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Training for the sentinels

By Gerry Zack

I managed not to lose my temper when a training skeptic informed me that he wasn't a fan of compliance training because "it's not going to make a dishonest person do the right thing." Indeed, I doubt anyone who previously had planned on violating a law changed their mind based on receiving compliance training. A more likely effect is to clarify what does or doesn't represent a violation for our well-intentioned employees who may not be aware of a law or must deal with a rule or regulation that may be counterintuitive.

But there's another benefit to compliance training that is perhaps even more likely and important. It raises awareness for the many honest employees in our organizations who could serve critical roles by reporting things that don't look right. Even if they already know what's right and wrong, compliance training brings it to the forefront of their minds and makes them more likely to notice and report wrongdoing.

And if that training features incidents that happened at the organization, it can break down the idea that it would never happen here, we're good people, and none of this is really relevant to me and my work.

Good compliance training goes beyond informing people what's allowed and not allowed. It shows them how things can go wrong and potential consequences when they do.

It also describes some key internal controls designed to prevent or detect compliance failures. Even the most well-designed controls gradually deteriorate over time without periodic reminders given to people. Training can provide reminders of these critical controls and why they are essential.

The likelihood of hearing about an issue before it becomes a problem improves greatly by making sure everyone is aware of important policies and procedures. Promoting the hotline is very useful and informs people of how to report things. Training complements this promotion by raising awareness of what to watch out for and report not only from a policy standpoint but also procedurally. Learning about breakdowns in internal controls before a compliance failure occurs is always better than learning about them after the fact.

Lastly, without even saying it, compliance training lets people know that we think it's essential that people know the policies and procedures—in addition to how to report. And maybe that will win over at least some of the skeptics.

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