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Calvin London ([calvin@thecomplianceconcierge.com](mailto:calvin@thecomplianceconcierge.com)) is the Founder & Principal Consultant for The Compliance Concierge, Perth, Western Australia, Australia.

### Training: The good, the bad, and the ugly

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by Calvin London

Compliance training is crucial for an organization to inform employees of its regulatory/legal responsibilities and internal policies. In most cases, it is mandatory to provide some assurance that the company is committed to upholding the law and reinforcing a culture of ethical behavior. Disregarding the required rules, regulations, or policies within an organization can have drastic consequences, including loss of employment, fines, criminal prosecution, problems in audits, and—last but not least—damage to the business’s reputation.

In a recent benchmark report, almost half of participating companies (48%) indicated that training employees on policies was one of the top three challenges for them.<sup>[1]</sup> Across my time in compliance and as an auditor of quality and compliance systems, I have seen them all—good, bad, and ugly. This article discusses some of the telltale signs characteristic of each, suggestions for a good compliance training process, and, conversely, six ways to sink your compliance training.

#### Training and the need to get it right

As with any business process, the type of strategies used to train your employees will affect the quality and effectiveness of that training. In many cases, training *per se* is seen by management as an unnecessary evil that must be done in order to tick a box that says, “We have a training program.” Similarly, for employees, it is seen as a waste of time and interference to doing their job. Three important factors can affect whether you start with an “ugly” or a “good” system.

#### Training is a process, not a program

It is my opinion that training is a process, not a program. As discussed in an article last year, I also think it is time to start referring to compliance training as education more so than training.<sup>[2]</sup> We want employees to understand how to interpret a code of conduct or regulation rather than simply listing all the components without understanding how to interpret them. This is different from training, which is more appropriate when employees learn how to do a particular action, complete a form, or fill out an application.

It follows that when we talk about compliance training or education, it needs to be ongoing as regulations change and employees develop new skills. By calling it a training program, it suggests an endpoint and compliance training should be ongoing.

#### The quality of your training will reflect the culture of the organization

Organizations that view compliance education as nothing more than a necessary evil—and implement training

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reflecting this—have already expressed a negative culture. A 2020 survey showed that 52% of respondents agreed or strongly agreed that their employees view compliance as a necessary burden.<sup>[3]</sup> Remarkably, 72% agreed on some level that it is more financially viable to essentially ignore compliance and instead pay the fine if an incident occurs. Only 6% strongly disagreed with this strategy.

Culture is as much about what you do as what you say. Implementing training that provides the employee with a one-time onslaught of everything they are supposed to know for their role at the start of their employment, with no further mention of the word “training,” shows a decided lack of continuous improvement or concern for the welfare of employees.

## **Buying an off-the-shelf training system is only part of the answer**

Globally, organizations spend just over \$100 billion on job training; in the U.S., an average of 16% of training budgets are spent on external (outsourced) supplier learning tools and systems.<sup>[4]</sup> Despite this amount of money, 70% of employees say they have not mastered the skills they need to perform their jobs.

The number of organizations using online and e-learning tools as their main delivery method for compliance training is estimated to grow by 21% to 60% in 2024.<sup>[5]</sup> This projected growth indicates that the challenge of developing and maintaining an internal compliance training system is either too costly or time-consuming. Hopefully, such a transition will not result in the loss of valuable information concerning the “why” of training that makes up part of an employee’s education. Outside products can provide solutions to the “how,” assisting employees to understand the broad principles of compliance required for their roles; however, they do not provide an understanding of their roles, what their organization is about, the values and ethics, or specific policies and procedures. This fine-tuning has to be done by an organization to put their own individual stamp on the training provided.

## **Consequences of bad training, and what does it look like?**

Inadequate training or educational processes in the workplace not only result in poor performance—with employees experiencing increased levels of work-related stress and decreased morale—but will also affect productivity, revenue, and even the organization’s reputation. Because of the negative stigma surrounding training, many organizations do not accept or realize how crucial effective training and education can be until it is too late. In such cases, it is likely that more effort and more money will be required retrospectively than would have been required for a proactive training process.

In its *Evaluation of Corporate Compliance Programs*, the U.S. Department of Justice (DOJ) recognizes that a “hallmark of a well-designed compliance program is appropriately tailored training.”<sup>[6]</sup>

The difference between good and bad training systems is as much about attitude as anything. In Table 1, the components described as ugly are characteristic of organizations with an attitude of “Training is a waste of time. Do the bare minimum so we can tick a box.” Those listed under “bad” are more likely to be characteristic of an organization with a greater understanding of the importance of good training and educating employees but do not have the financial or resource support to implement a better system. It reflects the status of many organizations that want to be more proactive.

UGLY	BAD	GOOD
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Poorly designed	Some design of the training system and process	Training determined on an as-needed basis documented in a position description
One-size-fits-all deployment	Only provided as induction training for all employees	Training is provided at employee's pace and provides opportunities for development
Heavily dependent on "read and understand"	Dependent on electronic "read and understand"	Different delivery processes to suit the content
No proficiency assessment	Minimal proficiency assessment	Proficiency assessments that require a passing score
No monitoring of performance	No monitoring of performance	Effectiveness of training reviewed regularly
Minimal revision of content	Revised every 2–3 years	Content revised regularly
No evidence of periodic revisional training	Minimal periodic revisional training	Periodic revisional training defined and executed
No employee feedback	No attention to employee feedback (if obtained)	Employee feedback is welcomed and actioned
Employees disciplined for noncompliance	Employee compliance is not monitored or not enforced (except just before an audit!)	Employees are rewarded for active participation

**Table 1: Components of Good, Bad, and Ugly Training Systems**

If we consider the bad systems to be transitional between ugly and good, then the characteristics of an ugly system are the antithesis of a good system. A properly designed system considering individual training needs will be more successful than a system thrown together to simply satisfy a need (i.e., just having a training program). One-size-fits-all systems (as opposed to proactive and progressive training systems) demonstrate to employees a commitment to provide them not only with required training and education but also development opportunities.

Similarly, set-and-forget training systems that are seldom revised or updated can quickly become outdated and demonstrate a lack of commitment to employees, which will subsequently be reflected in their attitudes to the way they approach their everyday activities and the company culture.

While nobody likes proficiency assessments, they are an essential part of training to give the trainee confidence that they have understood the content. They can also help the company understand whether the design and content of the training module are effective. Within certain limitations, the best training systems are also based on considerations of employees and what works for them. They can provide valuable insight into the best way to get the message across. This is achieved by regular feedback from employees on what is and what is not working.

The transition from bad to good should be considered part of an improvement process, and a clear plan for the required steps is a good start. Listed below are six ways to sink your training efforts and six ways to get rewards for your efforts that do not require significant resources.

## **Six ways to sink your training program**

### **Better than a sleeping tablet**

A long module that loses people after the first few pages or slides is not only unproductive but can also be destructive. Long training modules that do little more than reiterate a copy of a policy or process—with no explanation of why—will quickly lose the attention of trainees. Their recall effectiveness will not be much better than zero, and they will start to think of ways to get through this faster rather than pay attention to the content.

Although passing around a lengthy PDF or slideshow presentation may seem like the easiest training method, several other training methods and strategies (highlighted later) can provide employees with more effective education while staying engaged and motivated throughout the process.

### **Asking the wrong questions?**

Meaningless and obvious questions, while easier to put together, will not test the trainee's knowledge. Making all the multiple-choice questions the same answer (A, B, C, or D), always making "all of the above" the right choice, or making all true and false the same (either all true or all false) gives trainees an opportunity to get credit without understanding. They will quickly learn to play the numbers game.

### **Too much detail**

It is tempting to put every detail into training materials. Referencing materials to provide examples to demonstrate a particular point can be effective. Filling up a training module with endless information the trainee will never remember will only frustrate and not educate them.

### **Outdated references**

Highlighting a reference to a policy or some other form of information that leads to a dead end demonstrates a lack of attention to detail to trainees. Perhaps of greater concern is when a link leads to an outdated reference. While this may seem a positive step in constructing training materials, it can be a compliance trap that requires additional ongoing attention. The module will also require updating every time the reference material is renewed.

### **Force-feeding one-size-fits-all**

Most employees (good ones, anyway) want to learn things that are useful and will move them ahead. What they don't want is irrelevant training that's a waste of time, especially when it is force-fed to them. Training for training's sake forced upon employees in the first few days or weeks of their employment—in an attempt to get it over with before they start their real jobs—doesn't work. Certain requirements need to be reviewed prior to

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commencing (induction training), but other skills or knowledge can be achieved with a more gradual and progressive approach.

## **Set-and-forget training programs**

Unorganized materials that are outdated, copies of detailed policies and procedures that are no longer current, or material that is too generic, too basic, and boring doesn't impart knowledge. Like any well-controlled document, training materials need to be regularly reviewed and updated, even if it is only to change the design or the questions in the proficiency assessment.

## **Six ways to make your training program sing**

### **Slow and steady**

One of my favorite sayings when trying to get people to change something is, "How do you eat an elephant?"

The answer is: slowly, one bite at a time. In today's fast-paced and highly distracted world, there is a trend to get everything done quickly. Some things (and training is one of them) need to be delivered to employees when needed rather than all at once. Delivering training at a steady pace will not only assist in their ability to effectively learn, but it will also impart a more positive attitude about training. One of the advantages of online learning is flexibility in a low-pressure environment that enables learners to succeed more readily.

### **Make it sexy**

Real-life examples, group discussions, and continual short, sharp refreshers (discussed later) can be powerful learning tools. Getting a group of employees together for a lunch and learn that talks about the 10 worst cases of bribery and corruption will be far more potent than sitting each employee down to wade through 30 slides of the theory of bribery. Real-life messages tied to values and principles are authentic and relatable.

### **Give them a box of chocolates**

Mixing up your modes of delivering training not only keeps things interesting for your employees but also enables you to assess what styles of training work best in different situations.

Classroom-style training builds a solid foundation but can quickly lose effectiveness if not applied regularly. Instead, creating "learning moments" as part of daily work responsibilities and encounters can be significant and engaging. Continual refreshers such as sound bites, memory joggers, and moments of truth are also effective ways to keep your messages flowing and provide knowledge and skills to your employees as refresher training, and they do not require extensive resources.<sup>[7]</sup>

### **Encourage accountability and set the tone**

Matching learning experiences to your employees' needs—and recognizing there are likely differences at every stage of the learning process—sets a positive tone for employees. One of the most common mistakes companies make with training is assuming all employees have the same learning needs. Bear in mind that the workforce now comprises five generations, all of which have different values, goals, and learning styles.

Once you have demonstrated you care about training, educating your employees, and providing them with options, make it clear that it is a two-way street. You need their input to learn what will work best for them, as emphasized in the characteristics of good training (see Table 1). Many variables shape their preferences and

reception to training. These might include experience levels, length of tenure, work ethic, and career motivations.

## Reward and recognition

If you have trouble getting reluctant employees interested in using your training opportunities, you may want to consider offering incentives. You can gamify training, set up competitions, and offer gift cards or other incentives when certain predetermined objectives are reached. You may even incentivize employees to attend training by offering paid time off *in lieu*. Nonfinancial rewards are also powerful incentives. Some employees respond well to simply being recognized as having achieved something, in this case, a particular training level or standard.

## Add questions sequentially throughout the training

The virtues of proficiency assessments have already been highlighted above. The next level of development for a truly good delivery system is to move these questions to different points in the training module or session. Many off-the-shelf modules do this very effectively, stopping after each section or chapter and asking questions related to the material just presented. This not only breaks up the monotony of training but also assesses the trainee's knowledge at the time of learning.

## The magic sauce: Employee feedback

Employee feedback—based on an ongoing assessment and review of what is being provided and what is expected of them—is one of the most overlooked tools in corporate management. Keeping training current is one thing, but mixing up and adapting processes based on employee feedback is very empowering and leads to more successful education.

Asking questions in a relaxed setting is a great way to do this, as it lets employees express their opinions and communicate openly. For example, this can be done through informal one-on-one meetings with each employee or in small groups over a cup of coffee. Use this time to check in on their progress, the projects they are working on, the challenges they may be facing, what they like and dislike about their roles, and whether the training they receive meets their development needs.

## The final word

Getting training right is not only good business; it protects the company's compliance and helps retain employees by providing them with a future. We all have to do it, but making small, progressive changes to training can make a chore into something much more valuable.

Rushing the learning process (or telling employees everything at once before letting them get their hands dirty) and force-feeding them in the first few weeks of employment with poorly structured training materials is sure to get them quickly offside. Training (education) does not have to be long or detailed; several alternatives have been referenced in this article. Some of the most impactful learning opportunities can happen outside of formally constructed programs and through daily interactions between peers, managers, and employees.

One company that introduced a new training program surveyed its employees who chose not to participate in the new endeavor and found that the most common answer was, "The value of this training isn't worth my time." Furthermore, 86% of employees say job training is important to them, but 33% of U.S. workers say their current company-provided training doesn't meet their expectations.<sup>[8]</sup>

The transition from bad to good training does not necessarily require significant resources but does require a change in attitude and thinking. Making training time more valuable to employees and communicating the benefits is a good start.

## Takeaways

- Training is a process, not a program, and compliance training should be viewed more as ongoing education.
- Organizations that view compliance education as nothing more than a necessary evil and implement training that reflects this have already expressed a negative culture.
- The difference between good and bad training systems is about attitude, structure, process, and delivery.
- A properly designed system considering individual needs will be more successful than one that simply satisfies an organizational need to say, “We have training.”
- Employee feedback on what is being provided to and what is expected of them is one of the most overlooked tools in corporate management.

**1** Carrie Penman, *2022 Definitive Risk & Compliance Benchmark Report*, Navex, <https://www.navex.com/en-us/resources/benchmarking-reports/2022-definitive-risk-compliance-benchmark-report/>.

**2** Calvin London, “Unethical People, Bad Apples & the Effect on Corporate Compliance,” *Corporate Compliance Insights*, December 14, 2022, <https://www.corporatecomplianceinsights.com/ethics-bad-apples/>.

**3** Maninder Nijran et al., *Thinking Outside the Tick Box*, Thompson Reuters, March 2020, <https://www.thomsonreuters.es/content/dam/openweb/documents/pdf/Singapore/report/Special%20Report%20-%20Thinking%20Outside%20the%20Tick%20Box%20-%20Thomson%20Reuters%20Compliance%20Learning-SEA.pdf>.

**4** Lorri Freifeld, “2022 Training Industry Report,” *Training Magazine*, November 2022, <https://trainingmag.com/2022-training-industry-report/>.

**5** Nijran et al., *Thinking Outside the Tick Box*.

**6** U.S. Department of Justice, Criminal Division, *Evaluation of Corporate Compliance Programs*, updated March 2023, <https://www.justice.gov/criminal-fraud/page/file/937501/download>.

**7** Calvin London, “Training foie gras: Problems with modern-day training,” *CEP Magazine*, July 2019, <https://compliancecosmos.org/training-foie-gras-problems-modern-day-training>; Calvin London, “Sound Bytes, Training Shots and Memory Joggers,” *Ethikos* 33, no. 10 (October 2019), <https://compliancecosmos.org/sound-bytes-training-shots-and-memory-joggers>

**8** Kevin Kruse, “Why ‘I don’t Have Time For Training’ Is A Lie,” *Forbes*, March 29, 2022, <https://www.forbes.com/sites/kevinkruse/2022/03/29/why-i-dont-have-time-for-training-is-a-lie/?sh=142082b34e99>.

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