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Navigate the Compliance Universe

Creating Great Compliance Training in a Digital World Resource Guide 3—Six Things I Wish I Had Known about Compliance Training When I Started

By Michele Abraham

I've been involved in designing and deploying compliance programs since 2008, when I first joined The Timken Company as a compliance attorney. Today, I'm the Director of Ethics and Compliance and the Associate General Counsel at Cooper Standard.

When I look back on the early days of my compliance career, I can think of six things I wish I had known about designing and deploying corporate compliance programs.

Getting these elements right has been a critical part of building successful programs, both at my former company and in my present position.

1. The Importance of Audience Segmentation

If you're looking at a manufacturing environment, there's a distinct difference between someone on the shop floor and someone in manufacturing leadership. Similarly, there's a difference between your sales force—who are mobile and not connected to a traditional desk—and folks who are in the office every day, all day.

As you sit down to plan your training, it's important to segment your audience based on risks and roles.

Not everyone needs training on anti-bribery/anti-corruption or conflicts of interest. So you'll want to divide your audience into groups and try to tailor your curriculum to the people who really need to know about a topic. Once you know who will be taking a course, you can customize the course to include examples that will be relevant to them.

At the same time, don't overdo it! When I first started, I hyper-customized and hyper-segmented our program. It was much too granular, especially for an online format. For one topic, I had Finance, Legal, and Communications getting one training and Purchasing and Supply Chain getting another. It was too much.

With instructor-led training, where you are actually going to be talking to people in-person, deep segmentation can be important. But when you're working with a learning management system (LMS) and employee data, and you're trying to segregate the data into a reasonably-sized audience that you can reach with an online training, it's just not realistic to go too far.

As you plan your audience groups, make sure there's an overall message in the training that's relevant for your audience members along with a key takeaway for their jobs.

Compliance training in general can suffer from a lack of clear takeaways. We get caught up in trying to teach a subject and fail to tie it clearly to our audience. Think about training as an action item. When it's complete, it should change how your audience does their job.

How can you know if you've gotten too complicated with your training plan? If you can't easily describe who you're trying to target and what you want them to do as a result.

As an example: When I talk to the board about the upcoming year, my training and communications plan for the Operations audience will address three topics, all of which will be delivered by the plant manager. Similarly, all salaried employees and everyone with network access will be trained in four topics online. Finally, we'll supplement that with instructor-led anti-bribery training for the sales and marketing teams.

That's the whole training plan for a year. And if you're not able to talk about your plan that way, then you've likely gotten too detailed and too complicated.