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Disciplinary actions as a springboard for training

by Solomon Carter

Solomon Carter (solomon@allpowermissions.com) is a corporate trainer specializing in curricula development and an executive at All Power In His Hands Christian Mission in Atlanta, Georgia, USA.

Using the disciplinary behavior of your staff is one of the best ways to formulate meaningful training. It not only serves as a remedy for past and present behavior but can forecast future trends in our aggressive efforts to mitigate risk.

Use analysis to identify patterns

Identifying disciplinary patterns within a division or companywide is one of the many things I recommend to mitigate risk. Generally, these kinds of trend analyses should be performed on an ongoing basis by your training division; because, as always, our best chance of thwarting risk is to train for its failure pre-launch. Ideally, anonymous disciplinary records should be forwarded to your training managers, at which time the team breaks them down into whatever categories fit your organization.

For instance, you may have categories such as:

- Misuse of funds/purchase card
- A failure to adhere to a specific process policy
- A significant lapse in your accountability posture
- A failure in compliance
- Equal employment opportunity/sexual harassment complaints
- Misuse of a company vehicle
- Incident(s) involving security guard at the front gate and employee(s)
- HIPAA issues

For your ease, I've mixed in a variety of incidents along with general categories as a guide, but your training department should be looking at everything. Also, who and how this critical assignment is completed depends on your staff, talent pool, and general makeup of your training team and organization. In some cases, I suggest a "SEAL Team Six" kind of approach, where you have a specialized group of people perform this function once a month or every quarter, depending on the size of your firm. In other cases, your talent pool and resources may dictate that everyone has a chance to work on these kinds of projects in a rotation, or maybe just everyone gets to do it all the time.

Additionally, you can break up the assignment into segments. One group identifies the trends, everyone provides input on why, and then another group focuses more on the training solution. This way, no one feels left out. But,

putting the interests of the mission must come first. It would be nice if everyone could get involved, but the skinny is, you only want your best and brightest to do this.

An example

So let's say you're in a very large organization, and over an 18-month period, you have 15 disciplinary infractions of staff misusing your purchase cards. In your analysis, no violations seemed to be nefarious in nature, but all were in clear violation of a written policy regarding the proper use of it.

A further review reveals that these policy violations were perpetrated by people spanning three countries, two continents, and three divisions. My initial thoughts would be that they're not all conspiring to violate that particular policy regarding purchases of less than \$300, so it may be something systemic.

When I have the team do a deep dive and start pulling the layers back, here's what we find:

- Most of the employees once worked in a particular division.
- As we review their training files, nine of them received training by or worked for a specific manager who has worked in many different areas. Four of them were trained by a former subordinate of that same manager.
- Of the 13 who received training by the manager and the subordinate, all gave the exact same excuse for the violation: "I knew that there was a \$100 limit on those kinds of transactions, but it's how we've always done it, so I just thought it wasn't an issue as long as we stayed below \$300."
- They were all hired before 2005.
- The last two employees appear to be complete anomalies.

Again, they're not all colluding to offer the same excuse. The concept of taking an extra \$200 liberty is cultural, because somewhere, whether they admit it or not, it's been repeated to them. And if they heard it, I guarantee you others have as well. And don't be surprised if, when we ask, the manager says something similar, because again, that unauthorized liberty has potentially become cultural and is prevalent to the point where the manager may have been told that incorrect policy by another boss as well. Poor information is the gift that keeps on giving, which is why outstanding communication is so important.

At this juncture of the investigation, you would know what needs to be done, perhaps companywide. At the very least, you'd send a strongly worded memo to your leadership and managers with a nice dosage of compulsion sprinkled on top and motivational training to properly introduce and reinforce the correct standard. If you wanted to take it a step further, you could have a sampling of your employees take an online quiz on purchase procedures, but here's the rub: To avoid waking them up that you're hyper-focused on their answers regarding purchase cards (at which time they may be more keen to answer untruthfully), introduce a cross-section of questions that have nothing to do with what you really want to know, and you'll have a greater chance of finding out what people really think about the thing you're researching. I mean, am the only one here who watches Game of Thrones? Lastly, a partial internal audit may be appropriate as well.

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