



## 9. Pay attention to behavior and culture during every compliance training

### Challenge

The theme of behaviour and culture has many aspects. It can be challenging to clearly communicate the most important elements of behavior and culture to all employees within the organization, to clarify what exactly the concept of behavior and culture encompasses and why it is important.

### Solution

One way to ensure that the most important elements of the theme of behaviour and culture receive sufficient attention within the organisation is to consistently pay attention to specific element(s) of this theme during every training and/or meeting relating to compliance.

Some examples:

- Indicate during each compliance training how the compliance program is organized (the governance) and what the most important elements of the compliance program are. In addition, underline the importance of 'behaviour and culture'.
- Present one specific dilemma during each Compliance training and/or meeting and then discuss this interactively. During the discussion, the elements 'corporate culture and/or individual behaviour' should will be discussed. For example: suppose that your core values state that the customer is at the center of everything you do. The question "What does the customer ultimately benefit from this?" at the start of the training can lead to very interesting discussions.
- Mentioning the whistleblower/Speak Up procedure at the end of a Compliance training can be very effective. Sometimes reports come in immediately after a training based on the same whistleblower regulation / Speak Up procedure.

With all the examples mentioned above, 'the power of repetition' applies. By consistently bringing back certain topics, the chance is bigger that the message will 'stick' with the participants.

More general, it is important to ensure that trainings are appealing and engaging. By clarifying why the topic is relevant to the target group and what it means for them in daily practice, the relevance of taking part in the training will rise.



It is recommended to use different forms of learning as to adhere to different learning-styles. This can be done via written messages, video's or blogs, animations, role plays, workshops, speeches etc. The content of the training material should be based on company-specific compliance issues, the organisations policies and, when possible, specific and relevant cases. By doing so, the content fits in with daily practice and becomes both recognizable and applicable. Additionally, it might be useful to seek advice from an external training agency. HR can also play a role as the HR department often also has expertise in the field of organizing and designing training courses.

### **Actors**

- Compliance
- Management
- Communication
- HR
- Possibly an external training agency

### **Techniques**

To ensure that the message comes across well and sticks with the participants, so that they can apply it in practice, the following techniques can be applied to the intended training courses:

- 1) Create a type of training that is relevant to the audience and that focuses on infotainment [1] (for example, through the use of video or animations).
- 2) Involve managers in a workshop and create a safe environment where people, also with their managers, can have a meaningful dialogue on a safe (working) environment and the definition of boundaries.
- 3) Facilitate dilemma workshops (for more information about this, see tool 21. "Organize dilemma workshops"), collect relevant input for the training material (real life cases) and ensure a relation between practice and theory.
- 4) Limit the messages from a training to key-messages (keep it simple); don't try to share all your knowledge at once. As a professional your knowledge is more and broader than the knowledge of participants and too much knowledge might be demotivating or overwhelming. Train-the-trainer: Select trainers who have or want to develop training skills. It helps to improve the training (and its impact) by training trainers professionally.
- 5) Be aware of the power of repetition. Sometimes it can be useful to have one particular theme which is mentioned in different ways during different training sessions; this can have a positive effect on the extent to which the message really "lands" with the participants.



### **Role Compliance Professional**

The task of the Compliance Professional here – whether or not in collaboration with other actors, as mentioned above under the heading Actors – consists of creating the design of the training courses, selecting and designing the content of the material and coordinating the logistics of training courses. In addition, the Compliance Professional, whether or not in consultation with HR, has a task regarding the training of the trainers , e.g. by selecting the suitable persons and / or organizing train the trainer sessions.

**Footnote 1:** infotainment means that serious information is made accessible to a wide audience in a light-hearted way.