

Compliance & Ethics Professional

November
2014



A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

www.corporatecompliance.org

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Director of Compliance for the
National Security Agency
2009-2014

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Compliance training: Is it just about information?

“**T**hey don’t need the compliance training; they already know this stuff.” If you hear this, what do you do? Assume (but be very skeptical) that they do already know that price fixing, bribes, and fraud are illegal. If employees know the facts, is your job done? Is the purpose of the training just to be sure that those who might get into trouble know the rules? Is the way to prevent violations of law and unethical conduct just to give employees information about the rules?



Murphy

Education certainly includes transfer of information, but there is more to it. Compliance training also plays a crucial motivational role to help lead people to do the right thing. Consider the big corporate scandals. Did the people in these cases already know bribery or fraud was wrong? Here’s a good guide: If people hide and cover up conduct, they know it is wrong. If one looks at the high-profile cases, one finds scant evidence that knowledge was the issue.

In compliance and ethics, an essential objective of training is to convince people that the subject is important, and that they should commit to doing the right thing. This is more than knowing about the law. It is picturing the consequences—prison and fines—from breaking the law. But effective training will also go deeper than this to appeal to employees’ values and sense of right and wrong. Training needs to bring the reality of misconduct home in a personal way. If

products cause harm, employees need to see that from a personal perspective. They may need to think about how they would explain violations of law to family members. They may need the painful mental picture of what happens to those who break the rules. They may need to see that the company genuinely believes in its values, and that these values are shared by management and their peers. Good training will give employees sharp mental images that will last.

Experienced compliance and ethics trainers also know that training serves another important purpose – it surfaces questions and concerns from employees throughout the company. Onsite training is almost a form of compliance auditing. The issues raised may include a report of violations by a supervisor during the anti-trust training (an experience I had personally) or an ethics concern not covered by the training but triggered by the presence of a compliance person in the training room. Those doing the training typically learn important information from these training experiences that provide valuable input for the overall compliance program.

Training is not just the simple transfer of information. It also motivates employees and provides insight to those doing the training. Training is a big job, if you want to do it right. *

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