COSMOS
Navigate the Compliance Universe

Creating Great Compliance Training in a Digital World
3 Principle 3: Aim for Persuasion, Not Just Information

Information alone won't change behavior. How can you make your audience care?

What Does Advertising Know That We Don't?

There's no way around it: compliance is an information-heavy topic.

You can't just give people high-level principles ("We don't bribe") and hope everything works out. That would be like sending a new employee to work in a factory with a hard hat, earplugs, and a vague warning like: "Lots of heavy equipment—be careful in there!"

Often, there are concepts that need to be defined or explained. For instance, to teach bribery, you need to help learners understand that a bribe goes beyond handing someone a suitcase of money—and can include actions that are generous and well-intentioned, like donating the company's used computers to a local school.

(What could be wrong with that? Well . . . who benefits from your gift? Is your client on the board of the school? Is his wife? Does your gift help increase his standing in the community? Help support his re-election campaign?)

Then you have to help them understand who a foreign official is—since, in many cases, these people have jobs without an obvious government connection, like the head of a tourism agency or a professor at a dental college.

Even once you have the basics down, the best way to teach a topic can be a moving target. Back in the post-Enron days circa 2004, most of the financial integrity courses I wrote were about avoiding pretty obvious fraud, like cooking the books. But by 2014, after years of training, better internal controls, and more scrutiny, financial integrity courses tended to focus more on the gray area moves that employees had developed to get around the rules without (they hoped) fully breaking them.

Similarly, as regulations and enforcement change and develop, your training needs to change too. After the 2010 UK Bribery Act passed, barring commercial bribery of any kind, the entire compliance industry had to go back and update any bribery training that was focused only on government officials. After JP Morgan paid hundreds of millions in fines for its "sons and daughters" hiring program, companies wanted to mention that hiring decisions could be a type of potential bribe—even when the position was unpaid or the candidate was fully qualified.

So it's understandable that most compliance experts who put together a training program spend a lot of time thinking about what they want to tell people.

Unfortunately, as an industry, we've tended to spend very little time thinking about why people might want to hear it.

And that's a critical missing piece. When we simply push out information—no matter how good or relevant it is, and no matter how plainly stated—we lose a chance to position the topic in a context that our audience might care about or relate to.

And information alone won't change behavior. (Otherwise, every working professional would floss daily, exercise

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three times a week, and have fully-funded retirement accounts—since there's plenty of information out there about the benefits of those things.)

Here, advertising knows something that compliance is only starting to arrive at: Facts and logic have their place. But we're human, and so is the audience we're talking to. And sometimes we'll get better results if we take a break from trying to download all the facts and logic in our brains and just connect with people.

What Makes an Audience Think, Feel, and Follow Along?

Here's a thought experiment: What if compliance training was actually interesting?

What if you could make a compliance message that people would watch voluntarily, with no learning management system reminders, no mandatory completion rates, no stern warnings from their manager?

This isn't (just) a hypothetical. My company, Rethink Compliance, tested this theory in the spring of 2018 with some interesting results.

A few months had passed since the first of the #metoo allegations, and a broad swath of society was having a real-time, public conversation about topics like harassment, power, and consent. The tone had changed, probably permanently, and it was clear that our client companies were going to need a new way to talk to employees about their anti-harassment expectations.

In 2018, our industry was already familiar with the idea that compliance was also a culture challenge. But the process of rethinking credible harassment messaging took that challenge one step further.

After all, it's not necessary to master a lot of technical detail to get respect for others right. Managers don't accidentally harass their direct reports just because they don't fully understand the definition of *quid pro quo*. Harassment isn't an information problem—it's a people problem and a culture problem, and those are harder to solve.

In our view, employees on the receiving end of compliance training didn't need more information—they needed to be persuaded to see the topic differently.

So, in the hopes of taking a completely new angle on the topic, we teamed up with Gary Turk, a UK-based TV writer and comedian whose "Look Up" video went viral a few years earlier, eventually reaching more than 60 million views worldwide.

Gary doesn't come from the compliance world, and when we kicked off the project, he didn't start by asking us what message we wanted to communicate.

Instead, he wanted to hear about what it was about the topic that mattered.

Why should employees care if harassment happened at their companies? Who was in a position to do something about it, to take a stand against harassment? Who did it hurt if they didn't?

As he explained to us, his goal was to find the right emotional angle and the key pieces of information that would make people "think, feel, and follow along."

Ultimately, our collaboration resulted in "Don't Stand By," a three-and-a-half-minute video aimed primarily at bystanders to harassment.

It's available on YouTube (just search Gary Turk Don't Stand By) and, as of June 2019, it had more than 27,000

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views. That's the equivalent of every employee of Booz Allen Hamilton voluntarily watching it—for no reason other than that they wanted to.

Our conclusion?

There's nothing special about compliance that requires it to be boring. Anything that involves humans and human behavior can be interesting if you find the right way to approach it.

And if you go into compliance training with the goal of making it genuinely interesting, you might be surprised by what you achieve.

Compliance Meets Content Marketing

Let's talk about the very relevant field of content marketing.

Are you familiar with that term? I wasn't for a long time. In fact, I had probably interacted with many dozens of content marketing campaigns and was deeply familiar with the overall dynamic long before I knew there was a term for it or even really understood what was going on.

Content marketing is how the modern web is built. Think of it as a deliberate strategy of creating free, freely available, and deeply compelling content to attract people and then take them through a series of steps in which they are invited into a deeper and ongoing relationship—usually for an eventual profit.

Those pop-up boxes that want you to enter your email address for a free e-book? That's content marketing.

The 10% coupon code you get for joining a brand's mailing list? The offers to sign up for a free one-week email course on meditation, stretching, or dog training tricks? The invite-only Facebook page for the fashion coach or personal trainer? The free résumé analysis or macro calculator?

All content marketing.

Content marketers rise and fall on the strength of their, yes, content. They succeed only when they can regularly and reliably attract people's attention and keep them coming back. It's the opposite of (and maybe the antidote to) mandatory training.

Content marketing is one reason the web is so sticky: because the people on the other side of nearly every web page are deploying all their best tricks to draw you in and keep you there. Why? Because that's where the money is—whether directly, through product sales, or indirectly, through advertising dollars or affiliate links.

I was a target of content marketing for many, many years before I learned that there was a system behind all this. And, eventually, I set out to understand how it worked, in case there were any valuable insights I could bring back to compliance.

Now, a funny things about the modern web is that you can find MANY content marketers who write about content marketing.

In other words, they post lots of free, helpful content about content marketing . . . which is designed to pull you into an automated funnel so that you first get on their email newsletter list and then maybe commit to a short course or webinar before the system finally presents you with a pitch for a premium course about how to be a content marketer.

You can go down a few funnels like that to see how they work or you can buy a book about it, like *Epic Content*

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Marketing by Joe Pulizzi[1] (I did a little of both).

As Pulizzi explains it, content marketing is:

- . . . the ***marketing and business process***
- . . . for creating and distributing ***valuable*** and ***compelling content***
- . . . to attract, acquire, and engage a . . . ***target audience***
- . . . with the objective of ***driving . . . action***

Now, this seems highly relevant to compliance, does it not?

I mean: Creating valuable and compelling content to engage a target market with the objective of driving specific action? **That's the mission of compliance training in a nutshell**.

Here are some other things I learned from Pulizzi:

1. Content marketing requires that you start with what matters to your audience, not what matters to you.

On the internet, engaging with any content is highly voluntary. If you don't like what you're seeing, you can click away in an instant—there's always a world of cat videos and someone else's content marketing to move on to.

To write valuable and compelling content that gets people to stick around, you need to start with what matters to your audience, not to you. As Pulizzi puts it: "Content marketing is thinking about the target audience's needs first."[2]

Because you want the audience to welcome your communications, and to keep coming back for more, your content needs to be unique, relevant, and useful—for THEM.

"That's the difference between content marketing and the informational garbage you get from companies trying to sell you stuff," Pulizzi explains. "Companies send out stuff all the time; it's just that most of the time informational garbage is not very compelling or useful."[3]

Not all content marketing techniques are right or workable for compliance programs, but the overall concept offers an intriguing mindset:

Is a lot of compliance training just "informational garbage"?

What would happen if we started with the assumption that we needed to create content that people would look forward to receiving?

Might we try harder to figure out what our audience liked or responded to about our topics, along with what they might find practical, useful, or even just entertaining?

2. If you can win your audience's trust, it's possible to become a go-to informational source.

As a post by the Overthink Group puts it, "Good content marketing is the art and science of helping people make better decisions . . . and fall in love with your brand along the way."[4]

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(In the case of compliance, the "brand" might be something along the lines of "doing business right.")

The Overthink Group's term for the "content" in content marketing is "Free Helpful Stuff."

In a typical content marketing transaction, a company or website gives away lots of genuinely valuable content as a way to build trust and invite the reader into a relationship. It's one that is commercial, yes, but goes beyond the commercial or transactional to something more trusting.

"Free Helpful Stuff." I love this formulation, because when was the last time *anyone* made a big deal of out compliance being "free"?

Free implies that it's good enough that people would pay for it—which is crazy, right?

And yet, in a world where people hire Instagram coaches, diet coaches, and executive coaches, is it so crazy to think that an ambitious person, who is working hard to grow a career, might pay for advice—from experts and attorneys—to navigate the ethical and legal considerations that come with their jobs?

After all, the compliance program isn't free. Our salaries aren't free. The online courses and communications we send out aren't really free to create.

Is it so crazy to think we could position them as a value-add?

Rather than a "sorry you have to take this mandatory training, but it's required"?

Let's go even further: Is it possible to imagine a way to position compliance as a company *benefit*?

Like: As a company, we have certain values that matter to us, and these are so central to who we are and how we work that we've hired an entire team of experts whose **full-time jobs** are to help you work in line with these values.

When you put it this way, isn't it kind of mind-blowing that every major company you've heard of has a group of full-time professionals who go into work every morning with the goal of helping employees know about their ethical and legal responsibilities, so they don't get tripped up?

It's like a corporate wellness program for ethical decision-making!

If compliance programs didn't exist, isn't it possible that millennials—who, studies show, WANT to do purposeful work for a company that that makes a positive impact and has strong ethics/values[5] —would have invented them?

Compliance programs do exist, so we will never know, but I find it to be a useful thought experiment: What specialized expertise do we have in compliance that at least some people might pay for, or see as highly valuable, provided they could see the direct connections to their careers and their lives?

Content marketing helps you become a "center of gravity" for your audience on a particular topic.

Where can you be a "center of gravity" for your employee audience? Where might they want you to be?

3. Once your audience trusts you, you can start to influence their behavior.

Being able to cultivate a relationship with your audience is powerful stuff.

The content marketing dynamic is meant to build a high-trust relationship with someone who provides

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information and guidance you don't get anywhere else.

As Pulizzi says: "If you deliver vital, relevant content to your target market, you will take on an important role in their lives."[6]

And the entire reason it works as a marketing tactic is that once people trust you—once they feel like you understand where they're coming from, you're invested in their success, and you have useful guidance that will make their lives better in some way—you can suggest that they do something . . . and many of them will.

If content marketing works for political campaigns and American Girls dolls, why wouldn't it work for something far more central to the life of the average professional—the ability to keep their career on the right track?

Pulizzi opens his book with a quote from Dwight Eisenhower: "You do not lead by hitting people over the head. That's assault, not leadership."[7]

While Pulizzi doesn't specifically explain why he chose this quote, to me it suggests that content marketing done well is a form of leadership.

You show people they can trust you. You show that you're familiar with what matters to them. And you show that you have information that's directly relevant to them.

That's a firm foundation for influence—for being able to suggest a course of action and find a receptive audience.

But, notice, you have to lay some groundwork to get there. If you just show up and start barking orders, people will think: "Who's this jerk?"

Once that groundwork has been laid, the content marketing "call to action" is usually an immediate ask: Click on this button. Give us your email address. Click here to purchase this course now.

Or: Register to vote. Click the donate button. Show up at this rally.

One challenge compliance faces is that our calls to action can be a bit more nebulous and further in the future:

Understand these concepts and watch out for situations where you might need to know them.

But it doesn't mean we should abandon the concept altogether. We just have to get more creative.

For instance:

- Think about the enrollment emails you use to launch your courses. Are they long and boring? What if instead of doing that, every word in that email was designed to compel your audience to click on the course and take it immediately? How would that change what you sent?
- Think about the way your courses typically end. Do you give people one or two concrete actions they can take today to prepare themselves in case they encounter this risk in the future? If you did, what would that look like? Maybe you could ask them to visit the policy resource center on their phones and bookmark it, in case they need to find it quickly in the future. Maybe you could ask them to download a PDF fact sheet about reporting and save it to their computer, so they have the information in case they need it.

Even though the overall message of a course might be bigger than one or two takeaways, you may be able to find specific calls to action that support your larger goal of awareness and behavioral change in this area.

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Content marketing might be new, but the reason it works is not.

A few years into Rethink Compliance's growth, it dawned on me that we were really a professional services firm and not a product company. Clients looking for great, engaging compliance training that really matched their risks, audience, company, and brand needed a deeply consultative approach—not just from the project manager, but also from our creative team and compliance advisors.

I mention this "aha moment" to bring up a really insightful book I read around that time called*Managing the Professional Service Firm*. The book was published in 1993, long before anyone had coined the term "content marketing" or sold a course on the internet.

And yet the author, consultant and Harvard Business School professor David Maister, describes a similar dynamic in the best way to sell and market professional services companies—namely, that you have to provide a lot of value, establish your expertise, and build some level of trust with your audience FIRST, before you even try to make a sale.

As Maister says, related to marketing:

> Marketing tactics that illustrate one's competence (such as speeches, seminars, and articles) are infinitely more powerful than those which assert it (such as brochures, direct mail, and cold calls to "let me tell you more about our firm.")[8]

Good speeches, seminars, and articles provide value before asking for anything from the audience. They show the audience that you know the problem they're trying to solve and you might be qualified to help.

Maister promotes a similar value-first, high-trust approach to sales, explaining that most buyers of professional services are reluctant buyers who are worried about making a mistake:

> The only way to influence me is to find out what I want and show me how to get it. I hate to be sold, but I may be willing to buy, if you can show me that I . . . have some problems to solve and some opportunities to capture.[9]

I have found Maister's insights to be helpful in thinking about how best to approach the compliance industry — both when it comes to selling compliance products to companies, and again when we think about "selling" compliance concepts to employee audiences.

Those of you running compliance programs have complex, high-visibility projects to tackle. You want to know that you are talking to a capable and trusted partner—someone qualified who understands your interests and will work to help support your goals.

It often takes a number of conversations to get to a point where our buyers are comfortable moving forward—as it should. This is not a field where you throw up a webpage with a "Buy" button and let the orders roll in.

And what's true of the compliance buyer is also true of the compliance audience: They're wary of giving you too much time and attention before they've bought in, before they know that you have their best interests in mind.

Taking a content marketing approach to this reluctant audience can open up a new angle on things.

In content marketing, you want to provide your audience with something (of value) that no one else is providing and position yourself as a trusted authority with genuinely helpful information to share.

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This is what elevates brands from a commodity to something people embrace. And if it works for soup, why not for compliance programs?

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