

## Compliance Today – August 2022

### The emperor's new clothes: What's your attitude about training?

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By Calvin London, PhD

Calvin London ([calvin@thecomplianceconcierge.com](mailto:calvin@thecomplianceconcierge.com)) is the Founder and Principal Consultant of The Compliance Concierge.

- [linkedin.com/in/calvin-london-36a57311/](https://www.linkedin.com/in/calvin-london-36a57311/)

I don't know how many of you are familiar with the Hans Christian Andersen fairy tale "The Emperor's New Clothes." It is about two swindlers who arrive at the capital city of an emperor known for excessive spending on lavish clothes at the expense of state matters.

Posing as weavers, they offer to supply him with magnificent clothes that are invisible to those who are stupid or incompetent. The emperor hires them, they set up their looms, and they go to work. Many of the emperor's officials and the emperor himself view the progress, and although none of them can see any clothing being made, they all pretend that they are the finest clothes they have seen.

When the swindlers finally announce the clothes are finished, the emperor organizes a big procession to show off his fine new clothes. All the people look on in amazement, none of them wanting to call out that, in fact, he has no clothes, until a child blurts out that the emperor is wearing nothing at all. The people then realize that everyone has been fooled, and although startled, the emperor continues the procession, walking more proudly than ever.

Few people will admit to liking compliance training. Management of companies more often than not see it as a necessary evil, yet it is one of the essential components of any compliance program. Is your company like the emperor's town, not wanting to admit that you do training mostly to tick it off the audit requirement list?

Where does your management sit on training?

### Training for the sake of training

I have written previously about the potential saturation of employees with mandatory "read and understand" training and how it has a real tendency to lead to noncompliance.<sup>[1]</sup>

Consider the following example; how much can you relate to it?

*Tom has just started a new job with a big pharma company. He is feeling really frustrated because he seems to have spent his whole first month doing nothing but "read and understand" training and still has 87 modules outstanding. His boss is starting to get a bit frustrated because Tom is not performing as he would like him to in his new role. Tom's frustration continues because he no sooner gets rid of all the standard operating procedure (SOP) and policy training when more seem to pop up. He is sure that he has seen a lot of these just a few months prior.*

*Four months later, he is doing really well in his job. He knows all the processes and procedures now but struggles with the concept of why he needs to have revision training on SOPs for the smallest of changes and why he needs to know about detailed processes that relate to other functions.*

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*Once again, Tom starts to struggle to keep up. His job has become more demanding, and he just does not see the sense in being trained on SOPs and policies that he understands—he uses them every day!*

*He finds it hard to reconcile why he has to keep going through retraining for all these changes that are hidden in the document and why he has to do these tests that are more about tricking you than assessing your understanding.*

*On the advice of several colleagues that Tom is friendly with, he starts to make copies for later reviews and sign-offs that he has read and understood the training just to get them out of the way.*

This pattern develops and becomes embedded into the training culture in far too many companies. It gets even worse when the standard response to an audit observation is, “We will retrain people,” knowing full well that this is the easiest and least time-consuming response to make the observation go away.

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