give your compliance learning program a shake up

L&D Managers: is your compliance learning program increasing risk, wasting time, money and employee brainpower, and damaging your internal brand?

Most organisations, particularly large ones, usually have a comprehensive compliance-based learning program covering the legislative and regulatory obligations of employers and employees. Course topics generally include health, safety and environment, corporate ethics, information and systems usage and employee conduct.

Getting compliance-based learning right is a critical risk mitigation process for organisations, and for many employees, these courses will probably be the most regular and predictable training they undertake across the course of their employment. But if the content is overloaded, irrelevant, and not immediately applicable, it might also be the most boring training they will ever do!

L&D departments have an important role to play in ensuring that the learning process doesn't take a back seat to 'butt-covering'. If you feel that there is room for improvement in how your organisation does compliance training, then read on for some handy tips to set you up for success before you design your new program.

1. Develop a current state view, including costs

Start by analysing your entire compliance learning program, and quantify everything you can. Put together a table capturing summary info on each course: topic areas; learning objectives; modes of delivery; completion timeframes; reaccreditation requirements and completion rates. To get to a deeper level of analysis, include the relationship between each course and the specific legislative, regulatory or risk elements they are designed to address. Going back to these first principles of **what** and **why** is particularly important to understand and capture, especially if you have a legacy program that has been in place and/or added to over a long period.

Make some assumptions about what the overall program costs to implement on a recurring annual basis. If you have access to standardised hourly labour rates across your company, and can apply this to the number of learners completing the programs in any given year, then use this calculate the exact costs. If you don't have standardised rates, get your calculator and work out an average hourly rate for all learners and use this. It's important to understand the true costs of learning programs so you can make informed assessments about impact and value.

This overall current state analysis will be very useful throughout the process of engaging stakeholders and informing review and future state design considerations, and later as a baseline to evaluate your new program against.

2. Know your stakeholders

There are many people who have a stake in the process and outcomes of compliance programs. The most obvious ones are the people who are responsible for organisational compliance. At the highest level, your CEO and/or Board are the people who are ultimately accountable for ensuring that all employees know what they need to know to keep the company out of legal trouble.

Depending on the size and complexity of your organisation, you may have a legal, risk or compliance team, who have assumed some delegated responsibility from the CEO and/or Board for managing the overall compliance program.

There will likely also be subject matter experts, who are the key authority for a particular topic. These people can be the trickiest to manage, as they will be neck-deep in the specifics of their focus areas, and may not be able to see 'the wood for the trees'.

Managers are also stakeholders, from the perspective of the amount of time it takes them and their team members to complete the program of courses, and having to manage the application of what has been learned to daily business operations.

The most important stakeholder group are the learners themselves. With compliance programs, this is everyone, from the boardroom to the frontline, including everyone in the above groups.

3. Ask for feedback

Whether you want to gather feedback formally via focus groups or surveys, or informally via observation, anecdotal evidence or random interviews, it's important to understand what people across all stakeholder levels think of your current program.

To get a richer level of feedback, try to construct questions that go beyond content and delivery, and gather information about the relevance, application and effectiveness of the learning. Look for examples of where the programs may have failed, and dive into why that could be. Your earlier analysis of costs, along with feedback gathered, will be important information to use if you decide to proceed with a project to revamp your program.

4. Research and create the overarching principles for your new program

Compliance programs can historically be dry and boring, and are often overloaded with content, so don't fall into this trap with your new design. A good guiding principle is to include only that content that 'everyone in your organisation needs to know every day.' This in itself may sound like a recipe to include everything, but it's not! You should aim to escalate the content to just the absolute basics. Many employees may not need to apply their learning very frequently, so it's important that the content covered is relevant,

delivered appropriately and immediately useful, to make the knowledge as sticky as possible.

Where more detailed information needs to be included, consider the performance support options available to your learners. Your program principles should then include how to best build your employee's understanding of when and where to access this additional information e.g.: via your company policy and procedure manuals, intranet/portal sites for further information or key contacts for specific expertise or help desks.

It's far more important that learners can identify and understand when and where to seek further information than it is to attempt to build a program that imparts an encyclopaedic knowledge of everything. It will cost a fortune, it won't work, the learners will hate doing it, and your compliance risks will skyrocket.

5. Reference best practice and standards wherever possible

When considering the principles for your new design, refer to best-practice wherever you can. It can be very helpful to reference external research or published standards for compliance programs, particularly if you find yourself dealing with stakeholders who want to include reams of unnecessary content at the expense of the learning process.

There is a new ISO standard (19600:2014 – Compliance Management System Guidelines) that goes into some detail about the competence and training requirements of compliance programs. Copyright restrictions prevent me from including the full reference, but in nutshell it suggests that organisations should make sure that employees are competent via education, training and work experience, and that results would be evaluated for effectiveness and evidence of competence records should be retained. It also suggests that training should be tailored to company and employee obligations, be based on an assessment of knowledge and competence gaps, practical, relevant and easily understood, and flexible enough to allow for different needs.

For those of you with programs that have a never-ending cycle of reaccreditation – i.e.: some or all courses need to be redone at regular intervals - the ISO standard has a section on what the **triggers for considering retraining** should be. These include when there is a change of positions, responsibilities, policy, procedure, structure, company obligations, or issues arising from program failures or recorded non compliances. So unless any of the above have occurred, or you are subject to a piece of legislation that specifically mandates a training frequency, the courses in your compliance program should not need reaccreditation.

Your stakeholders might think that repetition = learning, but that doesn't mean it's true. Do we really still believe that a person who needs to repeat a course on an annual basis understands everything on day 364, and on day 365 the knowledge just falls out of their head? It's a ludicrous proposition, and if you can't appeal to your stakeholder's better judgment by referencing your feedback analysis and/or adult learning principles, the ISO standard might just help you to prove it.

So what are you waiting for?

Compliance based learning programs get a bad rap in the world of work. And if they aren't designed and reviewed properly, they probably should. If you've gotten this far, the next steps are where the fun begins – design, development, implementation and measurement!

Need help?

Contact Open Access Learning if you'd like more information or support to review and redesign your compliance learning program.

Further reading

Andrew Gerkens has published a great post on compliance training on LinkedIn Pulse – you can access it here:
https://www.linkedin.com/pulse/compliance-just-another-order-training-andrew-gerkens

SAI Global have developed a useful and free illustrated guide to effective policy communication and training – you can access it here:
http://www.saiglobal.com/compliance/resources/whitepapers/policy-communication-and-training.htm

To purchase the full ISO Standard **19600:2014 – Compliance Management System - Guidelines** if you're in Australia, go here:
http://infostore.saiglobal.com/store/Details.aspx?ProductID=1774046

For the rest of the world, go here:
http://www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=62342