

Running in Place or Winning the New Race?

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By Carole Switzer

Last month my teenage daughter complained about a teacher who yelled at her for being on her phone while they were writing reports in class. "I was doing research!" she exclaimed. Last week, my husband noticed that she had left the instruction manual for something she was assembling on the kitchen table and chastised her for not following the directions. "I'm watching a YouTube video on how to put it together," she replied. Last night I asked her about the compliance training she had received at her part time job, and she said, "We had to spend half a day watching boring videos; I don't even remember what they were about." Today I suggested she call a college admissions office to get some information she needed, and looking at me like I have three heads, she said, "Why would I do that? I'll just tweet them."

That about sums it up, doesn't it? My generation of baby boomers is used to doing things a different way, but that doesn't mean our way is still better. Older isn't always wiser or more capable. As new generations are joining the workforce, age isn't the only thing that has changed. The differences in communication, learning, and management of information as we move from one generation to the next are more extreme than ever before.

When I started working as a teenage baby boomer, fashions and music were different than my parents' and their parents' generations, but the office workplace and how it ran was basically the same. Policies and procedures were kept on paper in filing cabinets. Team meetings took place around a table. Everyone worked at a desk. Supervisors were the font of all knowledge needed to do the job. This was all as true in 1970 as it was in 1920 for most office workers. The pace of change was slow for fifty years.

In my first job after law school in the early 1980s, we worked on basic "word processors" with some memory functions (well, our secretaries did), and there was no such thing as a fax machine or a computer database in the office. We did our research using books, and the new computerized case law search terminal was considered a modern miracle, even though it basically worked the same way as a casebook indices search; just faster and with less walking around in the firm library.

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Within a short ten years, we moved through several iterations of desktop computers, intra-office networks, and e-mail to laptops, cell phones, internet research capabilities, mobile devices, instant messaging, and social media. As companies began to put technologies in place to support core compliance processes in the 1990s, they thought they could plan and build out what they would need for the next twenty or thirty years. Oops.

Throughout the first part of this millennium, the pace of change continued to advance and it seemed as if every time we implemented something new, it was already out of date by the time we had it up and running. Some businesses felt like Alice, running as hard as she could just to stay in place during the Red Queen's race in Lewis Carroll's *Through the Looking Glass* and *What Alice Found There*.

For those who were born in the mid-1990s and since, the so-called "millennial generation," things are different. They have always been constantly connected by technology so they are comfortable sending text messages, listening to a podcast and looking up information online, all while working on a project. They use social media to connect with coworkers and collaborate on projects online, so they don't feel the need for phone calls or as many in-person meetings. They respond immediately to the "ding"

from their mobile devices when they get a notification of something.

Their comfort with technology and the ability to instantly look up whatever information they need, complete with comments and examples from peers and experts, makes them want searchable web-based collections of information or applications that are interactive and allow them to quickly focus in on what they want to see. Instead of remembering details of policies or procedures, they prefer

to find the snippet of information they need at the time they need it. They know they can learn independently but they want support and approval, so they prefer supervisors who are more mentors than instructors. They have superior knowledge in some realms, and they want to be heard and valued as part of the team, not treated like a fungible commodity.

Employers should be taking advantage of these preferences, not only because they engage employees but also because they present opportunities for more effective communication and management. We must offer searchable and interactive policies, push out notifications and inquiries, and deliver training at the point it is really needed.

I can't guarantee that what we design today will still be right tomorrow, in fact I'm sure it won't be—but if we take one lesson from the millennial generation, it should be to welcome change that makes us more connected and more capable. Adapting is what will let us stop running just to stay in place and allow us to win the new race and break through the looking glass to the other side. ■



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GRC Illustrated

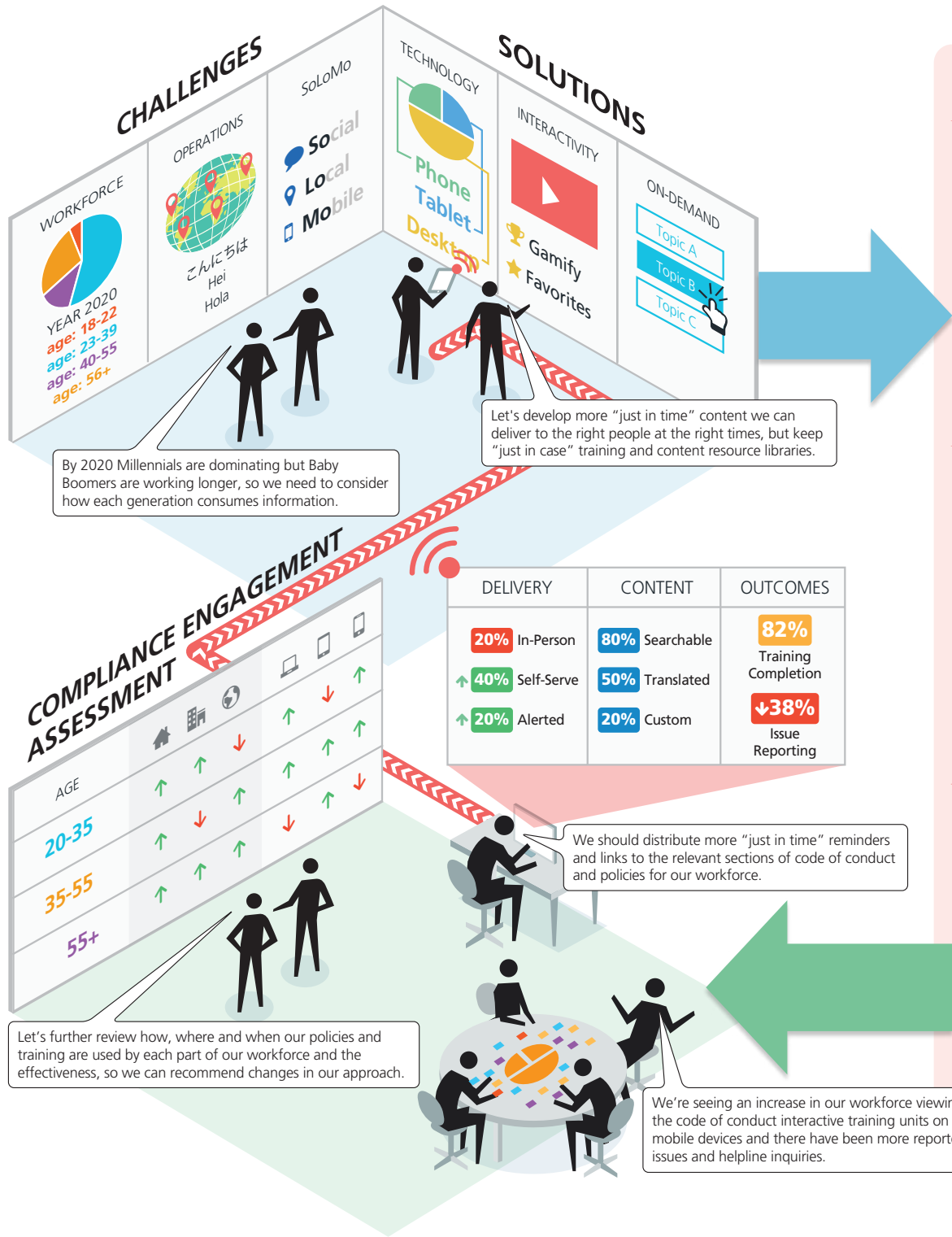
Engaging the Evolving Workforce in Compliance

The workforce is becoming more diverse by generations, geographies and cultures. People are working from scattered locations. The options for how we consume information are more varied than ever and a preference for short, easy to research and personally relevant content is on the rise. Compliance must evolve to keep up with these changes by offering interactive policy and training resources through a variety of mediums with access at the workplace and on the go.

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What's Changing?

Where we work

Changing work habits demand mobile access to policies, procedures and education when and where it is needed through:

- Web Based Portals
- Training and Guidance Apps
- Access and Communication Tools

Traditional Approach



Evolving Approach



How we consume information

Preference for shorter, more visual, and targeted information requires providing:

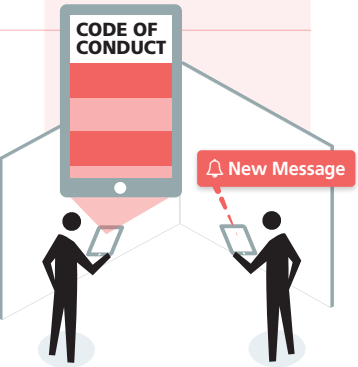
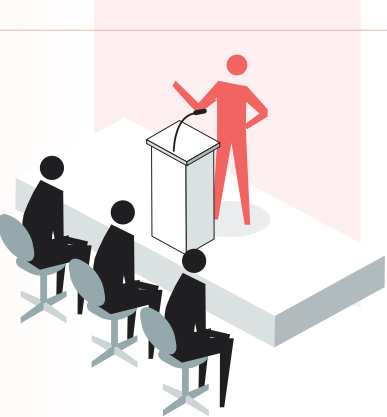
- Searchable content, policies and training units
- Information in small bites that link to more detail
- Short video lessons and scenarios



How we deliver content

Advances in delivery methods and understanding of how information is absorbed lead to:

- Customized content for different audiences
- Pushing notifications to targeted groups
- Enabling pull of information by each user as needed



[AN OCEG ROUNDTABLE]

Managing Compliance for the Evolving Workforce

SWITZER: We are seeing rapid change in the nature of the workforce today. What challenges does this present for compliance?

DE JUAN: A global, multigenerational, multicultural workforce means diverse preferences for how information is consumed and different levels of comfort with technology. Compliance managers must be able to securely deliver personalized, engaging, easy-to-consume content to employees and third parties. Rapidly evolving organizational structures due to increased M&A activities, constant movement of employees in, around, and out of organizations, and increased reliance on third parties are also big challenges. Compliance managers must ensure that their organization has accurate, up-to-date records at all times for all members of their compliance audience—regardless of who they are and where they are located—and an audit trail that tracks policy attestations and supports proof of compliance.

WARMACK: Not so long ago it seems there was one audience for compliance training, all with similar expectations and an uncanny ability to endure lengthy slide presentations. Now compliance officers must serve growing numbers within the workforce who consume information and approach issues differently, and have widely varying preferences of how the information is delivered. Our key challenges come in our reaction to these changes: to first ac-

knowledge and appreciate the diversity, then approach each of the emerging audiences in the manner that is most effective for them. The situation demands both a redesign of compliance training content, as well as a rethink of the compliance management tools necessary to ensure the right information gets to the right person and through the most effective delivery mechanism.

LIN: The continued increase in business diversity and workforce diversity raises the challenge of the already complex task of communicating critical compliance messages. While the new generation of employees has high expectations of their organizations' ethical and social standards, the entire workforce has shifted their personal information consumption patterns due to the overabundance of information available through multiple channels and devices. Compliance leaders must address the need for consumable information head-on, providing smaller bites of information balanced with the legal necessity.

SWITZER: Those entering the workforce use mobile devices for research and to communicate. How can companies use the mobile universe to address compliance needs?

WARMACK: The mobile universe creates tremendous opportunity for companies to reach the workforce in new and potentially more engaging ways. Gen-X and Gen-Y employees and managers want compliance programs that are

quick to consume and easy to digest while fostering feedback and social interaction. With mobile devices always at hand, compliance officers now have a delivery mechanism that reaches a growing number in the workforce to whom they can serve “just in time” training that is relevant exactly at the moment that an issue or question may be arising. The immediacy of information access and ease of communication fosters a workforce that is better educated and aware, which in turn lessens the risk of misconduct.

LIN: Mobility provides all of us unparalleled access to information, and that blurs the lines between work and personal time. For compliance leaders to gain mindshare from the workforce, we have to balance the traditional push of information, such as awareness campaigns, with elevating the desire to pull information.

DE JUAN: Companies should utilize compliance management software that facilitates mobile computing. With the right tools, companies can reach employees and third parties anytime, anywhere, and via any device and employees can more easily participate and engage in compliance initiatives. For example, with software designed for mobile devices, issues can be reported using mobile phones; tablets can be used to deliver policies, training, and other interactive content to employees without desktop workstation access; and mobile devices can be used to con-

duct investigations, audits, and compliance assessments in the field. When selecting compliance software, organizations should ensure that the user interface has been designed and optimized for the smaller tablet and mobile phone screens. Solutions that optimize the user experience across all devices can help foster engagement and participation in compliance programs and avoid user frustration and confusion.

SWITZER: There is both a need and an opportunity to change the way that information is curated and presented for different audiences. How should we be thinking about the style and approach we take toward codes of conduct, policies, and educational content?

LIN: In recent years, compliance leaders have been discussing this evolving challenge of changing information consumption patterns that has led to improvements in content style and presentation. The unmet opportunity is the timeliness of relevant information. When we visit news websites or present-day online publications, snippets of content are provided on a constantly changing basis, almost guaranteeing that content we see at 8 a.m. is different than at 10 a.m. the same day. While policy content does not vary nearly that often, what we promote and curate can be more dynamic. I believe compliance leaders have to be much better marketers to keep up with trends in content curation.

DE JUAN: We need to take into account the new ways that many audience members now consume information. For example, with the proliferation of social media, compliance information needs to be presented in concise formats that mirror the communication styles used in social media tools. Incorporating videos and graphics can also help to visually communicate concepts that may challenge culturally diverse audience members when presented in text-only formats. Users now expect an interactive and personalized experience, and this should be built into the presentation of compliance content. In addition, we need to address compliance audiences' differing comfort levels with using

technology. We need to provide content management and delivery tools that are easy to access and use, have simple user interfaces, and present information clearly and simply. For example, formatting all company policies in straightforward, standard templates can decrease confusion—so you now know what a policy should look like—and aid understanding. Automated notifications can alert policy audience members when updated policies are published and point them to an easily accessible, secure central location where they can find the most current versions.

WARMACK: Today's workforce now spans at least three generations: Baby Boomers, Gen-Xers, and Generation Y, who are also called Millennials. Baby Boomers typically are more comfortable with “just in case” policy training that presents a topic end-to-end in a single seating. Younger generations prefer, and increasingly require, “just in time” learning based on content available in short snippets and ideally delivered in YouTube-like, short subject videos. The essential point to appreciate is that compliance content must be effective for the individual, regardless of generational preferences. What works for senior executives probably is missing the mark with incoming college grads, and vice versa. Compliance must appreciate its range of audiences and adapt its approach to compliance training or risk missing a large segment of the workforce.

SWITZER: Both workforce and technology change are constant and seem to be moving at an ever faster pace, so how should compliance officers be planning for that future?

DE JUAN: Compliance silos will continue to break down, and processes and tools will need to facilitate integration and information-sharing across business units and functions. Mobile computing will become more and more the norm across organizations' ecosystems, and compliance officers need to be thinking about how to facilitate mobile participation while also protecting the organization. With new generations driving

adoption of more new technologies, there will need to be an adequate compliance budget. Compliance officers will need tools to help track program spend and justify their business case, and compliance activities will increasingly need to demonstrate ROI in order to ensure ongoing program support.

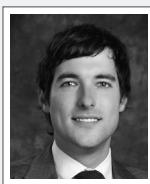
LIN: Change, and the speed of change, is inevitable in today's business environment. Between global M&A activity and the diversity of workforce skill sets and roles, compliance leaders will need to continue to fine tune targeted messages to smarter audiences. Marketing leaders have been facing and overcoming this challenge, using new channels like social media and compact messages to generate ROI. Compliance officers need to strengthen their relationships with marketing partners and improve their compliance marketing tactics to match workforce expectations. For example, website-based Codes of Conduct can enable dynamic content curation and provide metrics like page views, topic views, and time-on-page, which can further refine content curation to maximize engagement with the audience.

WARMACK: We must anticipate the inherent complexity that results from these changes and leverage automation wherever possible. Automation enables compliance officers to codify compliance best practices within business process workflows to ensure the right activities are happening. It enables the right content to be served in the manner that the individual prefers, thus increasing efficacy and retention. Technology also reduces problem-prone manual activities and saves time in analysis and report preparation, while simultaneously increasing visibility and executive oversight. It frees the compliance team from the mundane so they can concentrate on interpreting the effects of changes, reacting appropriately, and focusing their energies on developing better ways to engage the workforce. Automated workforce compliance management makes compliance repeatable, accountable, auditable, and ultimately more effective. ■

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