THE BOX



**VINCIWORKS IS ON A MISSION TO REINVENT THE
IMPACT THAT COMPLIANCE TRAINING CAN MAKE**

**In our business, it's not enough
to make someone aware of
risks. That's par for the course.**

We've got to change people's
behavior. That can be a pretty tall
order for a 20-minute course, but
day-in, day-out, that's what we
aspire to do.

We believe it's our duty to empower compliance
officers who are fighting the good fight. To turn
them into what they really should be - Chief Risk
Resilience Officers. By thinking big, and starting
small. By switching on one bored employee, with
one really relevant course. We're pulling out the
stops to turn compliance training from a
"necessary evil" to a "necessary good".

We see ourselves as warriors in a battle for hearts
and minds. Experts at switching people on to the
risks and pitfalls of today's commercial-ethical
minefield. We believe that risk must be relevant,
it must resonate and ring true. Embedding it in
the consciousness of a testy employee - that's an
art form, and one we excel at.



www.vinciworks.com