

Education and Training in Your Compliance and Ethics Program

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Karl Schneider
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Agenda

- ▶ Introduction
- ▶ Evaluation of Corporate Compliance Programs - April 2019
- ▶ Risk-Based Training
- ▶ Form/Content/Effectiveness of Training
- ▶ Communications About Misconduct
- ▶ Availability of Guidance
- ▶ Conclusion
- ▶ Questions

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Introduction



Karl Schneider
Manager,
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Joy H. Thorpe
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Evaluation of Corporate Compliance Programs - April 2019

Three Fundamental Questions

- ▶ 1. “Is the corporation’s compliance program well designed?”
- ▶ 2. “Is the program being applied earnestly and in good faith?” In other words, is the program being implemented effectively?
- ▶ 3. “Does the corporation’s compliance program work” in practice?

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Evaluation of Corporate Compliance Programs - April 2019

- ▶ “Is the corporation’s compliance program well designed?”
 - ▶ Risk Assessment
 - ▶ Policies and Procedures
 - ▶ Training and Communications
 - ▶ Confidential Reporting Structure and Investigation Process
 - ▶ Third Party Management
 - ▶ Mergers and Acquisitions

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Evaluation of Corporate Compliance Programs - April 2019

- ▶ Risk-based training
- ▶ Form/Content/Effectiveness of Training
- ▶ Communications about Misconduct
- ▶ Availability of Guidance

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Risk-Based Training

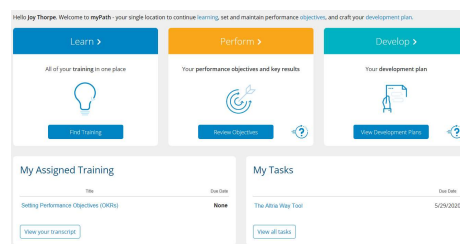
- ▶ Risk assessment process drives training that is delivered
 - ▶ New hires
 - ▶ Right From The Start
 - ▶ TSM 101 and TSM 201
 - ▶ New Managers
 - ▶ You Lead The Way
 - ▶ Quarterly Process for all employees
 - ▶ Tailored to specific segments of the organization
 - ▶ Focused on risk areas unique to a sales force



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Form/Content of Training

- ▶ Form/Content
 - ▶ In person
 - ▶ Lecture
 - ▶ Group Participation
 - ▶ Group Activities
 - ▶ Online
 - ▶ Video
 - ▶ eLearning
 - ▶ Knowledge Check
 - ▶ Other
 - ▶ Posters
 - ▶ C&I Playlist within the LMS
 - ▶ Previous training
 - ▶ Policy/Code Of Conduct
 - ▶ Fun/Engagement



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Video Placeholder “Do The Right Thing”

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Content Example - The Field

THE FIELD

▶ Quarterly Training

- ▶ Month 1 - Introduction
 - ▶ Read the policy and think about how it applies to your role
 - ▶ Commercial (**Play Commercial)
- ▶ Month 2 - Deep Dive
 - ▶ Full Training - either through an eLearning or in person with your team
 - ▶ Full Episode (**Play Episode)
- ▶ Month 3 - Knowledge Check
 - ▶ Interactive Quiz - taken individually
 - ▶ eLearning where characters from THE FIELD ask the questions
 - ▶ Must answer 8 of 10 questions correctly, or retake the training



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Video Placeholder “THE FIELD” - Commercial

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Content Example - The Field

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Video Placeholder “THE FIELD” - Full Episode

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Content Example - The Field

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Content Example - New Employee Training

- ▶ TSM 101
 - ▶ In person, in conjunction with skills training
 - ▶ Examples
 - ▶ How does Kyle handle compliance opportunities?
- ▶ TSM 201
 - ▶ In person, in conjunction with skills training
 - ▶ Breathing Under Water
 - ▶ Film viewing (show trailer)
 - ▶ Review with experts from Law Department



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Video Placeholder “Breathing Under Water”

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Content Example - New Employee Training

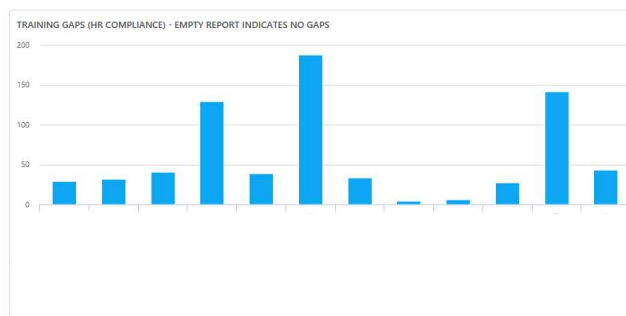
- ▶ TSM 101
 - ▶ In person, in conjunction with skills training
 - ▶ Examples
 - ▶ How does Kyle handle compliance opportunities?
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Effectiveness of Training

- ▶ Effectiveness
 - ▶ Completion
 - ▶ Knowledge Check
 - ▶ Practical Application/Supervisor Validation



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Communications About Misconduct

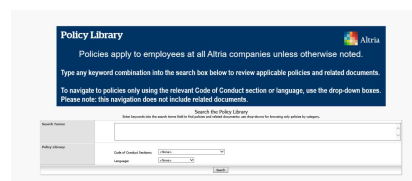
- ▶ Share Key Performance Indicators (KPIs)
 - ▶ # of allegations
 - ▶ # of violations
 - ▶ # of separations
 - ▶ Policies that were violated that resulted in separations



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Availability of Guidance

- ▶ Intranet site
- ▶ Policy Library
- ▶ Survey
 - ▶ Does my manager set a good example of ethical behavior?
 - ▶ Does our culture support reporting potential violations of the Code of Conduct, company policy, or the law?
 - ▶ Are reports of potential violations of the Code of Conduct, company policy or the law investigated and acted upon?
 - ▶ Do you ever feel pressured to compromise the Code of Conduct, company policy or the law?



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Conclusion

- ▶ Make sure training is the right answer for the problem you are trying to solve
- ▶ Training should be engaging
- ▶ Be learner centric not topic centric
- ▶ Consider adding humor and gamification to training
- ▶ Consult with L&D, they will know how best to connect with your audience
- ▶ Understand your budget, and what you can do with it
 - ▶ Don't be afraid to ask for more. The cost of a compliance failure is always more than the cost of prevention.

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Questions?

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