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Asha Palmer (asha.palmer@skillsoft.com, [linkedin.com/in/asha-j-palmer/](https://www.linkedin.com/in/asha-j-palmer/)) is Senior Vice President, Compliance Solutions, at Skillsoft, Nashua, NH.

How to ensure your compliance training program stands the test of time

by Asha Palmer, JD, CCEP, LPEC

Have your favorite '90s sitcoms aged well? More likely than not, some of the shows you remember watching 30 years ago may make you cringe today. From now-irrelevant cultural references to insensitive jokes and outdated delivery techniques, what our society views as “appropriate” has certainly evolved with time.

The same is true at work, where compliance professionals have adapted and enhanced how we communicate the expected behaviors of employees, partners, vendors, and others via our global code of conduct. To put it frankly: when you know better, you do better. And the healthcare industry is starting to make strides in building—and sharing—more effective codes of conduct that reflect the values, behaviors, and expectations of today . . . not five or 30 years ago.

Why does this matter? Not only does outdated and unrelatable content cause problems for your organization by setting unclear expectations, but it also correlates with a drop-off in employee engagement. According to Gallup, a mere 34% of workers said they feel engaged at their jobs.^[1] When employees don't understand how to behave at work or what matters to their company or organization, they will not be engaged in the mission or vision, and this number may drop even lower.

So how do you build compelling, effective code? What topics should your code address? According to recent research, trending compliance topics in 2022 included information security and privacy, anti-corruption, professional conduct and anti-harassment, and cybersecurity.^[2] That is, learners wanted to learn more about these topics, so they looked to their employers to educate them. Does your code and compliance training program do that?

If not, it may be time to take another look. There are many ways to update and elevate your compliance training; however, you must start by updating your global code of conduct with what your organization believes in and what it expects from employees—today. And, quite frankly, leave the rest out.

Once your code reflects these ideals, your compliance training and environment, social, and governance (ESG) initiatives can also be up leveled to tie back to the guidelines and company values you've outlined in your code.

Most compliance training is based on an organization's code, so, if you don't have a code of conduct in place, there is no time like the present to create one—and a good one at that. Here's where to start.

Defining a global code of conduct

Every human being may have a different idea of what it means to do “the right thing.” While the right thing may seem obvious to you, your organization may have different expectations of what it means and entails. That’s why it is so important to spell it out—and this is where your global code of conduct comes in.

An organization’s code of conduct is a definitive statement from leadership communicating its expectations of employees—including actions, reactions, and behaviors. It is foundational to every organization because it sets the tone for not only how to act at work but how you can expect your coworkers, clients, vendors, partners, and other stakeholders to act. It is meant to deter wrongdoing and promote honest and ethical conduct.

Outlining your organization’s mission statement, vision, values, and ESG initiatives will also help job seekers, customers, and clients understand your principles and determine if they are aligned with their own. According to a recent study, 40% of survey respondents feel that identifying ESG priorities comes down to “doing the right thing,” so creating a code of conduct that includes these priorities will help ensure the people you work with and hire are aware of and share those values and culture.^[3]

Your code is also crucial for your current employees, as it shows them what matters to your organization and their roles in bringing these values to life. That’s why your code of conduct should include and link to any specific policies or procedures your organization has put into place, as well as guidelines for employee behavior. Policies and procedures might include, but are not limited to, HIPAA, data privacy and information security, anti-bribery, conflicts of interest, and harassment.

Similarly, setting standards for employee behavior by providing information on situations like ethical decision-making enables your employees to understand not only how to handle hard situations but also what is expected of them when they are in one. By preparing guidelines and providing examples to employees in advance, you are creating the muscle memory necessary to set your organization up for success.

Establishing why a global code of conduct matters

A comprehensive global code of conduct is a good idea, whether legally required or not. That code helps you mitigate risks by serving as an internal guide and external indicator of your corporate culture. And it has great potential for impact within your organization and beyond.

For employees, a global code of conduct can make a major difference in their day-to-day work lives. It can inform on-the-job decision-making when employees are unsure what their next steps should be in a sensitive or new situation—boosting employee morale and company loyalty. In addition, it can help inform and shape your company’s corporate social responsibility and ESG efforts by defining what issues your company wants to positively impact. Employees will feel supported and prepared by their employer and have a strong sense of company values, helping to create a shared company culture and vision that feels empowering and honest.

Similarly, a global code of conduct puts you, the employer, in the driver’s seat. By putting together concise answers to common and not-so-common questions and situations and defining roles and responsibilities, you clearly communicate your expectations on behavior, encouraging ongoing feedback on how those expectations feel and are being upheld, and create symmetry across teams on leadership styles. Here are some things to think about as you write or update your code:

- Who is your audience?
- What is your objective?
- What hasn’t worked before?

- What are your risks?
- How will you measure effectiveness?

Answering these questions can help you better shape and write a code that effectively speaks to both the risks and personality of your organization and accurately communicates your values and the vision you have for the company—ensuring that no matter their role, age, location, or skill set, everyone is on the same page.

Using and acting on your global code of conduct

To determine the efficacy and comprehensibility of your code of conduct, you must share it with all your employees and provide ample opportunities for feedback. This means that all current and incoming employees should both see, become familiar with, and provide attestation to your global code of conduct. When presenting it to new and current employees, it is necessary that the company's expectations are presented openly, offered in multiple languages, and are accessible.

While global code of conduct documents should be updated with current societal norms in mind, no one can predict how the world we live in will change from year to year. Reviewing, assessing, and updating your global code of conduct is essential to the continued value and validity of the document.

The best way to ensure your updates are relevant and impactful is through feedback. You must also take consistent, effective actions when there is a breach. Providing your employees with simple ways to raise concerns anonymously is critical to reassuring them that they will be protected from possible retaliation or negative reactions.

Importantly, when you become alerted that there has been a breach of your code of conduct, you must act accordingly and fast. Whether this requires an investigation, corrective action, disciplinary action, or even employee dismissal, how you handle a breach speaks volumes to how seriously you take your code of conduct and provides transparency on what will happen if they breach it next.

Enhancing your compliance training using your global code of conduct

Once you've clearly defined your code of conduct and your employees have become familiarized with it, reflecting those values, behaviors, and expectations in your training will be much easier to align with your code. Additionally, it will make the training for your employees seamlessly connected to what they already know and understand about your organization.

Just like with your code of conduct, your training should be reviewed and updated based on employee feedback and policy changes. Your compliance training should build upon your code of conduct and assess your employees' comprehension of everything within the code of conduct you've provided. To be most effective, your training should also be customized to fit the roles and responsibilities of your employees.

Your global code of conduct is the first step in fostering ethical communication throughout your organization. It is a vital way to signal your expectations to employees, customers, partners, vendors, and other stakeholders to deter wrongdoing and promote honest and ethical conduct to ensure, to the greatest extent possible, that your organization's business is conducted in a consistently legal and ethical manner.

When you pair your code of conduct and ESG initiatives with compliance training, you will find your employees will be happier, have a deeper sense of understanding for their organization, and take pride in their company culture. Moreover, they will do all this while following your company's code of conduct and doing "the right thing" for your organization.

Conclusion

Building a successful and comprehensive code of conduct on top of maintaining strong compliance training can seem daunting, but keeping your employees informed and educated on your organizational values is paramount to your success. If you are looking for a way to keep employees engaged and happy at your company for years to come, creating and rolling out a relevant, not-outdated code of conduct might just be the secret.

Takeaways

- Building an effective global code of conduct is crucial to inform stakeholders of your organization's values, mission, and expectations.
- A global code of conduct can help with employee engagement and workplace culture.
- Updating your code of conduct and compliance training regularly is imperative.
- Your code of conduct should help inform your compliance training to gauge how well your employees comprehend it.
- Using your code of conduct and compliance training perfectly keeps employees engaged, happy, and informed.

1 Jim Harter, "U.S. Employee Engagement Drops for First Year in a Decade," Gallup, January 7, 2022, <https://www.gallup.com/workplace/388481/employee-engagement-drops-first-year-decade.aspx>.

2 Skillsoft, *Lean Into Learning: A look back on the state of learning in 2022*, accessed February 27, 2023, [https://s3.us-east-](https://s3.us-east-1.amazonaws.com/skillsoft.com/prod/documents/Skillsoft_Annual_report_Lean_Into_Learning_02_2023.pdf)

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3 Skillsoft, *Corporate Social Responsibility At Work: CSR Report 2022*, accessed February 27, 2023, https://s3.us-east-1.amazonaws.com/skillsoft.com/prod/documents/resources/SKS_CSR_Report_2022.pdf.

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