ethikos Volume 33, Number 10. October 01, 2019
Sound Bytes, Training Shots, and Memory Joggers

By Calvin London, PhD

Calvin London (calvin@thecomplianceconcierge.com) is the former head of Business Operations and Integrity for Celgene Pty Ltd. in Australia and New Zealand.

Who would have thought that something I did for fun when I was studying at university would become a concept for training and education in compliance?

When I was at university, I played in a band. We didn't do too badly and, for a while, had a regular gig at one of the local hotels. Alas that big recording contract never came, so I ended up in compliance. We did, however, get to experience recording when we cut a demo tape. During this process when you take a break and you come back, you do what is called a "Sound Byte" (adapted spelling!). This is a short run through a couple of riffs in a song to test the different sound levels and get balanced.

When I was reminiscing about this a couple of years ago, it set me off on a theme to come up with a series of short, sharp in-the-moment training scenarios, which we now call Sound Bytes, "Training Shots," and "Memory Joggers."

## Change the attitude and the rest will follow

Few employees like compliance training. A large percentage of employees would agree with this statement. Yet it is one of the essential components of any compliance program. What I am finding, however, is that in our company at least, people are changing their views on this statement. Why?

Because we are changing our attitudes in relation to training and listening to people's complaints—that they get too much training that is not focused.
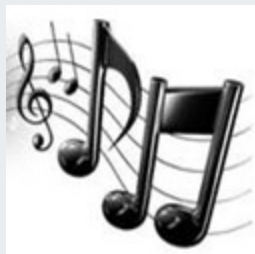
I have written previously about the potential saturation of employees with mandatory read-and-understand training and how this has the potential to lead to noncompliance.[1] With a little bit of lateral thinking and innovation, it is possible to impart the same message and principles as reading through a policy or process, but in a more relaxed and condensed fashion that is also more acceptable to employees.

The Sound Byte process

We have applied the concept of the Sound Byte to support compliance initiatives that we have introduced. For example, I have discussed previously the introduction of a speak-up campaign.[2] During this campaign, Sound Bytes reminded employees about the value of speaking up and helped to keep the campaign fresh and alive. Below are two examples that we used.
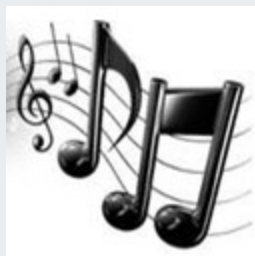
	Your voice defines the value you bring to the organization.
	Companies become ethical one person at a time, one decision at a time.

Sound Bytes were sent out by email to all employees and were not compulsory *per se*, because they depended on the employee opening the email. We have used these to deploy relevant quotes, provide discussion on scenarios related to compliance issues, and release updates on compliance initiatives such as the speak-up campaign. The important aspects are that they are short, sharp, and easy on the eyes. Regarding the latter, it is often more effective to put these on a relevant background: an incoming storm as a backdrop for change, a winding pathway to express a journey, for example. These are visually more appealing than just a statement.

When a random selection of 30 employees were surveyed 12 months after the initiation of the Sound Bytes, 87% (26/30) indicated that they thought Sound Bytes were valuable, and 90% read them at least on occasion. Sound Bytes were issued every month to keep the issue current but not overload employees. In terms of timing, 83% (25/30) of employees from the same survey group indicated that this was a good frequency. An additional 10% indicated they would like to see them more often.

Training Shots and Memory Joggers

Along the same theme, short, sharp shots of training statements for policies or procedures (Training Shots) can also be beneficial in the learning process. Below are two examples of Training Shots.

	What is an Ethical Culture? (Select the incorrect answer)

1. A culture that recognizes as the primary interest the responsibility to protect the financial interests of shareholders 2. A culture in which ethics and ethical behavior are open topics of discussion 3. A culture which evaluates itself on its ethical behavior 4. d. A culture that allows all employees to freely speak up	**Answer A** Although the financial interests of the shareholders are important, this should not be placed above the business operating in an ethical fashion. Failure to operate ethically could have serious consequences for the company and could have a long-term effect on the financial interests of the shareholders.
	A Code of Conduct shifts the emphasis of a compliance program to the values and ethics of the employees and how they put the policies into action.
True or False	**Answer: True** The expression of principles through an ethical culture needs a powerful message that an organization intends to operate within a culture of compliance and that the organization and its employees achieve these standards following the highest ethical behavior.

Training Shots are particularly useful to review or refresh important aspects of a policy or process. As such, when deployed through an electronic portal and the answer to the question requires input from the employee, Training Shots can act as a form of assessed training. This in turn can be counted as ongoing refresher training if structured correctly.

Memory Joggers are a similar concept to Training Shots or "Moments of Truth," which have previously been discussed.[3] Moments of Truth are used to challenge the ethical behavior of employees by presenting them with practical examples of when and how to apply guidance documents such as the organization's code of conduct. The difference with Memory Joggers (as shown in the two examples below) is that they express a fact or statement and do not require input from the employee as is the case with Training Shots and Moments of Truth.

Why have a Code of Business Conduct and Ethics

- Demonstrates a strong commitment to compliance and ethics.

- Emphasizes that compliance and ethics are good for business.

- Summarizes the key principles of corporate policies.

- Reminds us that compliance and ethics are "Everyone's responsibility."

- Protects our company.

- Raises awareness on promptly reporting concerns and misconduct.

You are expected to:

Maintain confidentiality and avoid conflicts of interest and disclose any potential conflicts of interest that you become aware of.

Mix it up and be innovative—your employees will love it

In this article I have tried to provide three alternatives to the process of read-and-understand training that are not only more accepted by employees but also are more effective for retention. Although each of the alternatives—Sound Bytes, Training Shots, and Memory Joggers—share common themes in that they represent in-the-moment training and are short, sharp, and easy to do, they can be linked to more subtle and subliminal messages. For example, keeping Sound Bytes and Memory Joggers as factual statements, employees recognize these will provide information at no cost to them. They are forms of education that could be running on a banner across a web page or in a loop on a TV screen, such as we did in our office.

Training Shots become recognized as an (attractive) alternative to gain recognition for refresher training that does not involve the repetitious reading of the same document. The latter can be ineffective and lead to noncompliance when employees assume that because they have already read a policy or procedure once, they do not need to repeat the exercise, which may cause them to miss important updates to the policy or procedure. Updates can, for example, be in the form of a Training Shot that provides the appropriate focus on the changed element of the policy or procedure.

By providing alternative modalities to training and education, your training program will be vibrant and more appealing. This in turn will lead to more effective training, and employees will realize that it adds value without the considerable time investment on their part that is demanded by other forms of training. After all, variety is the spice of life, and compliance training should be no different!

1 Calvin London, "Training *foie gras*: Problems with modern-day training," *CEP Magazine*, July 2019, 50-52, http://bit.ly/2Xi6pYY.
2 Calvin London, "Getting to a functional 'Speak up' culture," *ethikos* 33, no. 6 (June 2019), http://bit.ly/2Xis4An.
3 Calvin London, "Moments of Truth: Educational tools for codes of conduct training," *ethikos* 33, no. 8 (August 2019), http://bit.ly/2m5mLas.