Rob Strulowitz / Sandra Bograd
GRC Compliance Consulting (Training & Advisory)

The Global Conundrum:
Making Your Training Vendor’s Compliance Content Resonate
with International Audiences
SCCE Europe Conference – April 2, 2017

Presenters

Rob Strulowitz
Compliance Training product expert

Sandra Bograd
Compliance / Legal Subject Matter Expert
Session Overview

- Real world challenges in leveraging U.S.-centric content from training vendors for a global audience
- Recommended strategies and best practices for customizing and globalizing off-the-shelf content
- The future of globalized compliance training content and technology trends that offer a promising future

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Session Overview

Hour 1:
- Introductions
- Interactive Discussion – Challenges of Global Compliance Training rollouts
- Communicating with Global Audiences (Best Practices)
- Global showcase

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Session Overview

Hour 2:

• Global compliance training best practices
• Recommendations for customizing off-the-shelf training for global audiences
• Dealing with your compliance training vendor
• The future of compliance training

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The Global Conundrum

Why is compliance training so difficult to deliver globally?

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The Global Conundrum

Why is compliance training so difficult to deliver globally?

- Local regulations vary from country to country
- Regional communication preferences
- Rules based vs. principals based
- US Centric view towards ethics
- Limitations of off-the-shelf content

Interactive Discussion

Please share your Name, Company, Job Role and biggest challenge in training your employees globally

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Communicating Globally

4 Best Practices for Communicating with Global Audiences

- Think Universal
- Cast a Wide Net
- Be Culturally Aware
- Be Generationally Conscious

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Think Universal – Power of Storytelling

- Great stories effectively connect with global audiences regardless of a person’s cultural background, geography, industry, or job role.
- Well written stories tap into universal truths that are highly relatable.
- Hollywood screenwriters understand the fundamental nature of the human experience.

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Cast a Wide Net – Avoid Specificity

- Avoid stories that are too specific which could alienate global audiences
- Introduce diverse characters and broad storylines that are relatable in regions around the world
- Avoid introducing situations and environments that narrow cast any given geography, industry, or job role

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Be Culturally Aware – Understanding Your Audience

- Every culture is unique, but shares commonalities that are often overlooked
- Bring global cultural awareness into your thinking
- Take a deeper interest in global perspectives to broaden your content for international appeal

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Be Generationally Conscious – Understanding Your Audience

- Consider the different generational perspectives and how communication is broadly perceived
- Understand generational profiles
- Take a step back and think about how your content will be received from a generational standpoint

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Communicating Globally

Be Generationally Conscious – Understanding Your Audience

Case Study

Wells Fargo – Compliance Training

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Case Study

Wells Fargo

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Compliance Trends / Best Practices

Evaluation of Corporate Compliance Programs
US Department of Justice,
Criminal Division Fraud Section / issued Feb 21, 2017

Section 6: Training and Communication

- Risk-Based Training
- Form/Content/Effectiveness of Training
- Communications about Misconduct
- Availability of Guidance

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Regulatory expectations on training and communications (a sample)

Representative Sources of training requirements:

- US Sentencing Guidelines for Organizations § 8B2.1(b)(4);
- US Department of Justice corporate settlement agreements;
- Deferred Prosecution Agreements;
- SEC FCPA Guide p.59 (2012);
- OECD Good Practice Guidance on Internal Controls, Ethics and Compliance (2010);
- Anti-Corruption Ethics and Compliance Handbook For Business (OECD Handbook), C.8, p.54 et seq (2013);
- Financial Conduct Authority (UK) Conduct of Business Sourcebook (2017);
- Sapin II, France (2016);
- German Ringfencing Act (2014);
- UK Senior Manager Regime (2015);
- OECD Due Diligence Guidance for Responsible Supply Chains in Garment and Footwear Sectors (2017)

Compliance Trends / Best Practices

FCA Business Conduct Handbook on assessing competence: (UK)

- Firms decide which methods to use when assessing competence. We define competence as having the skills, knowledge and expertise to discharge the responsibilities of an employee’s role.

- This competence includes achieving a good standard of ethical behavior. It’s not just a question of having the appropriate qualification reading the Principals of Audit.

*Emphasis supplied

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Compliance Trends / Best Practices

Risk Based Training

• What training have employees in relevant control functions received?
• Has the company provided tailored training for high-risk and control employees that addressed the risks in the area where the misconduct occurred?
• What analysis has the company undertaken to determine who should be trained and on what subjects?

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Compliance Trends / Best Practices

Form/Content/Effectiveness of Training

• Has the training been offered in a form and language appropriate for the intended audience?
• How has the company measured the effectiveness of the training?

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Communication About Misconduct

- What has senior management done to let employees know the company’s position on the misconduct that occurred?
- What communications have there been generally when an employee is terminated for failure to comply with the company’s policies, procedures, and controls (e.g. anonymized descriptions of the type of misconduct that leads to discipline)?

Availability of Guidance

- What resources have been available to employees to provide guidance relating to compliance policies?
- How has the company assessed whether its employees know when to seek advice and whether they would be willing to do so?
Taking Behavior Into Consideration

• Regulators are targeting behavioral aspects of firms and their business activities

• Check the box compliance mindset is not sufficient

• Training needs to focus on a “should we” rather than a “could we attitude”

• Proper cultural communication becomes important in predicting and stopping unwanted behavior

Customizing Your Training Courses

Cultures and Communication

• Good communication differs from culture to culture

• What happens when you need to communicate across geographical and/or functional and even spiritual cultures?

• Edward Hall (US Anthropologist) developed the concept of Low Context vs. High Context Cultures
Customizing Your Training Courses

Low context cultures

Good communication is:

• Precise, simple, explicit and clear
• Messages are understood at face value
• Repetition is appreciated for purposes of clarity as in putting messages in writing

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High context cultures

• Communication is nuanced, sophisticated and layered
• Messages are often implied but not plainly stated
• Less is put in writing more is left open to interpretation
• Understanding may depend on reading between the lines

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Color is a form of non-verbal communication...color psychology

Robert Plutchik’s Color Wheel of Emotions

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Color Psychology

Different hues have the potential to make people feel certain ways

- Red is often interpreted to represent passion, love, energy
- Different shades and tints of red can convey certain emotions
- Example: light red evokes different meaning than dark red

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Color Theory

- Blue: trust, smart, calm, faith, natural, stable, power
- Red: love, intimacy, energy, sale, passion, anger, hunger
- Black: bold, rich, power, mystery, elegance, evil, strength
- Green: soothing, eco-friendly, natural, envy, jealousy, balance, restful
- Yellow: cheer, attention, childish, fresh, warmth, energy, optimism
- Orange: health, attraction, standout, thirst, wealth, youthful, happiness
- Pink: tenderness, sensitive, caring, emotional, sympathetic, love, weak
- Purple: royal, mysterious, arrogant, luxury, childish, creative, sadness

Customizing Your Training Courses

“Behavioral Learning Artists”

Why not use color to evoke behavior and emotional connection to learning?

- Cool Colors: soothing
  - Blue, green, purple: usually remind people of the sky...something far away

- Warm Colors: energizing
  - Red, yellow, orange: correlate with sunshine and heat

- Active (bright) vs. Passive (muted) colors

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Internationalization

- People of different cultures may have different thoughts and emotions about certain colors
- But some basic generalities exist:
  - Green sparks creativity: associated with nature and regrowth
  - Red reduces analytical thinking: when humans see the color red their reactions become faster and more forceful but the increased energy is short lived

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Customizing Your Training Courses

Internationalization

- Blue is most universally accepted
- Yellow isn’t usually a hit
- Orange is associated with good value (ING/Home Depot)
- Pink drains peoples energy
- White causes people to reflect on their own thoughts. Often leads to boredom or thoughts of mortality

Guy Deutscher, Through the Language Glass: Why the World Looks Different in Other Languages as cited by Sally Augustin
HBR March 13, 2012

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Working with your Compliance Vendor

What should I be looking for in a compliance training vendor?

- Is the vendor serving a global audience?
- Are their stories designed to be universal to reach the widest audience?
- Does the vendor simply localize translated content or do they conduct a cultural pass to ensure the content will resonate?
- How often does the vendor update their courseware including media?
- Does the vendor have customization capabilities that would allow for regional content to be delivered?
- Does the vendor have global clients that you can speak to as a reference?

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Working with your Compliance Vendor

What questions should I ask vendors?

- How customizable is your off-the-shelf content? What can and can’t I customize?
- How can clients regionalize content to reach global audiences?
- How are translations delivered?
- Do you offer regional media for localized versions of the courseware?
- Can we use our own regional video or media within your courses?

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The Future of Compliance Training

How will technology help to advance Compliance Training?

- Advances in Education technology will provide Compliance professionals with deeper insight into the effectiveness of training programs
- Innovations will provide opportunities for employees to apply learning in simulations while learning from each other

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E-Learning Market Trends - 2017

- Automation
- Microlearning
- Content as a Service
- Mobile Learning
- Big Data driven Learning programs
- Informal / Continuous Learning
- Cloud Based Services
- Personalized Learning
- Learning EcoSystem / Integration
- Industry Specific content
- Gamification / Edutainment
Takeaways

• Reaching global learners takes time and effort to understand your audience

• A vendor’s off-the-shelf compliance training course is a starting point….its effectiveness will require customization to regionalize content

• Adapt to changes in regulatory expectations. Risk analysis that identifies opportunities to strengthen values based ethical behavior is favored over “check the box” rules based training.

• Ask tough questions of your compliance training vendor to ensure global success of your training program

• Stay tuned to the future of compliance training….technology will help provide your with more insight and opportunities to create a continuous learning culture in your organization

Contact Information

For more information, contact:

Rob Strulowitz
604-992-1686
strulowitz@gmail.com

Sandra Bograd
201-404-0786
sbograd@mac.com