How to Make Compliance Training More Meaningful

SCCE Singapore Compliance & Ethics Regional Conference

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The Employees (Usual) Reaction:

OH PLEASE
NOT ANOTHER TRAINING COURSE
Make Compliance Training More Meaningful

What You Can Do

- Case Studies
- Role Plays
- Games
- Story-Telling
- Videos
- Quizzes

Make Compliance Training More Meaningful

What You Want to Do

Pre-Training Preparation:

What do you want participants to get out of it?

What medium can help achieve this?
Case studies to raise awareness

A long journey

It’s early in the morning during the start of a long weekend and Mr. Ari, Head of the regional Mining & Energy department, calls your company’s Mining Head and informs him that he is driving from Banyuwangi to Surabaya to visit his mother who has just had a stroke and his family would very much appreciate a place to overnight on their way to Surabaya. The Mining Head knows Mr. Ari very well as he’s been coming to the mine every year for the past 5 years to ensure the mining plan is properly implemented and followed.

Mr. Ari says that the 9 hour drive will be longer over the holiday weekend and they can’t fly because his wife is 8 months pregnant. The journey will be too tiring for his family without stopping for a night. Since your company’s mine is in the middle of the way, Mr. Ari says he would very much appreciate any in-kind hospitality that he would remember during his next visit to the mine. The Mining Head says he would get back to Mr. Ari right away.

The Mining Head knows that during the long weekend, hotels in the area are usually full, but his parents own a big hotel in the area. Sometimes the hotel is used by Company guests during business or official visits. However, the Mining Head wants to give a special treatment for Mr. Ari and his family since he is senior and they have a good relationship, and the visit is not in Mr. Ari’s formal capacity.

The Mining Head is thinking of inviting Mr. Ari for drinks at the hotel, followed by a nice dinner with his whole family. Another thought is to offer his wife a traditional Javanese massage for pregnant mothers while he takes Mr. Ari and his son fishing in the small river nearby. Then they could cook the fish they catch and have a simple lunch before Mr. Ari leaves to Surabaya. He also wants to give a small local handmade fishing rod to Mr. Ari’s son to entertain him for the remaining 4 hours to Surabaya.
Discuss with your team and be prepared to present:

1. Should the Mining Head offer or even mention his family hotel to Mr. Ari?

2. Is it OK for the Mining Head to provide additional hospitality for Mr. Ari and his family?

3. Is it OK for Mr. Ari to stay at that hotel during his annual mine inspection?

4. Any other concerns?

Should the Mining Head offer or even mention his family hotel to Mr. Ari?

Because Mr. Ari is responsible for oversight and inspection of the mine, there is always a significant risk that offering his parents’ hotel for a personal stay might be perceived as an attempt to influence or gain an improper advantage from Mr. Ari when he does the annual inspection. His remark seems to indicate this. However, if Mining Head only offers to secure a room for Mr. Ari at the hotel during the very busy fully booked holiday weekend and Mr. Ari pays normal rate for the hotel himself, then this will significantly reduce such risk.
Make Compliance Training More Meaningful
What You Want to Do

Training Objective:

What do you want participants to get out of it?
What medium can help achieve this?

Role plays to involve the audience

We Love Books
**Jajbir Singh**: Joint Secretary of Ministry of Road Transport & Highways

**Sandeep Pai**: Head of Safety for Fox Transport

- Sandeep: “Good morning. I would like to speak with the Joint Secretary Mr. Singh, please.”

- Jajbir: “Good morning, Mr. Singh speaking. What is it regarding please?”

- Sandeep: “Mr. Singh, this is Sandeep Pai from Fox Transport. We spoke last week regarding our H&S initiative in Mumbai. As mentioned, our company is highly committed to road safety in the country and it is very important for us to train drivers and raise awareness on common road hazard.”

- Jajbir: “Oh yes, Mr. Singh. Thanks for following up. Our Ministry will support your initiative and we will also make available some road safety experts from our end to make sure your activity is successful. However, regarding the closure of Vazir Glass Factory Lane, I am experiencing some difficulties with the Minister to approve this special request. As you know, Mumbai is already congested with traffic and closing an entire road, even to promote good practices, will be extremely challenging to manage.”
• Sandeep: “I understand Mr. Singh. But the closure of the road is key to our initiative. We cannot get our truck drivers to train in a ‘real’ environment as this might endanger passer-by and other road users. I thought we agree to that and I also mentioned we set aside a budget for this road closure. You know, this program is really important for us to educate the drivers.”

• Jajbir: “Alright. Well, if you’re really committed to education, then there is another project you might contribute to. I know Fox Transport regularly conducts CSR activities, correct?”

• Sandeep: “That is correct.”

• Jajbir: “So my wife, that you met last year at the Road Transport Gala Dinner, is running this charity in the north that helps school kids to improve their reading skills. She recently read that fantastic book from a French author Antoine Something, I can’t pronounce the name properly. The book is called ‘The Little Prince’ and it’s a beautiful story about a young boy and his rose. Did you read it?”

• Sandeep: “Yes, I read it many years ago. But I still remember it!”

• Jajbir: “Fantastic. So my wife wants to translate the book in Punjabi and distribute it for free in local schools in Punjab and other states. But she needs funds for the translation and publication. Would you be ok to convince your CSR manager to approve this donation?”

• Sandeep: “Well, it sounds like an interesting initiative. I am also personally engaged in children development in the country. But would you try to convince the Minister for me if I manage to get this donation approved internally?”

• Jajbir: “I could work on that but in that case, I would need your help to transfer the money into the book publisher’s bank account.

• Sandeep: “Sure, no problem. Let me get back to you after I speak with my CSR Manager”

• Jajbir: “Thank you. Looking forward to contributing to the development of education in the country together. Talk soon.”
Discuss with your team and be prepared to play the role of Sandeep:

1. Can Sandeep proceed with the charitable donation?

2. Is there any concern about making the donation as CSR?

3. Is it ok to transfer the money to the book publisher?

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What You Want to Do

Training Objective:

What do you want participants to get out of it?

What medium can help achieve this?
Practical Games to Involve Everyone

Take it or Leave it

Gifts and Hospitality Receipt Log

<table>
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<th>No.</th>
<th>Ref number</th>
<th>Date received</th>
<th>Recipient Name (employee)</th>
<th>Giver Name (company and individual)</th>
<th>Business relationship (supplier, vendor, etc.)</th>
<th>Accept or Decline?</th>
<th>If Accept, keep for yourself, share with department, use for lucky draw, donate to charity?</th>
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What You Want to Do

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Make Compliance Training More Meaningful

Framework

Pre-Training Preparation
- Review and think about recent issues: look at closed cases, WB reports, audit findings / gaps, questions or issues from previous training or from HelpDesk

Objectives & Agenda
- What is your Objective?
- Who are the participants?
- What function(s) are they in and what compliance and ethics issues are they exposed to in their work

Post Training Debrief
- Review and think about what went well
- Did participants actively participate
- Review feedback about what was learned and what can be improved
- Review selected responses to quizzes
Make Compliance Training More Meaningful
Relevant & Engaging

Relevant
- Context / Environment
- Industry / Supply Chain (upstream or downstream)
- Regulators / Regulations
- Business Unit / Function

Emotional
- Humor / Fun / Entertaining
- Moving / Disturbing / Surprising
- Embarrassing, Challenging
- Enlightening, Awakening

Make Compliance Training More Meaningful
What Else You Can Do

- Pre-Workshop materials: recent articles, short video, case study, speech, short quiz, feed-forward)
- Technology
- Audio-visual
- Polling devices (data privacy)

- Post-Workshop materials: key learnings, case study / considerations, policies / policy summary, links to WB Hotline or HelpDesk
At end of Training, provide some Takeaways

Takeaways

- Relevant: Time, Place and Language
- Emotional: Humorous, Shocking, Touching
- Participation Participation Participation
THANK YOU