



**Building a stronger
culture of compliance**
through targeted and
effective training





Compliance training still challenges many compliance professionals. What is “effective” compliance training? How does one measure effectiveness? How can data derived from training be incorporated into ongoing monitoring for continuous compliance? This white paper will focus on **building a stronger culture of compliance through both targeted and effective training** and conclude with the board’s role in establishing a best practices compliance program.

Part 1: The importance of ongoing communications

Compliance professionals are often tasked with the challenge of keeping employees up to date on changing rules and regulations while also fostering a culture of accountability. To achieve this, it is essential to develop targeted ongoing communication strategies that resonate with diverse audiences and that drive compliance. Through a regular cadence of communication, utilizing various mediums and taking into account cultural nuances, you can ensure that your organization stays ahead of compliance risks and fosters a culture of trust and integrity. Here are the steps to get improved compliance through effective ongoing communication:

1. Establish a regular cadence for communications.
2. Develop customized messages for diverse audiences.
3. Utilize various communication mediums effectively.

1. Establish a regular cadence for communications

Establishing a regular cadence for communications is a crucial step in achieving effective ongoing communication in compliance. With the ever-increasing complexity of regulations, compliance professionals need to ensure that employees are kept up to date on new developments and requirements. A predictable pattern and schedule for communications can help to instill the habit of ongoing communication among employees and stakeholders, ensuring that they are well-informed and prepared to adhere to necessary guidelines. This regularity allows audiences to anticipate and expect updates, making it more likely that they will engage with and retain the information being shared. By maintaining a consistent schedule, compliance professionals can create an environment conducive for the organization to thrive in terms of meeting regulatory guidelines and staying compliant with the latest rules and developments.

Maintaining regular ongoing communication allows organizations to address the constantly evolving landscape of technology, data privacy, healthcare regulations and trading compliance challenges. Maintaining a consistent pattern for communications, such as sticking to a set schedule to create a pattern and habit for employees to follow, will help. It is also important to customize these communications across different mediums, using visual aids when appropriate to cater to the needs of different geographical locations, diverse employee profiles and varied cultural backgrounds. It is essential to establish a regular cadence for communications, as this fosters a culture of compliance and increases employees' understanding of the guidelines, expectations and best practices relating to their roles.

2. Develop customized messages for diverse audiences

Ongoing communication in compliance is essential for fostering a strong culture of adherence to regulatory guidelines and instilling the habit of continual learning among employees and stakeholders. With the ever-changing landscape of regulations in various sectors, it becomes increasingly important for compliance professionals to create well-formulated communication strategies that cater to the diverse needs of their audience. One crucial aspect of these strategies is developing customized messages that cater to the unique cultural nuances, roles and learning preferences of the different members of the organization. By personalizing the content, compliance professionals can ensure that the information is more relevant, engaging and impactful, resulting in more effective communication and, ultimately, better compliance outcomes.

You should focus on the importance of tailoring compliance communications to the specific needs and cultural contexts of diverse audiences, bearing in mind that the ever-evolving nature of technology, data privacy, healthcare regulations and trading compliance demands that compliance professionals consistently create and deliver content that truly resonates with their audiences. It is important to validate internal content with local audiences to guarantee the appropriateness and relevance of the materials.

3. Utilize various communication mediums effectively

Utilizing various communication mediums effectively is a crucial step in creating an ongoing communication strategy for compliance professionals. With the rapidly changing landscape of regulations, particularly in industries such as technology, data privacy and healthcare, it is essential to ensure that employees and stakeholders are aware of the latest requirements and guidelines. To achieve this, compliance professionals must adopt a diverse range of communication channels that cater to different audiences, geographical locations and cultural sensitivities. This includes not only relying on traditional methods such as emails and newsletters, but also embracing newer technologies and platforms, such as instant messaging apps, internal document repositories and videoconferencing tools. By doing so, the compliance professionals can ensure that relevant and timely information is disseminated effectively and efficiently, thereby promoting a culture of compliance and reducing the risk of non-compliance.

It is critical that you identify the right communication mediums to deliver compliance messages effectively. In promoting a culture of continuous communication, you need to maintain a regular cadence for communications to create a predictable pattern and habit. This enables the target audience to anticipate and be more receptive to the information shared. Moreover, you should tailor your communications to cultural nuances and appropriateness, particularly with regard to humor, alongside validating content with a local audience, ensuring that humor is presented effectively and does not alienate or offend the intended recipients.

For compliance professionals striving to maintain a seamless flow of crucial regulatory information, a strategic and robust communication plan cannot be undermined. By regularly engaging with stakeholders in a tailored manner, leveraging multiple communication mediums and staying attuned to feedback and cultural nuances, compliance professionals can ensure that their messaging is accurate, relevant and impactful. We encourage you to take these invaluable insights to heart and empower yourself to craft and refine communication strategies that will drive your organization toward compliance excellence.

Part 2: The value of targeted training

Next, we consider the value of targeted training. Navigating the complex world of international compliance requires a thorough understanding of regional regulations and a commitment to keeping your workforce informed and prepared. As a corporate compliance and ethics professional, it falls to you to create robust training programs that cater to the specific needs of your organization across various regions. Improved engagement and effectiveness of compliance training has significant implications on both personal and professional levels, ensuring that employees understand their responsibilities and the consequences of non-compliance. This guide will take you through the essential steps to enrich your training content, provide additional resources and establish a successful learning culture within your organization.

Targeted training is not just a buzzword; it is a necessary step toward improving engagement and effectiveness in our compliance and ethics training programs. By understanding our audience's needs, creating interactive content and measuring the impact of our efforts, we can significantly improve our employees' compliance knowledge and behavior, while making a commitment to prioritize targeted training in our strategies and achieve the desired results. Here are the steps needed to achieve improved engagement and effectiveness in compliance training:

1. Analyze regional regulatory requirements.
2. Customize training content for specific regions.
3. Develop engaging micro-learning modules.

1. Analyze regional regulatory requirements

Compliance training can be an essential aspect of the corporate landscape, ensuring that all employees remain up to date on the latest regulations and company policies. However, these training programs can sometimes be perceived as bland and as disconnected from the day-to-day activities of the workforce. This is why it is vital for organizations to analyze regional regulatory requirements and create targeted training that is engaging and relevant to their participants. By understanding the specific compliance concerns for each region, organizations can develop tailored content that effectively addresses the most pressing issues. This not only produces more meaningful training sessions, but also increases the likelihood of employees retaining and applying the acquired knowledge in their jobs. It is essential that compliance professionals tailor their compliance training to regional regulatory requirements and examine the distinct rules and guidelines for

each area in which the company operates and utilize this information to create targeted learning initiatives. By continually monitoring and updating training materials to reflect the evolving regulatory landscape, companies can ensure that their employees are equipped with the knowledge and tools necessary to navigate today's complex business environment.

2. Customize training content for specific regions

Customizing compliance and ethics training content for specific regional requirements is a crucial factor in ensuring its effectiveness. This approach ensures that the material is relevant, precise and engaging, leading to better retention and understanding among employees. Adapting the content to suit regional rules and regulations, customs and cultures ensures that employees are better equipped to navigate the challenges they face in their specific locations. Furthermore, it demonstrates the company's commitment to being culturally sensitive and respecting the diverse perspectives of its global workforce. Ultimately, this targeted approach fosters a more ethical, culturally aware and regulatory-compliant workforce, lessening the likelihood of legal and ethical breaches.

Targeted training is equally important in the global business landscape, as you should create compliance and ethics training content that caters to different regional requirements as well as varied risk-based areas within a company. For instance, sales teams would require training around conflict of interest while manufacturing teams would need training on health and safety regulations. Follow strategies including the creation of animated videos tailored for specific regions and languages, using native speakers to ensure the content is culturally sensitive and accessible to a wider range of employees. By adapting the content to the specific needs of your employees, you will foster a more comprehensive understanding of compliance and ethics across diverse global teams.

3. Develop engaging micro-learning modules

Developing engaging micro-learning modules is an essential step to create effective compliance and ethics training programs for employees. Micro-learning consists of short, easily digestible pieces of training content that employees can access and engage with at their own pace. Implementing micro-learning modules allows companies to address specific topics and target unique segments of their workforce, ensuring that employees receive relevant and timely information. This ultimately leads to increased employee engagement, improved retention of knowledge and a greater overall impact on the company's compliance program.

Engaging micro-learning modules can focus on such diverse topics as conflict of interest, anti-bribery and anti-corruption. These modules can also be culturally sensitive and translated into different languages using native speakers to ensure proper understanding and engagement for a global audience. Moreover, they tailor the content to target different risk-based areas in the company — for instance, sales teams may receive training on conflicts of interest, whereas manufacturing teams might focus on health and safety. By providing offline training options in various formats, such as PowerPoint presentations and PDFs, they further enhance accessibility and engagement.

For corporate compliance and ethics professionals, mastering the art of delivering engaging and effective training is crucial in fulfilling their obligations and safeguarding their organizations. These steps, ranging from regional adaptation and micro-learning to offline training formats and supplemental resources, provide a comprehensive blueprint for achieving the desired result. By adopting these strategies, you are laying the foundation for a solid compliance training program that not only keeps employees engaged but that also actively contributes to upholding the organization's ethical standards.

Part 3: Defining the effectiveness of compliance training

Next, we consider the always challenging topic of defining the effectiveness of training. The Department of Justice (DOJ) requirement for “effective” training is one of the most challenging areas for compliance professionals. Here are some of the key steps to get improved training effectiveness through micro-learning and metrics, steps that will resonate with people who have different micro learning styles:

1. Adopt micro-learning techniques for content delivery.
2. Utilize interruptive training methods for behavior disruption.
3. Tailor targeted training for at-risk employees.

1. Adopt micro-learning techniques for content delivery

Adopting micro-learning techniques is an essential approach for effectively delivering content to learners, particularly in the realm of compliance training. Micro-learning encompasses the practice of focusing on quick, digestible and repetitious bursts of learning that serve to reinforce essential concepts while being easily accessible to learners. This method deviates from traditional lecture-style and PowerPoint-led training and allows for an interruptive and integrative learning experience that caters to the needs of varying learners. Leveraging micro-learning as a tool for training purposes allows for a higher likelihood of information retention and eventual behavior modification, as it encourages individuals to reflect on their own learning patterns and apply the concepts in a more seamless way.

Utilizing metrics such as pre- and post-test scores and survey feedback to determine the effectiveness of training and tailor the approach accordingly should be looked upon favorably by government regulators. But this approach does require collaboration between the compliance and training corporate functions in this process. The adoption of micro-learning for compliance training holds significant importance, as it ensures that all employees have a comprehensive understanding of relevant concepts and principles. Given that this understanding forms the basis of an organization’s culture of compliance and ethics, it is crucial to ensure that the training methods employed are effective in communicating this information.

2. Utilize interruptive training methods for behavior disruption

One essential approach to keep in mind when implementing compliance training is the use of interruptive training methods for behavior disruption. Interruptive training takes the form of quick, simple and repetitious bursts of learning that are easily accessible and cater to different styles of learning. This approach allows for content delivery that is geared toward disrupting employees’ routine and thought patterns to promote engagement, behavior change and a deeper understanding of the material.

This approach can be especially beneficial for sending general compliance messages like anti-bribery or corruption communications to a broad audience. Both pre- and post-tests can provide useful metrics to determine the effectiveness of the training, while surveys can offer additional insights into how well the content is resonating with employees. In this way, interruptive training methods not only serve to catch employees' attention and disrupt thought patterns, but also allow for a more objective assessment of training success.

3. Tailor targeted training for at-risk employees

In recent years, there has been a significant shift toward more targeted and efficient training methods, particularly for at-risk employees. As a result, targeted training for at-risk employees ensures that they receive the specialized instruction they need, while also making it more likely that they will retain the information and apply it in their daily work activities. Even though there may be a need for longer, more focused training for certain employees who are considered to be more at risk, micro-learning can still be a highly effective tool for delivering general messages, like those related to anti-bribery. The interruptive nature of micro-learning allows it to be delivered in various modes, catering to the needs of different types of learners.

The importance of tailoring targeted training for at-risk employees cannot be overstated, as the consequences of compliance failures can be both costly and damaging to an organization's reputation. Ensuring that these employees have the necessary information and tools to act ethically and responsibly is crucial in promoting a culture of compliance and minimizing risk. Collaborative efforts between compliance and training departments are essential for developing and implementing training strategies that strike the right balance between targeted, in-depth instruction for at-risk employees and more generalized training for the broader staff. Ultimately, a well-executed and carefully tailored training program will lead to improved effectiveness and a more robust compliance culture throughout the organization. The usefulness of pre- and post-tests as a means of assessing training effectiveness have been noted, but surveys also have value in gauging learner feedback.

Alongside this, effective compliance training programs are critical for professionals in this field. The steps outlined above provide a comprehensive approach to building and sustaining a robust training strategy that not only engages your employees but also drives positive behavioral changes. From embracing micro-learning techniques and interruptive training methods to fostering collaboration between departments and reinforcing the message consistently over time, these steps can ultimately transform your organization's culture into one that values and prioritizes compliance. Seize this opportunity to elevate your training efforts and witness the remarkable impact on your organization as a whole.

Part 4: Training programs for third parties

We next consider how to put together a training program for third parties. In today's global business landscape, third-party compliance training is more crucial than ever. Ensuring that your organization's distributors, vendors and other third-party affiliates adhere to necessary regulations can minimize legal and financial risks, protect your company's reputation and foster a culture of ethical business practices. As compliance professionals responsible for training these third parties, it is essential to stay informed about cutting-edge strategies and techniques for effective risk management. Here are the steps to get improved third-party compliance training and due diligence processes:

1. Assess third-party risk during onboarding.
2. Utilize micro-training videos for efficiency.
3. Customize training materials for specific regions.

1. Assess third-party risk during onboarding

Performing due diligence and assessing third-party risk is not a "one size fits all" process. This critical step allows organizations to identify high-risk distributors, vendors and other third parties that may pose potential threats to the business in terms of bribery, corruption and other regulatory violations. By conducting a thorough risk assessment, organizations can effectively mitigate these risks and ensure that they are partnering with ethical and responsible businesses, ultimately fostering a strong culture of compliance throughout their sales or supply chain ecosystem. Moreover, such an approach is critical throughout the lifecycle of the relationship. The importance of proactive ongoing due diligence measures, such as automated screenings and monitoring, sending out attestations and conducting regular training courses, cannot be overstated.

Effectively educating resellers, agents, distributors and other third parties on compliance policies and expectations is critical. Providing proactive training not only helps in preventing compliance violations but also demonstrates to regulators your organization's commitment to maintaining high ethical standards. This, in turn, can mitigate penalties in case of inadvertent violations and foster a trust-based relationship with regulatory authorities. By adopting these practices and leveraging technology to automate certain processes, organizations can ensure that they are partnering with ethical third parties, minimize their exposure to regulatory risks and foster a strong culture of compliance across their entire network. By doing so, they not only protect their businesses from potential harm but also contribute to a more transparent and ethical global marketplace.

2. Utilize micro-training videos for efficiency

In the field of compliance, training third parties remains a critical aspect of managing and mitigating risks associated with regulatory and legal frameworks such as the Foreign Corrupt Practices Act (FCPA). With the increasing need for efficient and effective compliance processes, it becomes essential for compliance professionals to employ innovative strategies to achieve their objectives while minimizing disruptions to business operations. By leveraging this method, companies can ensure that their distributors and internal client gatekeepers receive consistent and easily digestible information, enhancing their understanding of compliance policies and expectations.

By breaking down complex topics into easily understandable portions, micro-training videos enable organizations to communicate the essential aspects of their compliance policies and expectations in a concise and engaging manner. Through the ability to cater to different audiences, these training resources contribute to a more comprehensive approach toward addressing third-party risk. The adoption of micro-training videos as a tool for third-party compliance education serves an essential purpose for compliance professionals. By incorporating this method, companies can enhance their third-party risk management processes and ensure that their partners are aware of the applicable legal and regulatory frameworks. This leads to improved adherence to compliance policies, reduced likelihood of violations and overall risk mitigation.

3. Customize training materials for specific regions

Effective third-party compliance training often involves the customization of training materials for specific regions. This ensures that the training is relevant, relatable and impactful for third parties, and that it takes into account regional differences, as well as differences in language and sensibilities. Customizing training materials also fosters a deeper and more nuanced understanding of the compliance policies and expectations towards each party, thereby mitigating the risks associated with inadequate understanding or implementation of compliance standards. Furthermore, cultural sensitivities and regional variations can be taken into account when designing training, ensuring a more engaging and effective learning experience for the target audience.

Micro-training video shorts can be easily customized for different regions and translated into multiple languages. With such versatile tools, compliance professionals can promote clear and concise messaging to their third-party partners, thus reinforcing the importance of compliance policies and due diligence throughout the duration of the business relationship. Customizing compliance training materials for specific regions not only makes the training more effective, engaging and relevant but also supports robust risk management and streamlined third-party due diligence processes.

For compliance professionals dedicated to training third parties, the effectiveness of your compliance and due diligence processes plays a significant role in safeguarding your organization from potential risks. The how-to steps discussed, including customizing training materials for specific regions, agents, resellers, distributors and other business partners on compliance policies and using technology to track irregularities, can greatly enhance your efforts to ensure that your third parties meet and maintain compliance expectations.

Part 5: The role of the board of directors

We conclude our review of training effectiveness with a broader look at the role of the Board of Directors in a compliance program. Navigating the complex world of corporate governance and compliance is a challenging but essential task for board members. Ensuring the company operates within the legal, ethical and social confines it exists within is a vital aspect of effective board governance. Boards that fail to achieve high standards of compliance can suffer reputational damage, financial penalties and even legal consequences. It is, therefore, critical for board members to engage with the importance of their oversight role and invest in the necessary education and best practices to ensure they effectively fulfill this responsibility. Here are the key steps:

1. Understand the Board's oversight responsibilities.
2. Establish strong communication with management.
3. Ensure compliance programs are integrated into the company's DNA.

1. Understand the Board's oversight responsibilities

Board members play a crucial role in ensuring the ethical standards, compliance and overall performance of a company. This means understanding a board's oversight responsibilities is of paramount importance to effectively govern and manage the organization. Every board has a fiduciary duty to protect the interests of the stakeholders and ensure the company's compliance with laws, regulations and policies. To meet this legal requirement, board members should be knowledgeable about current best practices, emerging trends, and the legislative and regulatory landscape, and be prepared to ask tough questions, follow up and support management in executing the company's plans.

There should be a healthy relationship between the Board and the Chief Compliance Officer (CCO). This entails the need for ongoing dialogue and frequent reporting by the CCO to ensure the Board is kept informed of the company's activities, risks and potential blind spots. Oversight committees should take a hands-on deep-dive approach to identify and address potential issues, making certain that the compliance program is ingrained within the company culture and business strategy. This means companies must find the right committee with the right people and relevant interests to oversee compliance and advocate for common membership across committees to ensure strategic integration and prevent fragmentation. For board members, understanding their oversight responsibilities is essential to foster robust corporate governance, risk management and compliance.

2. Establish strong communication with management

Establishing strong communication with management is a critical factor for an effective board oversight process. This key step entails board members working closely with senior management and the CCO to

ensure that all compliance-related matters are addressed promptly and accurately. By fostering a healthy rapport with management, board members can actively engage in the oversight process and be more proactive in remedying any compliance-related issues. This collaborative relationship between the Board and management is essential for companies to maintain compliance with laws and policies, ultimately safeguarding the organization's reputation and performance. Strong communication between the compliance officers and the Board is essential.

CCOs should develop close relationships with board members, much like other senior managers. This could involve CCOs meeting with board members outside of scheduled board meetings to discuss any concerns or potential issues. By doing so, a CCO can build trust and foster open communication, allowing board members to have a comprehensive understanding of the company's compliance efforts. The value of having the right committee and membership, which includes individuals with the background, interests and time necessary to effectively carry out their oversight duties is paramount. This key step is vital for board members because open and direct communication with management enables the Board to strategically address compliance matters, resulting in improved oversight and risk mitigation. Moreover, when board members have a strong rapport with management, they can proactively identify any issues and address them before the situation escalates.

3. Ensure compliance programs are integrated into the company's DNA

In successfully executing their compliance oversight duties, boards must ensure that their compliance programs are integrated into the company's DNA, or as the Department of Justice (DOJ) says, it's all about culture. Such integration fosters a strong culture of compliance, which is crucial in minimizing misconduct, reducing legal risks and protecting the organization's reputation. By incorporating compliance as a core element within the company's strategic planning, daily operations and employee training, boards can better manage risks and ensure adherence to relevant laws, regulations and policies. Further, a fully integrated compliance program will enhance overall corporate performance, customer trust and employee engagement.

For a board to effectively exercise their oversight duties, compliance programs should be tailored to the organization's business strategy, culture and resources. The relationship between the Board, senior management and the CCO can facilitate effective communication and better coordination in addressing critical ethics and compliance matters. It is crucial for the Board to ask tough questions and to dive deep into possible issues to ensure transparency and accountability. By embedding compliance within the organization's structural and cultural fabric, boards can create a robust environment that discourages misconduct while promoting transparency, accountability and ethical behavior. This ultimately safeguards the company's reputation, financial performance and regulatory compliance. Ensuring seamless integration of compliance programs is a vital obligation for boards, as this will enable them to effectively fulfill their oversight responsibilities and protect the long-term interests of the organization.

For board members, robust oversight and compliance, especially in a world where regulatory scrutiny grows more intense by the day, is essential. Through following these steps, compliance professionals can hone their understanding of the Board's oversight responsibilities, establish solid communication channels with management and embed a culture of compliance across their organization. Equipping yourself with these essential practices empowers you to tackle complex compliance challenges head-on and steer your organization on the path to success. As you continue to sharpen your oversight skills, you will foster a resilient compliance framework that safeguards both your organization and its stakeholders.



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