

The Complete Compliance and Ethics Manual 2023

Considerations in Compliance Education Program Development

An effective compliance education program is a key part of having an effective compliance program. As you plan your annual compliance education program, here are some factors that should be taken into account. Modify and adjust this document as needed to fit the specific requirements of your organization. You will also find a sample planning chart for an annual compliance education plan for your use below.

| Factor | Task | Person Responsible | Action Plan | Completion Date |
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| Risk-Based Education Program | Identify compliance risks the organization encounters in its operations and create a compliance risk catalog that includes specific risk drivers and risk events. | | | |
| | Identify the organization’s top risks by assessing the likelihood, frequency, severity, and impact of the risk events identified. | | | |
| | Identify the laws, regulations, and policies governing the top risks. | | | |
| Determining Specific Learning Objectives | Define specific learning objectives to address the identified risks and governing requirements. Each education course should have objectives relating to the reduction and mitigation of the organization’s top compliance risks. | | | |
| | An objective of all compliance education should be to create and reinforce a culture of compliance within the organization that enhances ethical decision-making and speaking up. | | | |
| | There should be objectives relating to providing employees with an understanding of the laws, regulations, policies, procedures, and controls applicable to their roles in the organization. | | | |

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| | Consider whether you should have objectives related to changing employee beliefs or behaviors in connection with certain compliance risks, especially those areas in which past compliance violations have occurred. | | | |
| | Consider as an objective the ability of employees to demonstrate a deep understanding of a particular subject matter by successfully applying their knowledge to new situations or a different set of facts. | | | |
| Selection of Target Audience | Some education courses should be appropriate for a broad audience, including all employees, especially those related to reinforcing psychological safety, the importance of speaking up, and those providing information about the compliance program, tools, processes, and systems (e.g., where to find the code of conduct or how to reach the compliance helpline). | | | |
| | Consider targeted training about specific compliance risks for an audience that includes only those employees likely to encounter such risks in their job duties. (e.g., Training the local employee cafeteria staff on anticorruption is likely to have little value as opposed to training salespeople involved in direct negotiations with foreign government officials.) | | | |
| | Are there groups of employees within the organization that require specialized knowledge and expertise to do their jobs that other employees do not? How will you address the specific education needs of that audience? | | | |
| | Are there specific regulatory requirements related to education and training for certain types of employees in your organization, and if so, how will you ensure these requirements are met and this limited audience is identified? | | | |
| | Consider whether third parties need to receive educational courses, and determine how that can best be accomplished. | | | |
| Format/Modality Considerations | Some employees have visual learning styles, while others may have auditory or experiential learning styles. Consider offering the same educational content using multiple different methods to accommodate different learning styles. | | | |

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| | Consult with diversity and inclusion experts to ensure educational content is equally accessible to all members of the target audience, taking into account differences in languages, educational background, and differing physical abilities, among other factors. (e.g., If your education courses are only presented in verbal form, how will persons with impaired hearing obtain access?) | | | |
| | Consider in which format the educational content will best be learned. For complex topics where the ability to ask questions and interact with the presenter are important, is travel feasible such that live educational sessions are possible? Can the material be understood well when presented passively through an online course or using a recording of a live session held previously? | | | |
| | Consider creating a searchable compliance education resource library to enable employees to obtain additional educational materials on demand. | | | |
| Content Considerations | Are there existing compliance education materials available that address the objectives you have set? If not, are there outside sources for the type of content you need, or do you have the internal expertise needed to develop your own content? Should you use an outside party to create customized content for you? | | | |
| | Ensure educational materials are made available in the native languages of all persons included in the target audience for each course. | | | |
| | Ensure educational materials are appropriate for the target audience. Ask employees familiar with the local culture and language to review educational materials in advance to ensure they are not unintentionally offensive or inappropriate. | | | |
| | Ensure educational content is reviewed and approved by appropriate stakeholders for your organization prior to launch (e.g., subject matter experts, legal counsel, the compliance committee, chief compliance officer). | | | |
| | Are there complex topics for which learners need to obtain an understanding of foundational concepts first before continuing on to more advanced aspects of the material? If so, a phased and modular approach to presenting the material in multiple sessions over time will likely work best. | | | |

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| | Consider whether different employees need different levels of detail in their educational content. (e.g., A general overview of conflicts of interest may be appropriate for most employees, but purchasing employees may need more detailed and complex content due to their job function.) | | | |
| | All compliance education courses should include information about how to ask questions about the content and how to obtain additional information (e.g., through your compliance helpline). | | | |
| Consider Education Burden | Timely completion of education courses is important, but consider that others in the company may perceive time spent on education as time “taken away” from performance of other job duties. This may be especially true for employees working on a manufacturing line. | | | |
| | Consider education programs planned by other functions in the organization to minimize overlap and excessive education burden. (e.g., If your company’s safety team is planning five hours of mandatory safety training for every employee in January, planning a compliance education course for the same month would likely have a negative impact on completion rates and perceived education burden.) | | | |
| | Consider total annual hours of compliance education courses you are requiring from each employee. If you are carefully targeting education to ensure it is truly appropriate for all members of the audience, total number of hours should be reasonable and not overly burdensome. | | | |
| Determining Education Program Effectiveness | Decide how you will measure the effectiveness of the compliance education program. Will you measure completion rates? Will you test employees weeks or months after an education program to assess understanding and retention? | | | |
| | How will you ensure employees have an accurate understanding of the materials presented? Will you test employees on their knowledge before and/or after an education course to assess their learning? | | | |

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| | <p>How will you reinforce the educational content over time? Will you provide mini “refresher” courses or burst learning opportunities months after an initial education course has been completed? Will you provide written summaries of content to employees after a course for them to use as a reference in their work?</p> | | | |
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