



NAVEXGLOBAL®
The Ethics and Compliance Experts

2015 Ethics & Compliance Training Benchmark Report

Benchmarking Data and Insights to Help you Engage an Evolving Workforce

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I. INTRODUCTION

In 2015, NAVEX Global partnered with an independent research agency to survey ethics and compliance professionals with responsibility for administering training across their organizations. The goal was to determine their top priorities and challenges.

The findings represent responses from 677 individuals responsible for ethics and compliance programs (see respondent profile in the next section for additional details). This report presents the results of our research, providing insights and analysis on such questions as:

- How well are training programs adapting to the needs of an evolving workforce and emerging risks?
- How are organizations deploying their resources related to training—both in dollars and FTEs?
- Does training help organizations defend their organizations from legal or regulatory risk?
- What training approaches are organizations using?
- How are organizations training their global workforce?
- What are key training trends on the horizon?
- How are organizations managing and deploying their training budgets?
- What threats do training programs face?

How To Use This Report

Most organizations have compliance training programs in place, and they anticipate that these programs will help protect their organization and build their culture. However, when programs stagnate, rely on low-quality, low-credibility content or don't evolve to meet emerging risks or learners' needs, organizations' exposure to legal and reputational risk grows. This report will help you:

- Access information you need to evaluate the quality of your training program and whether your program is protecting your organization—or putting it at risk
- Benchmark your training program against peers, industry norms and best practices
- Pinpoint areas where your program may need to grow or evolve
- Leverage our data and recommendations to improve your program effectiveness

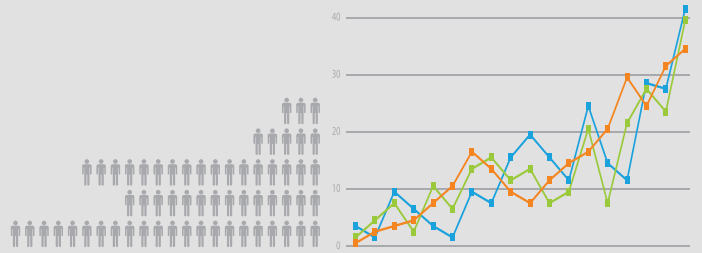
We hope you will find this report useful—and that it will provide both inspiration and motivation to make your ethics and compliance training program even more effective.

What is Ethics and Compliance Training?

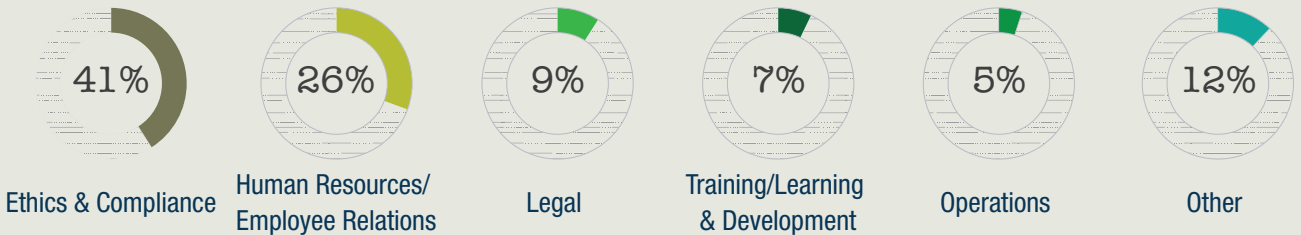
Unless otherwise specified, for the purposes of this report, the term “ethics and compliance training” or simply “training” includes all forms of training on ethics and compliance topics, including online, live, email, in-person, virtual and instructor-led training.

SURVEY RESPONDENT PROFILE

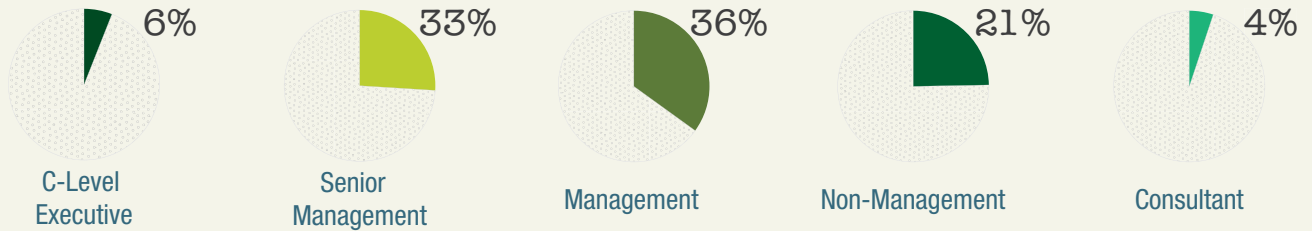
= 677



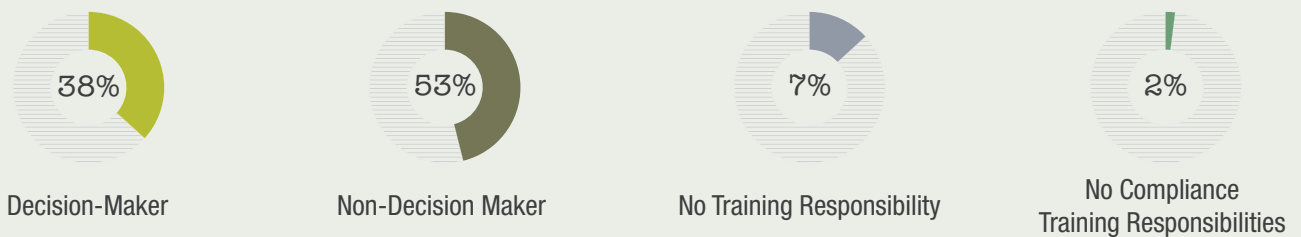
Job Function



Job Level



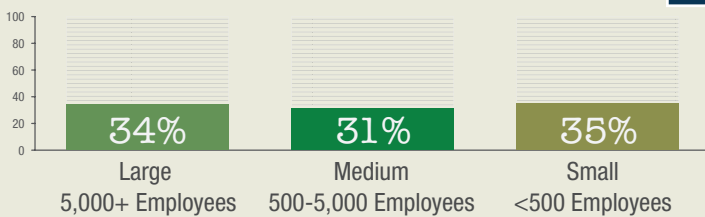
Training Decision Maker Status



Organization Size



Annual Revenue



SURVEY RESPONDENT PROFILE

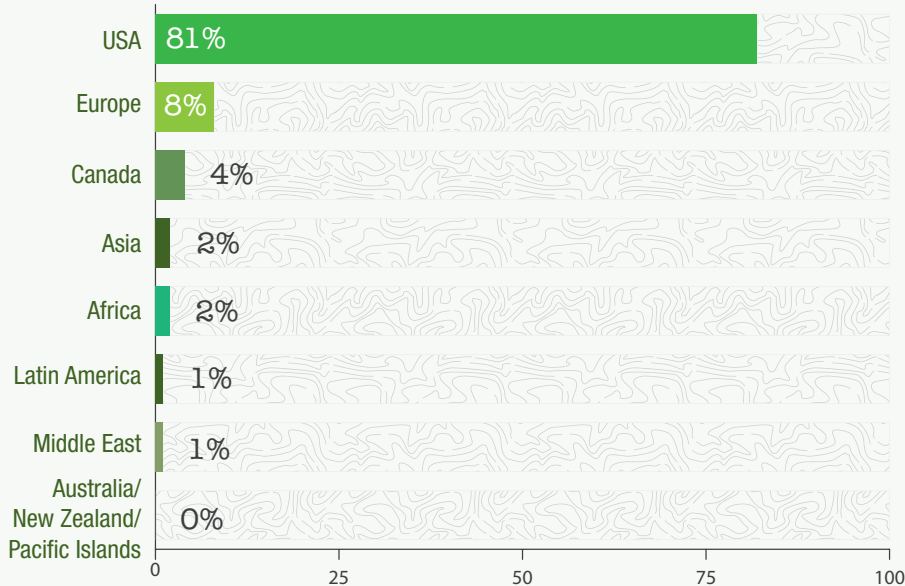
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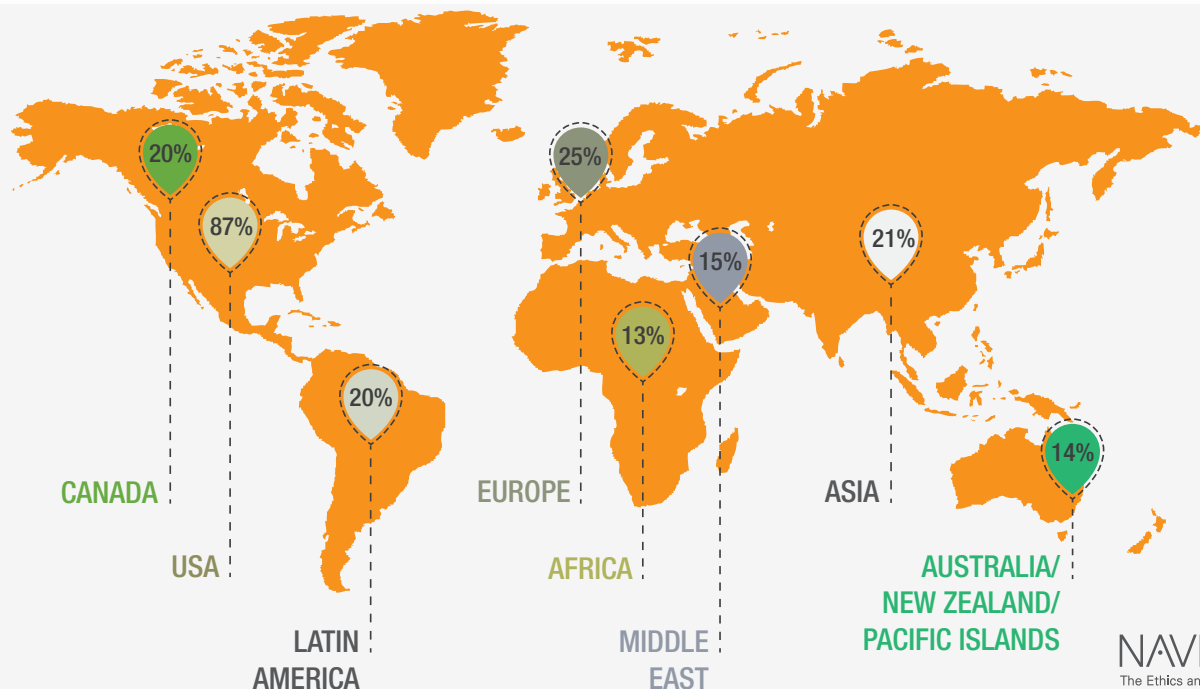
Number of Respondents by Industry

- 108 Healthcare Providers
- 71 Manufacturing
- 59 Government
- 57 Banking & Financial Services
- 57 Business & Professional Services
- 49 Education
- 45 Insurance
- 34 Energy, Utilities, Oil & Gas
- 31 Not For Profit
- 30 Technology
- 18 Retail
- 17 Transportation & Warehousing
- 15 Aerospace & Defense
- 13 Pharmaceuticals & Life Sciences
- 11 Leisure, Recreation & Entertainment
- 12 Construction
- 10 Chemicals
- 9 Healthcare Products
- 7 Agriculture, Food & Beverage
- 6 Accommodation & Food Services
- 6 Real Estate
- 12 Other

Geography of Headquarters



Regions Where Respondents Conduct Ethics & Compliance Training



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III. EXECUTIVE SUMMARY

Robust ethics and compliance training programs not only have the ability to help protect organizations from legal, financial, regulatory and reputational risk, they are also instrumental in creating a corporate culture that helps inspire ethical behavior.

This year's survey data reveals the drivers behind effective training programs, detailing the top objectives, pain points and strategies of ethics and compliance professionals across many industries and organization sizes. The following key themes emerged from our data:

- **Culture is the Top Objective (Once Again):** “Creating a culture of ethics and respect” is the number one training program objective (the top choice for 46 percent of respondents), as it was for last year's respondents. Creating a culture of ethics and respect tends to require a much greater investment of time and resources than “complying with laws and regulations”—the second most-cited objective at 31 percent. The top objective of culture enhancement puts even more pressure on training programs—and ethics and compliance programs overall—to impact culture for the better.
- **Training Time for Senior Leaders and Boards of Directors is on the Decline:** While respondents reported that annual training time for non-management employees rose by about 60 minutes from last year (to 7.1 hours) and training times for middle managers stayed about the same (at 6.5 hours), senior leader training times dropped by nearly 90 minutes to 4.4 hours. Board training times also declined by an hour (to 2.0 hours). Losing training time for boards and senior leaders is a disconcerting trend—particularly because without the most senior leaders setting the right “tone at the top,” compliance professionals will find it very difficult, if not impossible, to meet their stated top objective of creating a strong culture of ethics and respect.
- **Budgets Are Fragmented and Flat:** As new risks emerge and multiply, the need to do more with less in training programs has never been greater. Respondents indicated that “not enough budget” is the fourth greatest challenge to their training program, and one in four respondents indicated they do not have a dedicated training budget at all. Of those respondents who do have a dedicated budget, it is often sourced from multiple departments. Without a dedicated budget, it is extremely challenging to plan properly, or demonstrate ROI on a training investment. The majority of respondents (71 percent) anticipated their budgets will stay flat over the next 12 months.
- **Employee Cynicism and Fear of Retaliation Top Threats to Training Effectiveness:** In a new benchmark this year, we asked respondents to report the biggest challenge to their training program's effectiveness. Their number one concern was employee cynicism (37 percent), with employee fear of retaliation for speaking up about misconduct a close second (35 percent). Progress can certainly be made on reducing fear of retaliation through training, but combatting cynicism is a tougher issue to tackle, requiring organization-wide alignment between stated values and actions, along with consistent, authentic efforts to create a healthy organizational culture.
- **Training Programs are Evolving—Slowly:** From addressing key risk topics (especially cybersecurity and social media) to evolving training format deliveries (such as gamification and collaborative training), our year-over-year findings indicate that programs are slow to adjust to emerging trends. Training program managers may need to consider ways to build more responsiveness into their programs to ensure they are keeping up with their organization's shifting needs and risks—and heightened standards imposed by regulators.
- **Multi-Year Training Program Planning Increasing:** The number of respondents who reported that their organizations are developing multi-year training plans (also known as curriculum maps) rose from 16 percent in 2014 to 33 percent this year. This kind of multi-year planning will help organizations ensure that they are training the right audiences at the right time on the right topics at the right frequency.

III. EXECUTIVE SUMMARY

- **Aligning Training Programs with Risk Still Not the Norm:** A trend we hope to see gaining in momentum in over the next several years is improving the process for assessing and assigning course topics based on an organizational risk assessment. In this year’s findings, only 15 percent of respondents report that they plan their program this way. The ability to achieve this level of program maturity may be a ways off for most organizations, but it should represent an important goal.
- **Addressing the Needs of an Evolving Workforce—Especially Millennials:** New in our survey this year was a question about what respondents are doing to engage millennials with training. The top three adaptations respondents indicated that they have or will be making are deploying high-quality content (45 percent) deploying microlearning (44 percent) and offering more on-demand or self-paced learning (37 percent). Although millennials may be driving much needed change to training programs, adaptations should not be targeted at millennials, but should be utilized to benefit the entire workforce.
- **Legal Defensibility of Training is a Potential Blind Spot:** Despite the fact that nearly half (48 percent) of respondents used training in a legal defense over the past three years, legal defensibility was among the lowest responses on the “top objectives” list for training programs. That we see so many respondents de-emphasizing legal defensibility could simply be that programs are focused on culture and prevention that the defensible nature of training takes a back seat.

In a time of tight budgets and increasing scrutiny, ethics and compliance training programs are not immune from the expectation to maximize ROI and show a tangible return on investment. Compliance professionals must continue to mature their programs, demonstrating and creating value by measuring and reporting on effectiveness, maximizing efficiencies and ensuring strong senior-level executive support of—and funding for—program goals.



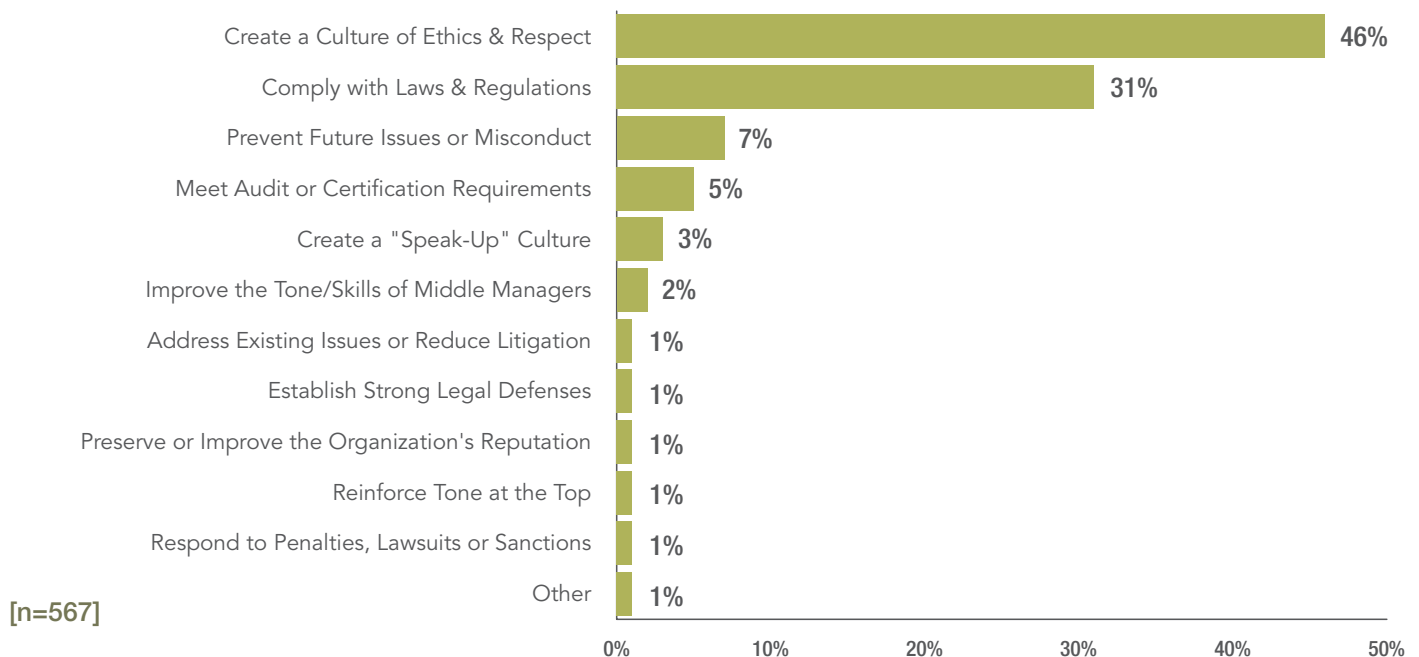
THE STATE OF ETHICS & COMPLIANCE TRAINING TODAY



1. Training Objectives

FINDINGS: When asked to force-rank their top ethics and compliance training objective, creating a culture of ethics and respect was the objective most respondents ranked as number one. Overall, the top three objectives remained the same from our 2014 findings when we asked respondents to prioritize (rather than force-rank), with creating a culture of ethics and respect as the clear top objective, followed by compliance with laws and regulations and preventing future issues or misconduct.

Which Ethics and Compliance Training Objective Is Most Important for Your Organization? (Respondents' Ranking of Their Number One Objective)



ANALYSIS: In this year's survey, we not only asked respondents their training program objectives, but asked them to force-rank their number one objective. The top three responses held their same place as our findings from 2014, but preventing future misconduct was a much lower priority. Although respondents are still very focused on creating a culture of ethics and respect, behaviors (such as making purchasing decisions based on cost rather than program engagement and effectiveness) will continue to interfere with progress against this objective.

Training programs can also be sabotaged by factors unrelated to the program itself, including how well an organization's overall ethics and compliance program is performing. Ensuring close alignment among all ethics and compliance stakeholders is critical to achieve a culture-related goal.

We added an option to the list this year on improving the tone and skills of middle managers, recognizing the critical role that managers play in driving culture. Despite the importance of this objective, it scores incredibly low against the other objectives. As programs mature and organizations become better at measuring the effectiveness of training (especially as it relates to middle management) they will likely discover that they need focus more vigorously on this objective.

Six Essentials for a Culture-Changing Ethics and Compliance Program

Ethics and compliance training alone cannot ensure a culture of ethics and respect in an organization, but it is a crucial tool in achieving the goal. Following are six essential characteristics of organizations whose ethics and compliance programs are truly culture-changing:

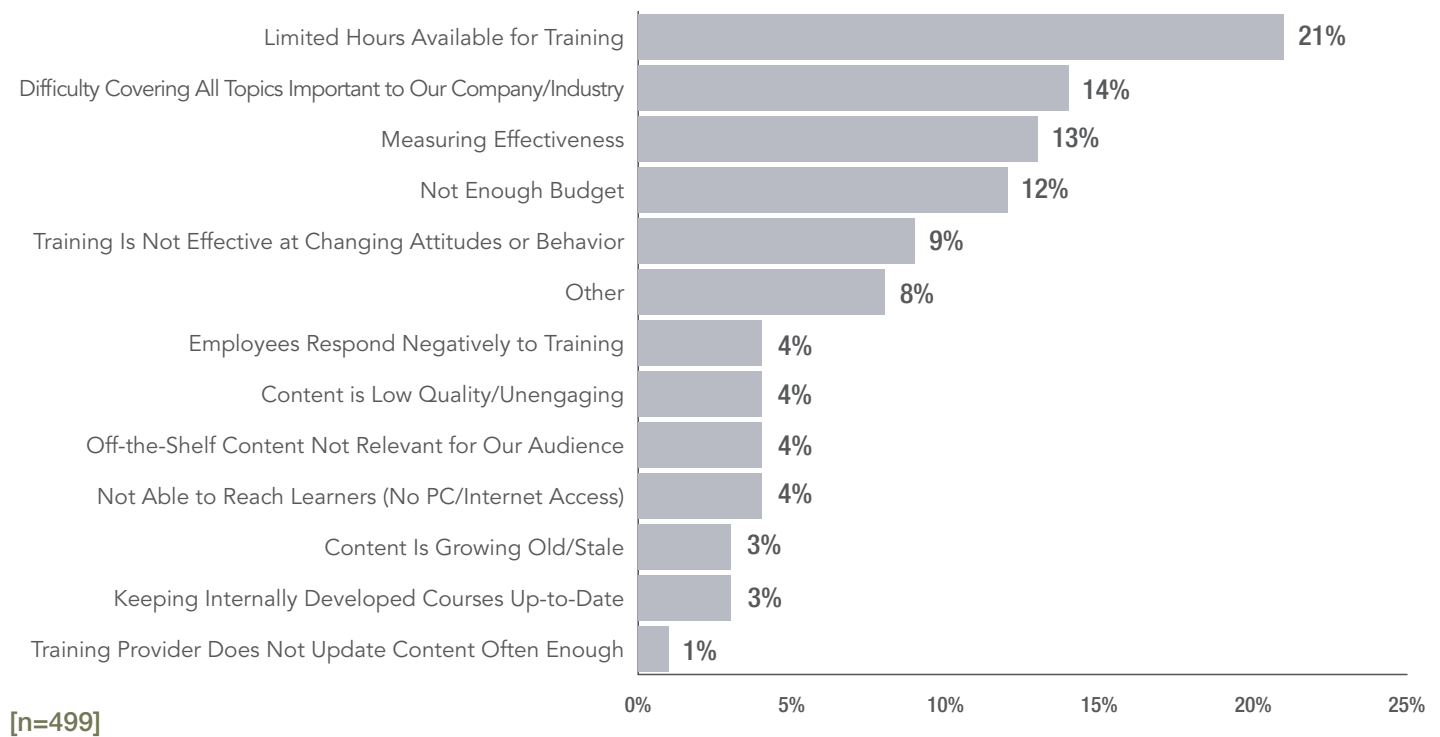
1. **Clear and consistent limits of acceptable behavior.** Standards are written down, easy to understand and relevant, trained on and can be easily accessed and referenced by employees in codes of conduct, policies and training. Consequences for stepping outside the limits are clear.
2. **Board and management are committed to ethics and compliance.** From the top leader to the lowest level supervisor, company leaders actively support the ethics and compliance program, and advocate for high-quality, regular training on key areas of risk and speaking up about concerns.
3. **No marginalization of ethics, compliance and legal requirements—or staff.** Ethical business practices must remain an integral part of everyone's responsibilities. Training and awareness educates employees on business values, ethics, compliance and legal responsibilities, and helps keep up a cadence of reinforcement.
4. **Employees can comfortably ask questions and raise concerns.** Training employees on their options—and duty—to report issues of concern, and educating them about their options for doing so (from an anonymous hotline to a web intake form) is critical. Training managers on reporting and retaliation can also help employees feel assured that an organization will hear and address their concerns. And metrics showing that they use these tools to ask questions is a sign of a healthy, open culture.
5. **Goals and incentives do not exert pressure on employees to step over the line.** Manager training and awareness on the dangers of pressure plays a preventative role in avoiding unethical decision-making, and helps ensure that managers understand that their employer cares not just about getting the job done, but how it gets done.
6. **Poor conduct and retaliation are not tolerated.** Nothing sows cynicism faster in the workplace than a senior leader or sales superstar getting away with misconduct, or a manager who retaliates against those who speak up. This makes it especially important to train regularly and discipline misconduct consistently.

Adapted from NAVEX Global's Ethics & Compliance Matters blog article, "Building a Culture-Changing E&C Program: Six Essentials" by Mary Bennett, Vice President, Advisory Services, NAVEX Global and Bob Conlin, President & CEO, NAVEX Global, blog.navexglobal.com

2. Training Challenges

FINDINGS: When asked to force-rank their top ethics and compliance training challenge, limited time for training rose to the top. Measuring effectiveness and covering all topics relevant to an organization or industry are other primary challenges for substantial minorities of respondents. Of those who responded “Other” and wrote in their own answer, the most prevalent issue raised was related to lack of management support and engagement.

What Is the Top Challenge to Your Organization When It Comes to Ethics and Compliance Training? (Respondents’ Ranking of Their Number One Challenge)



ANALYSIS: The top challenges of limited hours available, difficulty covering the necessary topics, measuring effectiveness and budget constraints continue to plague training programs.

Among these challenges, organizations should consider honing in on improving their ability to measure effectiveness. Senior leaders need to see that your program is working, has a positive impact on culture and that it provides a return on investment. This requires planning, budgeting, execution and analysis. Measuring and demonstrating program effectiveness will put compliance professionals in a better position to assess what is and is not working with their current program and make necessary changes to improve the program. And it will also put them in a much better position to ask for increased budget and additional training hours (if necessary) to support the organization’s needs and tackle other program challenges.

3. Organizational Issues That Threaten to Undermine Training Effectiveness

FINDINGS: Employee cynicism, fear of retaliation and middle manager misbehavior are the top three concerns respondents indicated could undermine the effectiveness of their training programs.

Which of the Following, if Any, Are Concerns That Could Undermine Compliance Training in Your Organization?



Note: Because respondents could choose more than one option, percentages total more than 100%.

ANALYSIS: These findings indicate that serious, culture-impacting (and risk-creating) concerns are present in many organizations. The presence of any one of these issues in an organization (even more so when more than one issue is present) could severely compromise the effectiveness of training. No matter how strong the training message may be, culture (the way things really get done) will trump training.

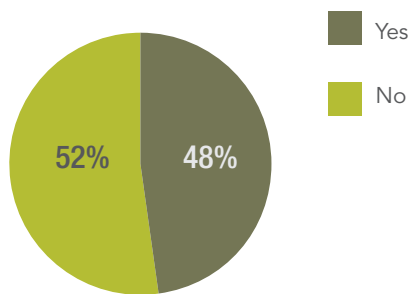
Employee cynicism (37 percent) and fear of retaliation (35 percent) are particularly damaging issues—especially when combined with managers who are not exhibiting the right leadership values (34 percent), or who downplay complaints (26 percent). Learners very quickly discount training when these negative conditions exist.

Senior leaders and boards need to appreciate the overall organizational risks that are created when an organizational culture is unhealthy. Tactics such as linking performance ratings, promotions and pay to corporate values are a step in the right direction. But senior leaders must also provide appropriate executive level support for the program and hold middle managers accountable. And the compliance program must help overcome employee cynicism with effective, engaging and high-quality training that sends a clear message to employees about an organization's commitment to creating a strong culture of ethics and respect.

4. Use of Training in a Legal Defense

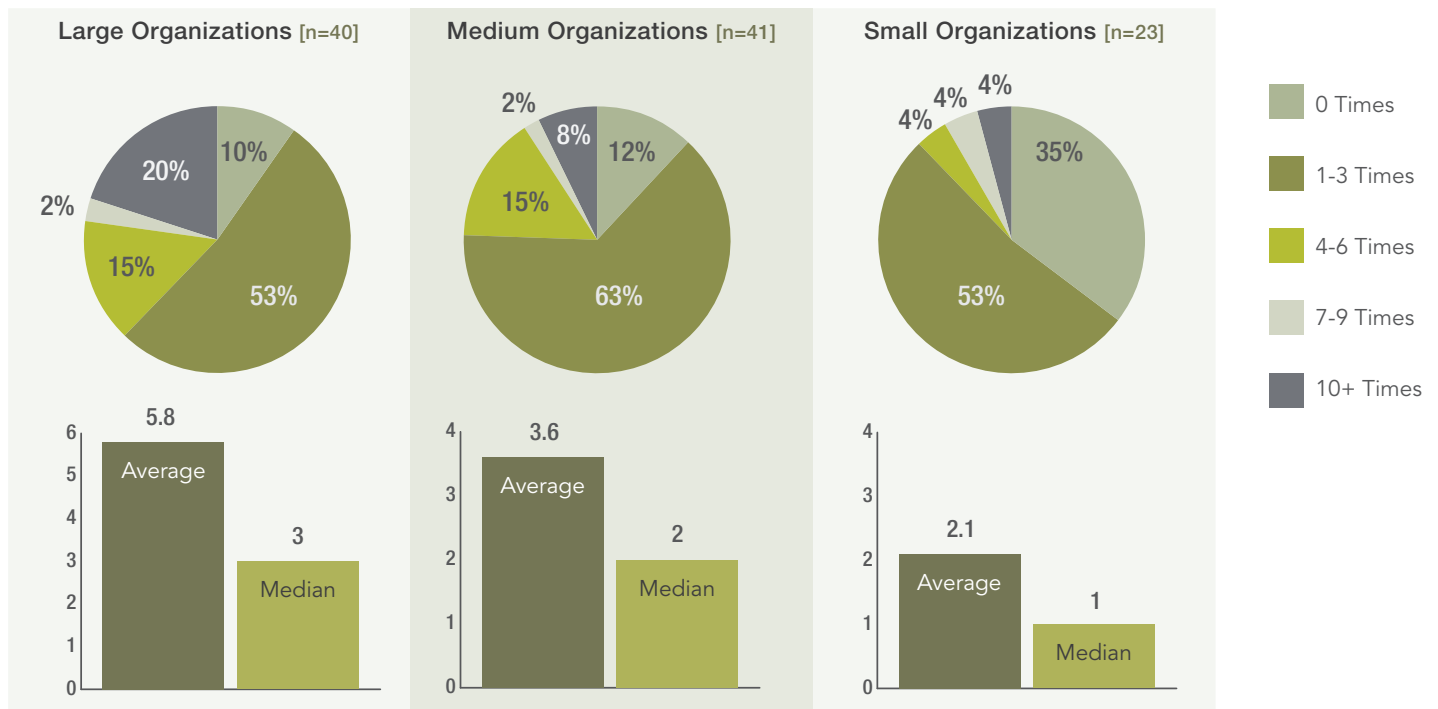
FINDINGS: Nearly half of respondents reported that they have used training in the past three years in a legal defense, agency action or to help secure a better position in a settlement negotiation. Of those respondents, fifty-seven percent used it one to three times, and another 27 percent used it four or more times. Medium companies are just as likely as large companies to have used training to defend their organization in a lawsuit. Thirty-six percent of both large and medium companies have used training for such purposes, compared to 19 percent of small companies.

Has Training Ever Been Used to Defend Your Organization in a Lawsuit, Agency Action or to Help Secure a Better Position in a Settlement Negotiation?



[n=254]

By Organization Size: How Many Times in the Last Three Years Has Your Organization Used Training as a Legal Defense?



Use of Training in a Legal Defense (continued)

ANALYSIS: Training can play a critical role in helping defend organizations when they face a legal or agency proceeding. In virtually all areas of compliance, enforcement agencies routinely evaluate the quality and frequency training as part of their decision-making process. When investigating charges, the EEOC and state agencies routinely ask about employer training programs and routinely mandate implementation of training when violations are found. In some instances in the past several years, agencies such as the SEC and DOJ have issued deferred prosecution agreements to organizations facing serious criminal charges, in part by recognizing the quality of their training program efforts.

Organizations creating training internally or purchasing from a vendor (regardless of format or topic) must consider as part of their buying criteria how the training will be received by judges, jurors and enforcement officials. These stakeholders have seen many training programs, and can easily detect “check-the-box” approaches.

Training will certainly have an impact when offered up in a legal proceeding; the key is to ensure you have deployed training that has a positive impact and not a negative one.



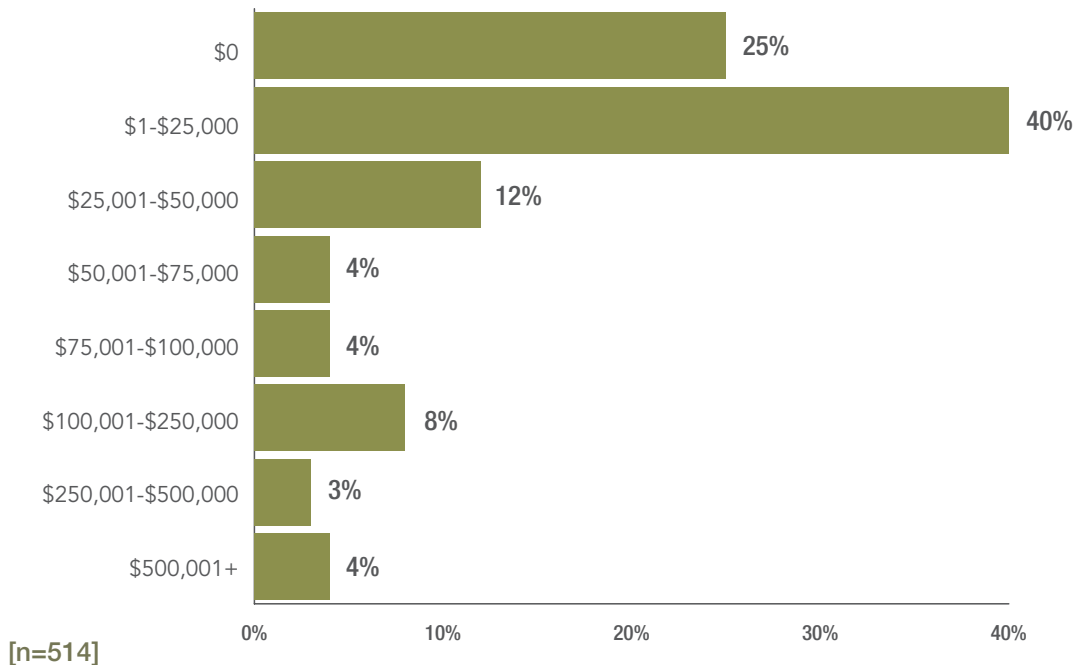
BENCHMARKING ETHICS & COMPLIANCE TRAINING



1. Training Budgets

FINDINGS: One quarter of respondents indicated that their organization does not have a dedicated budget for ethics and compliance training. Of the respondents who do have a dedicated training budget, most source that budget primarily through their human resource/employee relations department or their ethics and compliance department. However, many departments may be involved in sourcing training budgets—on average, 2.3 departments are involved. Our findings also revealed that the majority (71 percent) of respondents who have dedicated training budgets anticipate those budgets will stay the same over the next 12 months.

What Is Your Organization’s Annual Dedicated Budget for Ethics and Compliance Training?

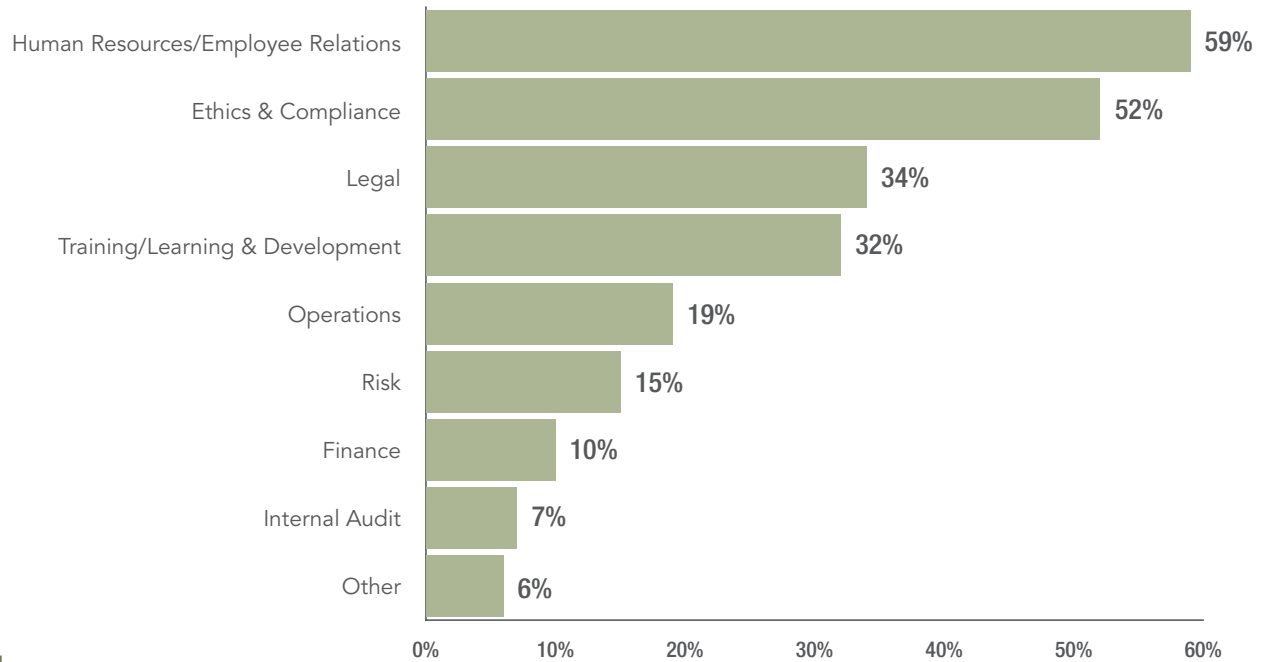


IV. KEY FINDINGS

Benchmarking Ethics & Compliance Training

Training Budgets (continued)

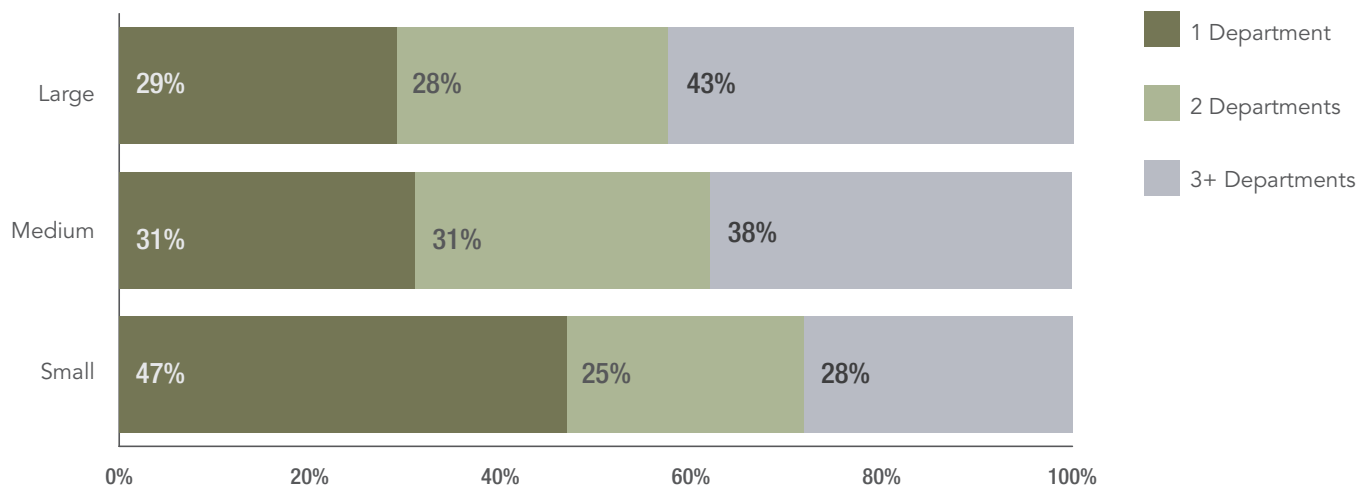
Which Departments Help Pay for Ethics and Compliance Training?



[n=514]

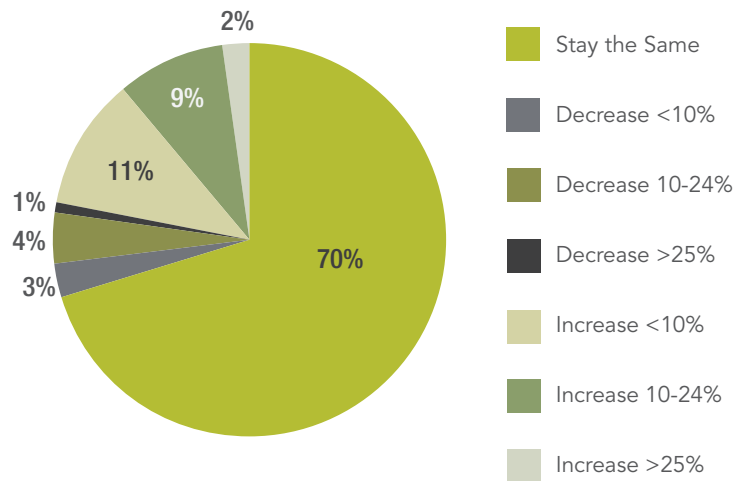
Note: Because respondents could choose more than one option, percentages total more than 100%.

By Organization Size: From How Many Departments Do You Source Budget for Compliance Training?



Training Budgets (continued)

Planned Investment in Training Over the Next 12 Months



[n=379]

ANALYSIS: Budgeting is an incredibly important part of creating a successful ethics and compliance training program. Despite this, one in four respondents (25 percent) said they do not have a dedicated training budget.

As programs struggle to meet their primary objective of improving corporate culture, as well as cover more topics and deploy courses of higher quality, it is essential that—at a minimum—budgets do not decline.

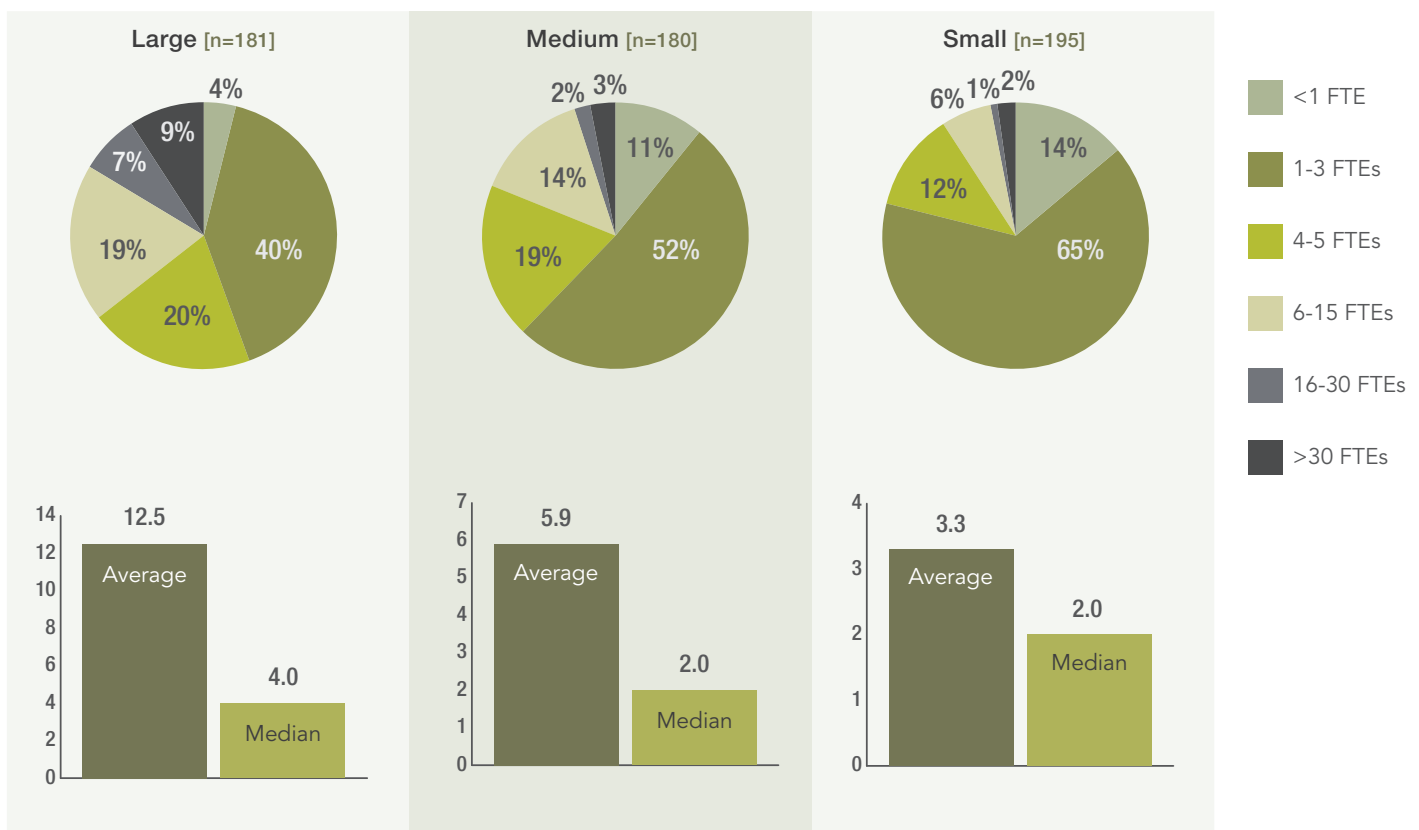
For organizations with divided ownership over training budgets—or those who must get buy-in from multiple departments on budget contributions for training (our findings indicate that 42 percent of large organizations, 37 percent of medium organizations and 28 percent of small organizations source budgets from more than three departments)—budgeting processes can be fractured and difficult. Consolidating the budget under one department can help reduce challenges. If fractured budget contributions exist, seeking early alignment on key training attributes and objectives is especially critical.

As compliance professionals become more proficient at measuring effectiveness and demonstrating return on investment, they will be in a better position to protect and grow training budgets, allowing them to better align their program with organizational risks.

2) Training Program Full-Time Employees (FTEs)

FINDINGS: This is a new benchmark added to this year's survey. Respondents indicated that, on average, nine employees are responsible for training in their organizations, but the median is just three. When considering the data by organization size, we see that the median number of FTEs at large companies is four, while small and medium organizations both have a median of two FTEs.

By Organization Size: How Many Full-Time Employees (FTEs) in Your Organization Are Responsible for the Management, Creation or Delivery of "Live" or "Online" Ethics and Compliance Training?



ANALYSIS: As with all elements of an effective compliance program, one size does not fit all. The right number of FTEs dedicated to a training program should be based on the needs of the individual organization. Those needs should be revealed by an assessment of what training resources are required to protect the organization and meet its stated goals. Not enough staff will cripple the program; too many staff members can create additional and unnecessary budget constraints.

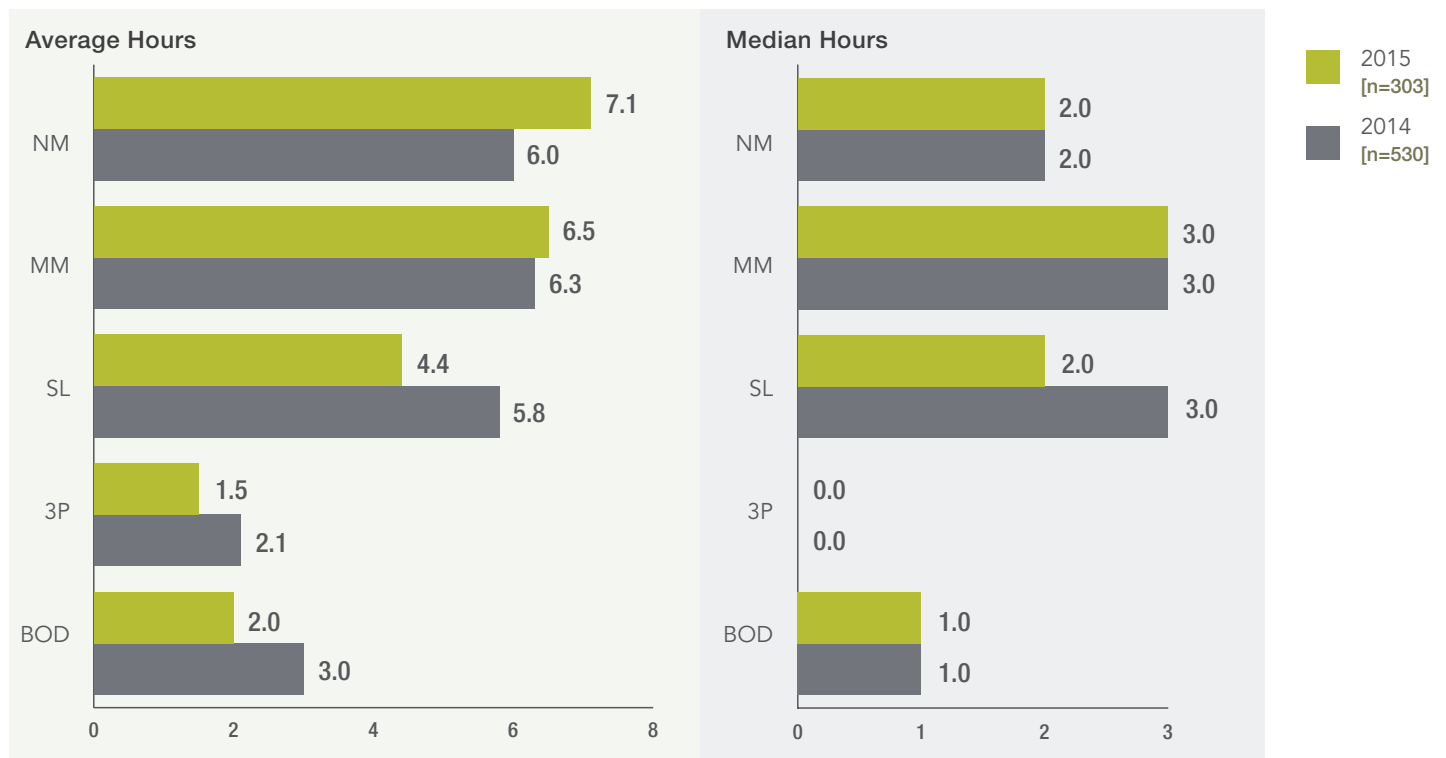
3. Annual Training Hours

FINDINGS: On average, respondents indicated that non-management employees are receiving more training than reported last year by a significant amount—an increase of slightly more than one hour over last year’s figures. Third party training time fell significantly, from an average of 2.1 hours in 2014 to an average of 1.5 hours this year. Training time for middle managers remained nearly the same. However, training for senior leaders declined from an average of 5.83 hours to an average of 4.38 hours—nearly a 90-minute drop. Training time for boards of directors also declined, dropping from an average of 3.0 down to 2.0 hours.

Looking at training hours by industry, we see that the chemicals industry is doing by far the most training across all learners, followed by banking and financial services. While healthcare providers such as hospitals and clinics deploy a fair amount of training, the healthcare products industry is doing the least. *Note: Some of the industry data provided may be skewed due to a small number of respondents in a particular industry.*

How Many Hours of Ethics and Compliance Training Do You Provide Annually to the Following Learners?

NM – Non-Management Employees **SL** – Senior Leaders **BOD** – Board of Directors
MM – Middle Managers **3P** – Third Parties



IV. KEY FINDINGS

Benchmarking Ethics & Compliance Training

Annual Training Hours (continued)

How Many Hours of Ethics and Compliance Training Do You Provide Annually to the Following Learners?

NM – Non-Management Employees

SL – Senior Leaders

BOD – Board of Directors

MM – Middle Managers

3P – Third Parties

INDUSTRY	Average Courses					Median Courses				
	NM	MM	SL	3P	BD	NM	MM	SL	3P	BD
Accommodation & Food Services [n=4]	6.8	5.3	2.0	0.0	0.3	3.5	5.5	1.0	0.0	0.0
Aerospace & Defense [n=10]	9.2	8.2	6.2	2.8	2.3	3.8	4.5	4.5	0.25	0.5
Agriculture, Food & Beverage [n=4]	5.0	2.6	2.6	0.0	0.4	2.0	2.0	2.0	0.0	0.25
Banking & Financial Services [n=28]	8.1	9.1	5.7	5.7	4.4	5.0	4.5	3.0	0.0	2.0
Business Services/Professional Services [n=22]	6.1	7.8	3.6	0.3	3.2	2.0	2.0	2.0	0.0	0.0
Chemicals [n=5]	22.8	21.4	6.8	2.4	3.7	15.0	25.0	3.0	1.0	1.0
Construction [n=6]	12.5	10.7	2.7	0.4	0.5	2.0	3.0	1.5	0.0	0.05
Education [n=16]	11.6	9.1	5.5	1.0	2.8	5.0	10.0	3.0	0.0	1.0
Energy & Utilities/Oil & Gas [n=13]	10.0	10.5	3.8	0.7	1.1	1.5	2.0	1.0	0.5	1.0
Government/Public Administration [n=29]	4.8	5.1	4.0	1.2	2.3	1.0	2.0	1.5	0.0	0.0
Healthcare Products & Services (Labs) [n=5]	1.2	1.6	1.4	0.0	0.2	1.0	1.0	0.0	0.0	0.0
Healthcare Providers (Hospitals/Clinics) [n=60]	7.3	4.3	3.6	0.6	1.5	2.0	2.0	2.0	0.0	1.0
Insurance [n=18]	6.0	4.2	3.7	5.1	1.4	3.5	3.5	3.0	0.5	1.0
Leisure, Recreation, Arts & Entertainment [n=4]	4.5	7.0	12.5	0.0	7.3	4.0	4.0	12.5	0.0	2.0
Manufacturing [n=28]	5.1	6.3	4.1	0.7	1.4	2.0	3.5	2.0	0.0	0.0
Not For Profit, Charitable Organizations & Foundations [n=13]	6.6	5.5	4.7	0.5	1.2	4.0	4.0	4.0	0.0	1.0
Other [n=4]	3.3	3.8	7.3	0.0	0.0	3.0	3.5	6.0	0.0	0.0
Pharmaceuticals & Life Sciences [n=10]	3.7	3.5	3.7	1.3	1.6	4.0	3.0	4.0	1.0	1.0
Real Estate [n=2]	1.5	2.5	1.0	0.0	0.5	1.5	2.5	1.0	0.0	0.5
Retail [n=5]	6.0	10.8	5.2	0.3	0.5	4.0	4.0	4.0	0.0	0.5
Technology (Software/Hardware/Telecom) [n=9]	3.1	3.3	3.6	0.4	0.8	2.0	3.0	3.0	0.25	0.5
Transportation/Distribution/Logistics/Warehousing [n=8]	9.9	9.9	8.1	1.0	2.4	3.0	3.0	3.0	0.0	0.5
All Industries [n=303]	7.1	6.5	4.4	1.5	2.0	2.0	3.0	2.0	0.0	1.0

Annual Training Hours (continued)

ANALYSIS: Increased training hours for non-managers and sustained levels of training for middle managers were positive indicators in this year's report. However, not all of this year's data swings were good.

The dramatic downturns in training times for senior leaders, boards of directors and third parties are cause for concern. It is critical for boards of directors and senior leaders to clearly understand and own their role in compliance program oversight. Both boards and senior leaders are responsible for setting "tone at the top," which has, arguably, a greater influence over a healthy organizational culture than any other single factor. Since nearly one in five respondents indicated that they have a concern their executive-level leaders are not communicating the importance of corporate values, this number should be increasing rather than declining. Even though it can be very challenging to secure seat time for these higher-level learners, training is essential for these audiences. Compliance professionals must continue efforts to make training easily accessible and high-quality to engage and impact behavior at this level.

If improving corporate culture is the top objective of training programs, ethics and compliance officers cannot afford to lose ground in training time for senior leaders, boards and third parties.

4. Annual Training Courses Deployed

FINDINGS: The average number of courses deployed per learner group stayed relatively stable year over year with a few exceptions, most notably an increase in the average number of courses deployed to non-management employees, and a decrease in the average number of courses deployed to boards of directors.

An industry-specific cut of data reveals that the insurance and chemicals industries deploy the most courses (they also are the leaders in the number of training hours, as noted in the prior section of this report), and the accommodation and food services industry deploys the fewest courses but still covers a fair amount of hours to employees and managers.

How Many Ethics and Compliance Training Courses Do You Deploy Annually to the Following Learners?

NM – Non-Management Employees

SL – Senior Leaders

BOD – Board of Directors

MM – Middle Managers

3P – Third Parties



IV. KEY FINDINGS

Benchmarking Ethics & Compliance Training

Annual Training Courses Deployed (continued)

By Industry: How Many Ethics and Compliance Training Courses Do You Deploy Annually to the Following Learners?

NM – Non-Management Employees

SL – Senior Leaders

BOD – Board of Directors

MM – Middle Managers

3P – Third Parties

INDUSTRY	Average Courses					Median Courses				
	NM	MM	SL	3P	BD	NM	MM	SL	3P	BD
Accommodation & Food Services [n=4]	1.8	1.3	0.7	0.0	0.0	1.0	1.0	0.0	0.0	0.0
Aerospace & Defense [n=9]	2.7	3.4	3.7	0.4	1.3	2.0	3.0	3.0	0.0	1.0
Agriculture, Food & Beverage [n=5]	3.4	1.8	1.8	0.5	0.2	2.0	2.0	2.0	0.5	0.0
Banking & Financial Services [n=23]	4.0	4.4	3.8	0.3	1.8	3.0	3.0	2.0	0.0	1.0
Business Services/Professional Services [n=21]	3.6	4.0	2.8	0.4	0.5	1.0	2.0	1.5	0.0	0.0
Chemicals [n=5]	4.8	5.8	3.6	0.5	0.3	5.0	5.0	3.0	0.5	0.0
Construction [n=5]	1.2	1.2	1.2	0.5	0.6	1.0	1.0	1.0	0.5	1.0
Education [n=16]	6.4	6.3	5.0	0.9	1.0	4.5	4.0	2.0	0.0	1.0
Energy & Utilities/Oil & Gas [n=14]	3.2	3.4	1.9	0.8	0.8	2.0	2.5	1.5	1.0	1.0
Government/Public Administration [n=29]	3.1	3.1	3.0	0.9	1.0	1.0	2.0	1.5	0.0	0.0
Healthcare Products & Services (Labs) [n=5]	1.4	1.4	1.4	0.0	0.0	1.0	1.0	1.0	0.0	0.0
Healthcare Providers (Hospitals/Clinics) [n=56]	3.2	3.6	3.1	0.7	0.9	2.0	2.0	2.0	0.0	0.0
Insurance [n=19]	7.4	4.4	3.3	7.5	1.1	2.5	2.5	2.0	1.0	0.0
Leisure, Recreation, Arts & Entertainment [n=4]	1.0	2.8	4.0	0.0	0.8	0.0	3.0	5.0	0.0	0.5
Manufacturing [n=26]	1.9	2.7	2.4	0.4	0.6	2.0	3.0	2.0	0.0	0.0
Not For Profit, Charitable Organizations and Foundations [n=12]	3.3	3.4	3.2	1.6	1.6	2.5	2.5	2.0	0.0	0.5
Other [n=4]	3.3	3.0	4.3	0.0	0.0	3.0	2.5	6.0	0.0	0.0
Pharmaceuticals & Life Sciences [n=9]	3.9	3.9	4.0	1.6	1.6	3.0	3.0	4.0	1.0	0.5
Real Estate [n=2]	0.5	1.0	1.0	0.0	0.5	0.5	1.0	1.0	0.0	0.5
Retail [n=5]	6.0	11.6	4.4	0.3	0.5	5.0	7.0	4.0	0.0	0.5
Technology (Software/Hardware/Telecom) [n=9]	3.6	3.7	3.7	0.7	1.2	2.0	2.0	3.0	0.5	1.5
Transportation/Distribution/Logistics/Warehousing [n=8]	5.8	5.1	3.4	0.7	1.0	3.5	4.0	3.0	0.0	0.5
All Industries [n=290]	3.7	3.8	3.1	1.1	0.9	2.0	2.0	2.0	0.0	0.0

Annual Training Courses Deployed (continued)

ANALYSIS: Consistent with an increase in training hours, non-management employees saw a slight increase in the number of courses deployed annually, from 3.27 in 2014 to 3.67 in 2015. Middle managers also saw a slight increase year over year (3.6 courses to 3.8 courses). And, consistent with the prior analysis on hours, both senior leaders and members of the board will receive fewer training courses in the coming year.

Deploying fewer courses, as a factor on its own, is not necessarily an alarming trend. However, when combined with a reduction in overall training hours, the findings reflect a decrease in attention on key learners, which ethics and compliance officers need to keep an eye on.

Effective Ethics & Compliance Training Helps Your Organization:

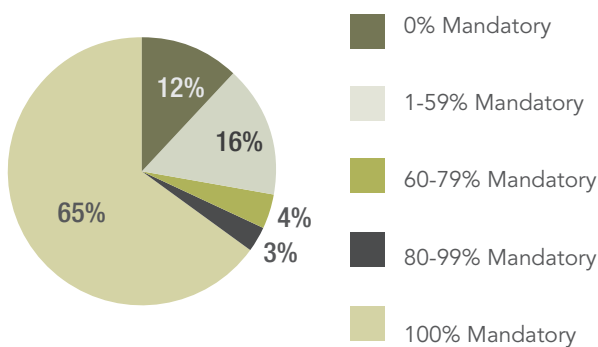
- Create a culture of ethics and respect
- Inspire ethical behavior, engaging learners and reducing cynicism
- Cover your most critical topics
- Protect and defend itself from legal, financial and reputational risk
- Maximize training time and budgets



5. Mandatory Training and Completion Rates

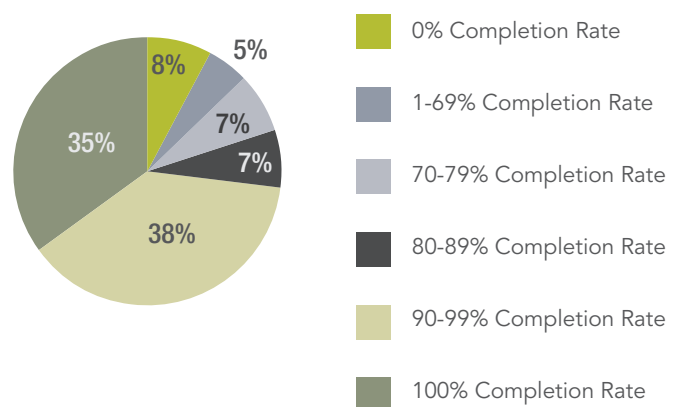
FINDINGS: Many respondents' organizations require employees to take ethics and compliance training: 66 percent of respondents indicated that all of their training topics are mandatory. Twenty-eight percent of respondents with mandatory training programs have completion rates below 90 percent.

What Percentage of Your Ethics and Compliance Training Courses Are Mandatory?



[n=311]

What Is Your Average Completion Rate for Mandatory Courses?



[n=301]

ANALYSIS: Many organizations require employees to take ethics and compliance training; 66 percent of organizations make all training topics mandatory, while an additional 11 percent make more than half of their programs mandatory. Mandatory training can help ensure that all employees receive required training, which can help build legal defenses and increase employee awareness of the risks facing their organization. However, in many organizations lack of follow through and low completion rates may be making "mandatory" a misnomer, undermining their efforts—20 percent of respondents with mandatory training programs have completion rates below 80 percent, and another 7 percent are between 80 and 89 percent. Low completion rates suggest that either managers are not holding employees accountable for completing the training, and/or that senior leaders are not committed to a true mandatory program. Either way, employees receive the message that training programs are optional, not essential.

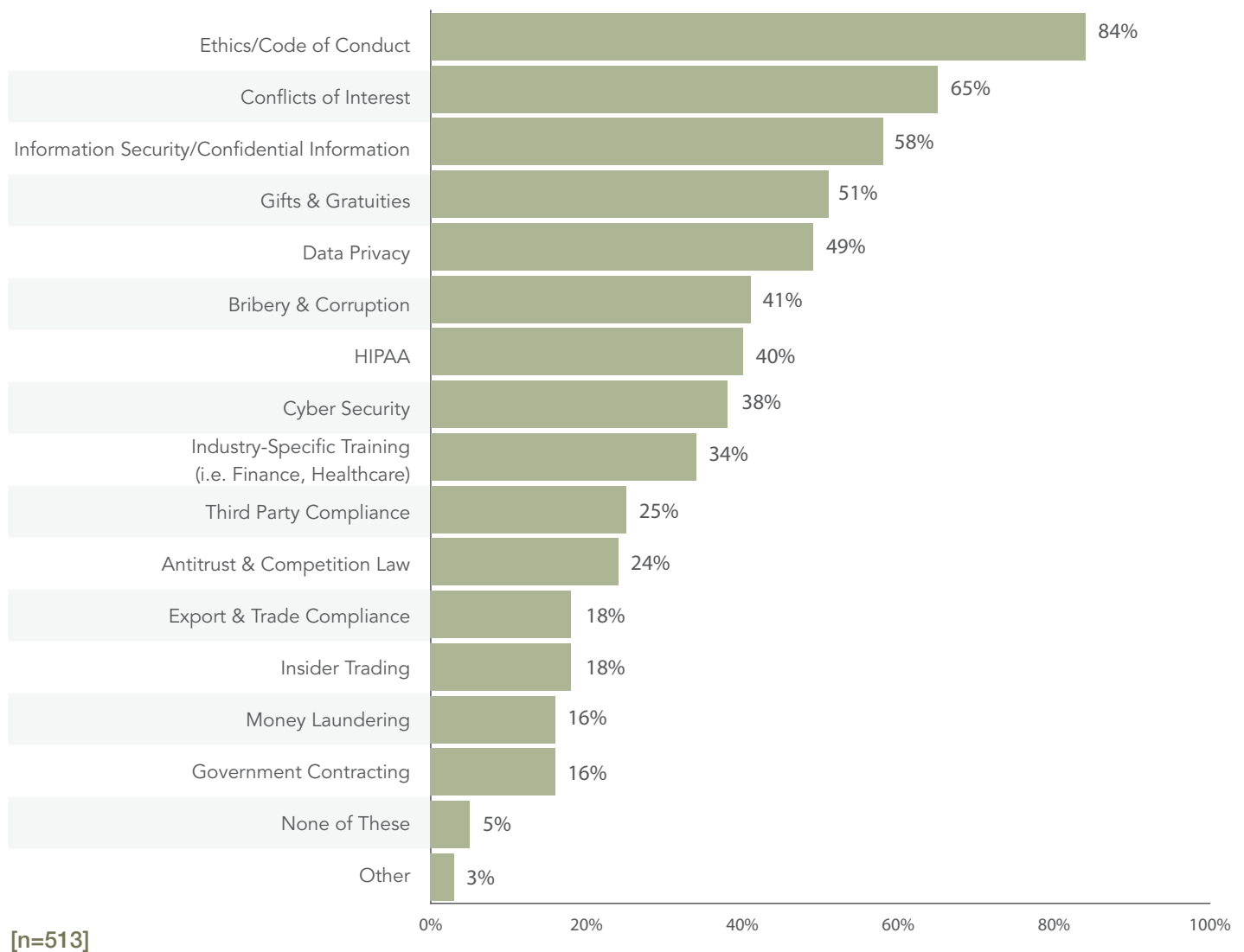
Ambivalence toward training undermines ethics and compliance program goals—particularly goals related to culture-building. Low completion rates can also impact the effectiveness of a legal defense (especially when an employee who failed to complete training engages in serious misconduct, or a region with low completion rates is plagued by misconduct).

Organizations should manage mandatory programs carefully, setting realistic completion rates and following through with managers to ensure that numbers are met. Prior alignment on consequences for failing to complete required training is an essential component of a mandatory program. Reporting on completion rates to senior management (by division, manager, group, etc.) will also help keep leaders aligned and focused on the goal completion rate.

6. Training Topics

FINDINGS: The top three topics stayed the same in our findings year-over-year, with ethics/code of conduct remaining the most-frequently trained on topic. The top three topics were also those that respondents indicated they would be most likely to train on using a blended approach (a combination of live and online learning). For HR/employment law topics, workplace harassment, discrimination and diversity and inclusion were the top three training topics, and respondents were more likely to take a blended training approach to these courses. Respondents also indicated that they are training on an average of nine topics annually.

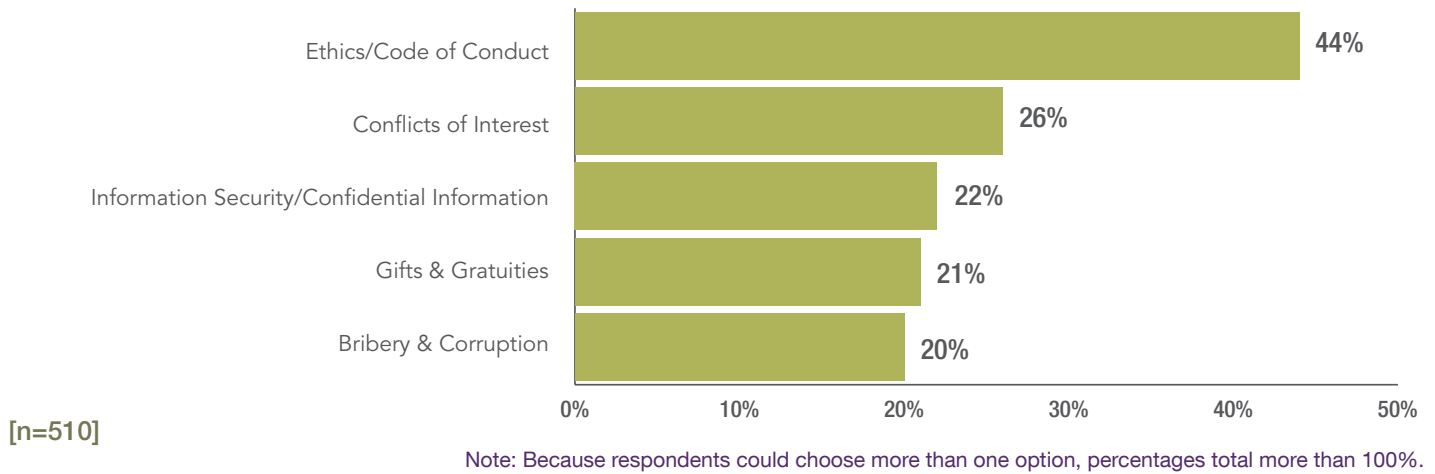
Which of the Following Topics Will Your Organization Train on in the Next Two to Three Years?



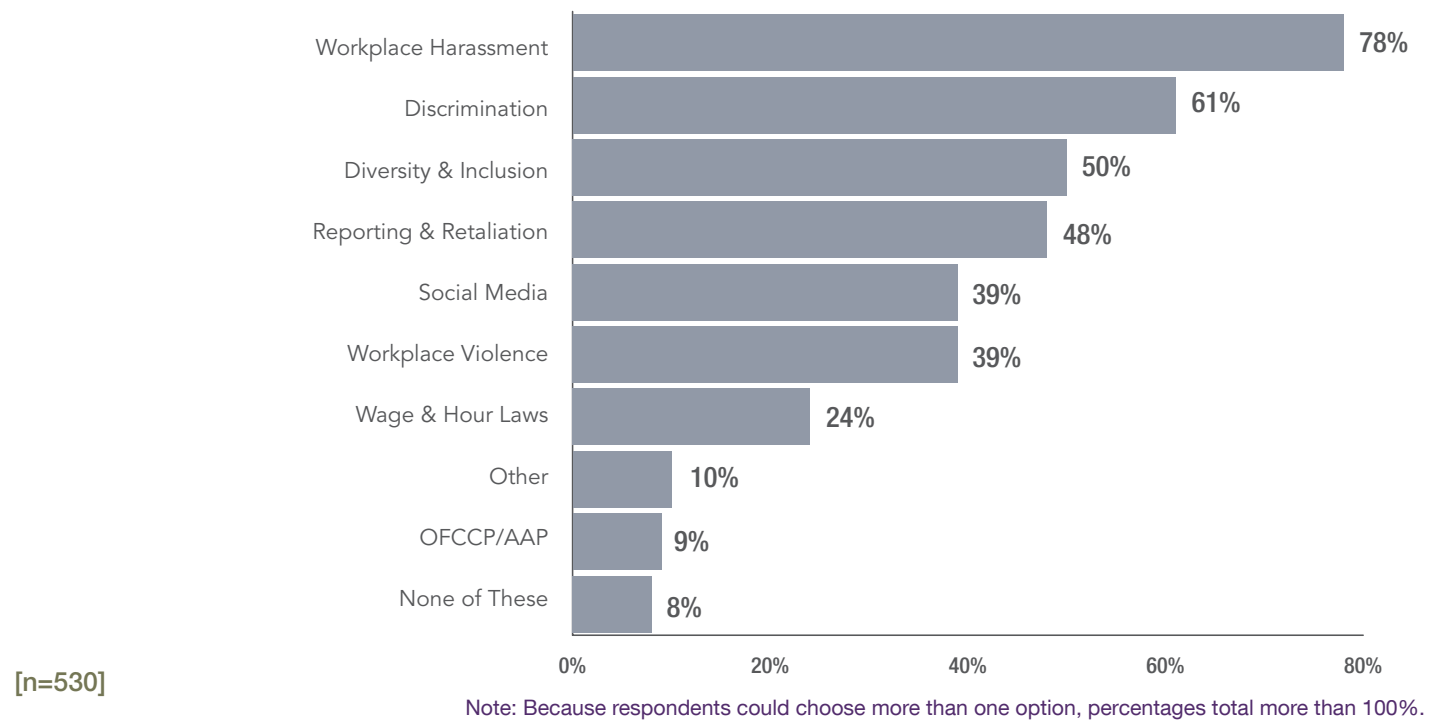
Note: Because respondents could choose more than one option, percentages total more than 100%.

Training Topics (continued)

Which Ethics and Compliance Topics Do You Cover Using Blended Learning? (Top Five)

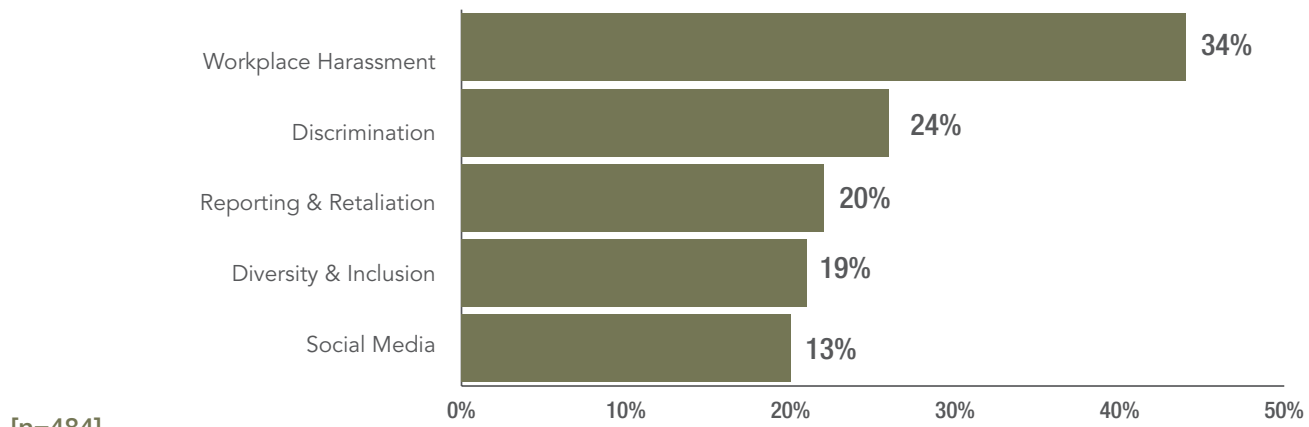


HR/Employment Law Topics: Which of the Following Topics Will Your Organization Train on in the Next Two to Three Years?



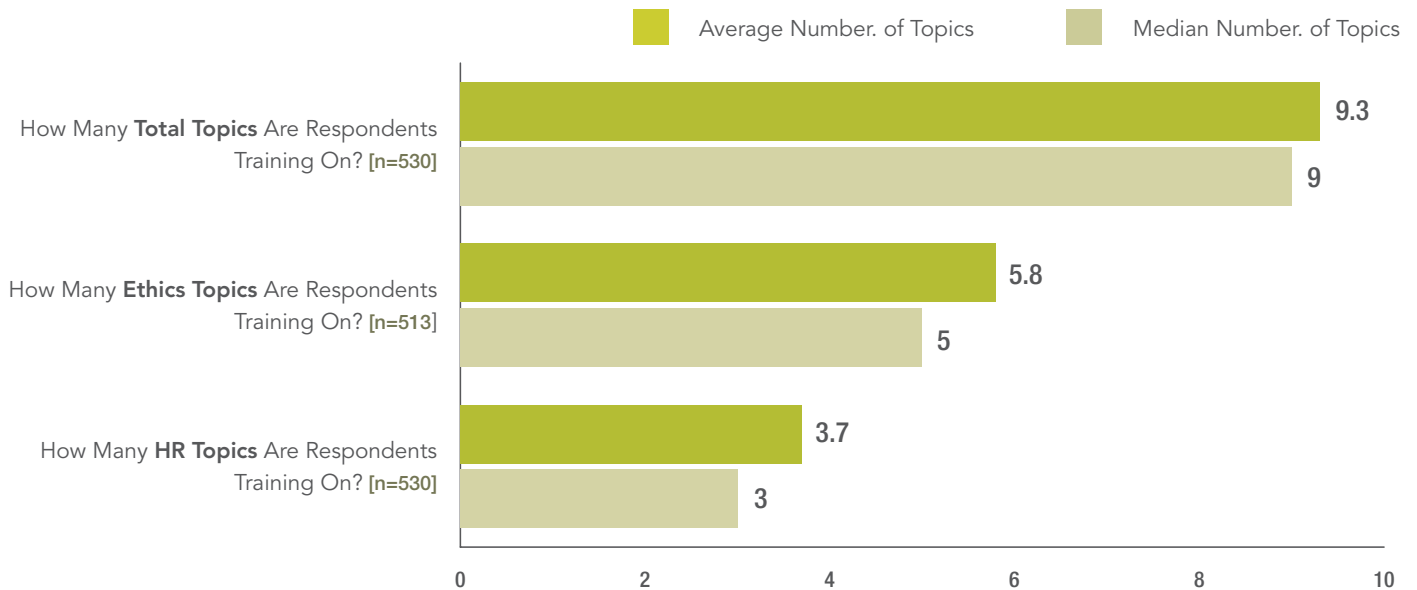
Training Topics (continued)

Which HR/Employment Law Topics Do You Cover Using Blended Learning? (Top Five)



Note: Because respondents could choose more than one option, percentages total more than 100%.

Average Number of Topics Organizations are Training On



ANALYSIS: Both ethics/code of conduct training and workplace harassment training continue to be the workhorses of the ethics and compliance training program and the topics that are deployed on a recurring basis. Organizations that train regularly on these topics need to make sure that they keep content fresh and engaging to capture employee attention and mindshare, and reduce the risk of cynicism.

Training Topics (continued)

While the majority indicated they would be training on ethics/code of conduct, there was still 16 percent that indicated no plans to train on the topic, and an astonishingly large 22 percent that indicated no plans to train on workplace harassment.

Both courses should—at a minimum—be trained on at least once during a two to three year cycle (and for some organizations the training should be more frequent). These courses set the tone for a strong organizational culture and help lay the foundation for compliant and respectful behavior. Training on both titles is also critical to establish key legal defenses for most organizations.

The most significant change over last year's findings is the rise in diversity training. In 2014 only 37 percent of organizations planned to conduct training on this topic during the specified period. In 2015 the number has jumped to 50 percent. Some possible drivers for the increase may include the increased scrutiny of diversity practices over the past year (with the significant media coverage relating to racial tension, gender identity and marriage equality) and employers recognizing that respect for differences is a core element of a strong ethical culture.

Two topic areas remain surprisingly absent from most training programs:

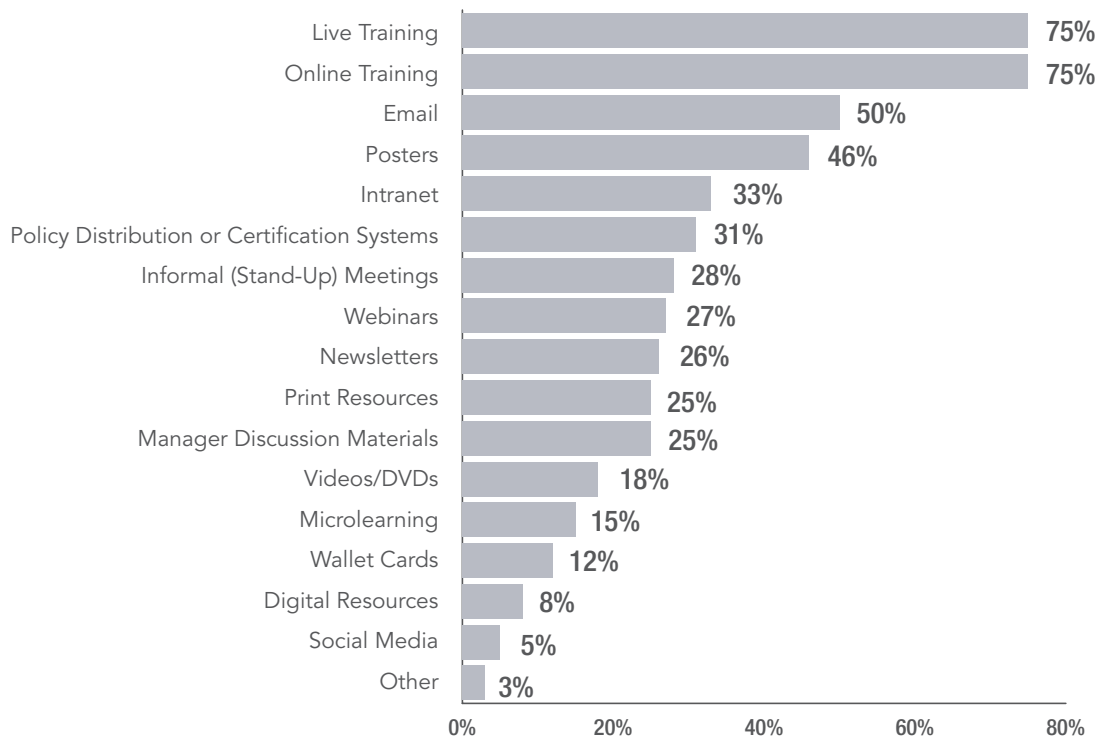
- Cybersecurity has received significant media and regulatory attention over the past year, and is a key focus/concern for senior leaders and boards of directors. Despite the fact that this is an issue that should concern organizations of all sizes and in all industries, and that training all employees can dramatically change an organization's risk profile, only 38 percent of organizations plan to train on this topic. This may be in part to the mistaken belief that cybersecurity is an IT issue, and few compliance professionals have stepped in to help cover this pressing risk area.
- Only 41 percent of respondents indicated their intent to train on bribery and corruption in the coming two to three years, and only 25 percent of respondents indicated their intent to train on third party compliance. Bribery and corruption, and specifically the use of third parties, present a major risk for any organization doing business globally. Organizations that have conducted high-quality training have received favorable results in enforcement proceedings and the DOJ and SEC have made it clear that they expect organizations to train their employees on this risk area.

The low numbers for both of these training topics suggest that many programs may be slow to adapt emerging risk areas.

7. Training and Awareness Formats

FINDINGS: Live training and online training are the most common formats for ethics and compliance training. Seventy-five percent of respondents report that their organizations use at least one of these methods for such training. In addition, 50 percent use emails and 46 percent use posters. Large companies are significantly more likely than medium and small companies to use online training. On average organizations used five different formats for training and awareness, down from six in 2014. Just over half of respondents indicated that blended learning (both live and online training on the same topic) works best in their organization, followed by live training only (30 percent) and online training only (18 percent).

Which of the Following Communication Formats Do You Use for Ethics and Compliance Training and Awareness?

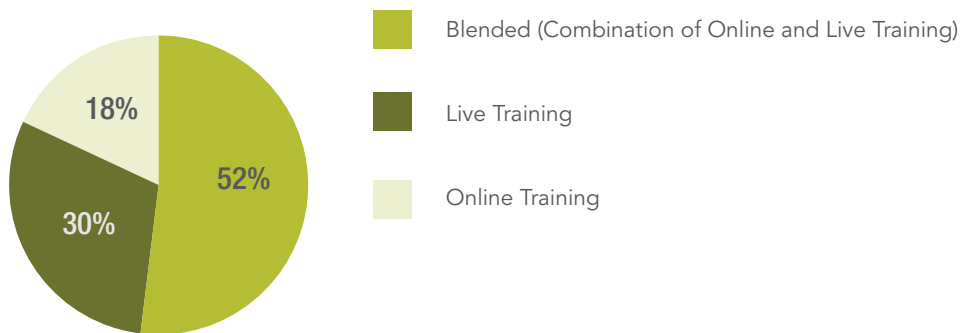


Note: Because respondents could choose more than one option, percentages total more than 100%.

On average, organizations use **5 different formats** for training and awareness.

Training and Awareness Formats (continued)

Which of the Following Training Approaches Works Best in Your Organization?



[n=420]

ANALYSIS: Live training, online training and email remained the top three formats respondents are using in their programs. In the 2014 report, online training topped the list at 71 percent, with live training at 68 percent. This year, our findings indicate that there is a greater balance of use between the top two methods. These numbers suggest that ethics and compliance professionals are more aggressively utilizing technology in a variety of formats to keep employees informed.

By far the largest change from year to year was the reduction in use of print resources such as handbooks, brochures, documents and memos. In 2014, 47 percent of respondents indicated they were using print resource, and only 25 percent of respondents this year indicated they use those kinds of materials—a 22 percent decrease. This signals an increasing reliance on digital formats, and is a good trend to see, as making information readily available (and hopefully in easy-to-access and digest formats) will help improve application and drive greater compliance with policies and expectations.

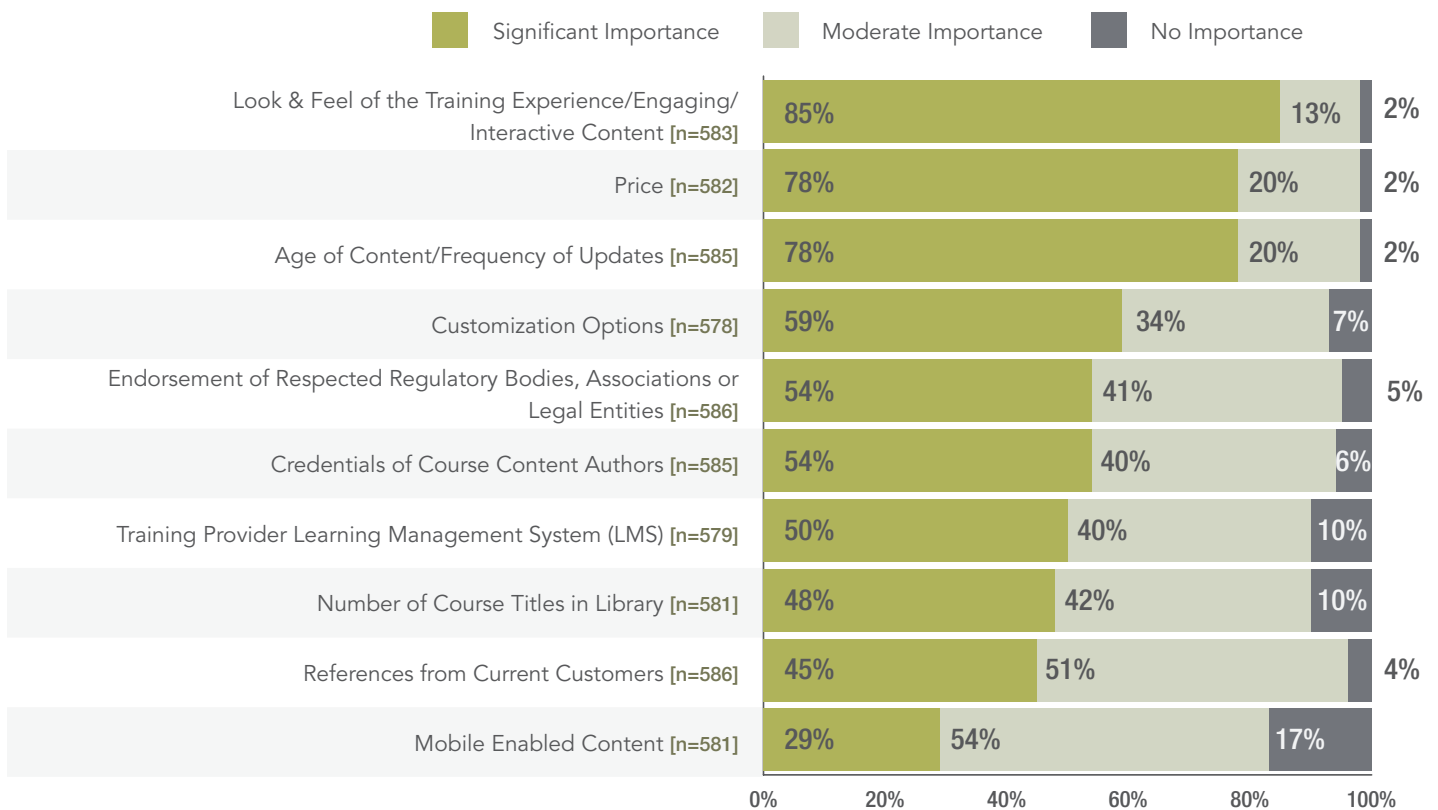
When asked about the top two training methods (live and in-person) and which worked best in their organizations, more than half (52 percent) of respondents indicated that blended learning was best. Blended learning (delivering both online and live training on the same topic) can be very effective in helping provide additional information after an online course has been deployed, or to address issues in a specific regional or geographic area that's not addressed in other training formats.

Overall, a training program strategy that uses a wide variety of formats to reach learners is most effective for meeting different learning styles, and ensuring that the program is fresh and engaging.

8. Training Selection Considerations

FINDINGS: When selecting an online training provider, 85 percent of respondents said look and feel of course content was of significant importance, with price and age of content/frequency of updates tying for second at 78 percent each. The biggest change from 2014's findings was a drop in customization options as a selection criterion (from 80 percent in 2014 findings to 59 percent this year).

When Evaluating eLearning Providers, How Important Are the Following Selection Criteria?



ANALYSIS: As organizations seek to improve the effectiveness of their ethics and compliance training programs, it is vital to carefully consider what factors are driving product selection decisions. Cheap, low-quality training does not build a strong culture, or protect an organization from legal risk.

A risk-aligned—and training program goal-aligned—approach to selection of online training materials helps organizations use budgets wisely while maintaining a program that meets objectives. Where budget constraints exist, organizations should strive to deploy the highest-quality courses for titles that represent the greatest risk and for those that are deployed to all learners (such as workplace harassment and ethics/code of conduct).

Training Selection Considerations (continued)

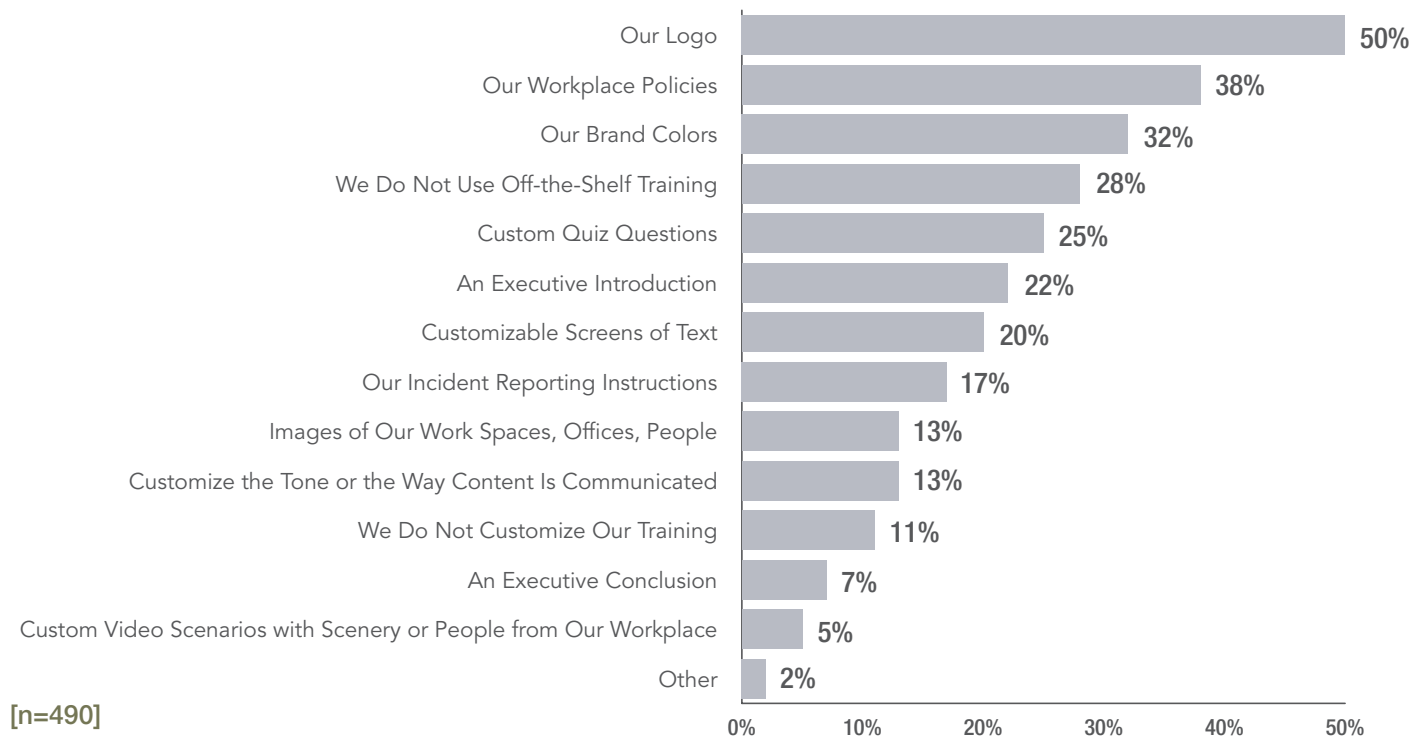
This year's findings also showed two significant moves in selection criteria:

- Respondents are far less focused on customization options this year than they were in 2014 (80 percent of respondents in 2014 said it was of significant importance versus 59 percent in 2015, a decrease of 21 percent). As our customization-specific survey question (see the next section) indicates, organizations may have caught up with the reality that training customizations are generally rather basic—and complex customizations are implemented much less often than may have been anticipated.
- Total number of courses in the library also decreased as a selection criteria (60 percent of respondents in 2014 said it was of significant importance versus 48 percent in 2015, a decrease of 12 percent). Respondents recognize that they have limited seat time which impacts what they can actually deploy in a given training year. In this equation, quality matters more than quantity, and employers benefit more when training dollars are spent on high-quality courses rather than large libraries of stale or outdated content.

9. Customization Preferences

FINDINGS: Of those respondents who use off-the-shelf training, the most frequent customizations are also the most basic: adding logos, workplace policies and brand colors. Eleven percent of respondents noted that they do not customize their off-the-shelf training at all.

Which Customizations Do You Apply to “Off-the-Shelf” Training?



Note: Because respondents could choose more than one option, percentages total more than 100%.

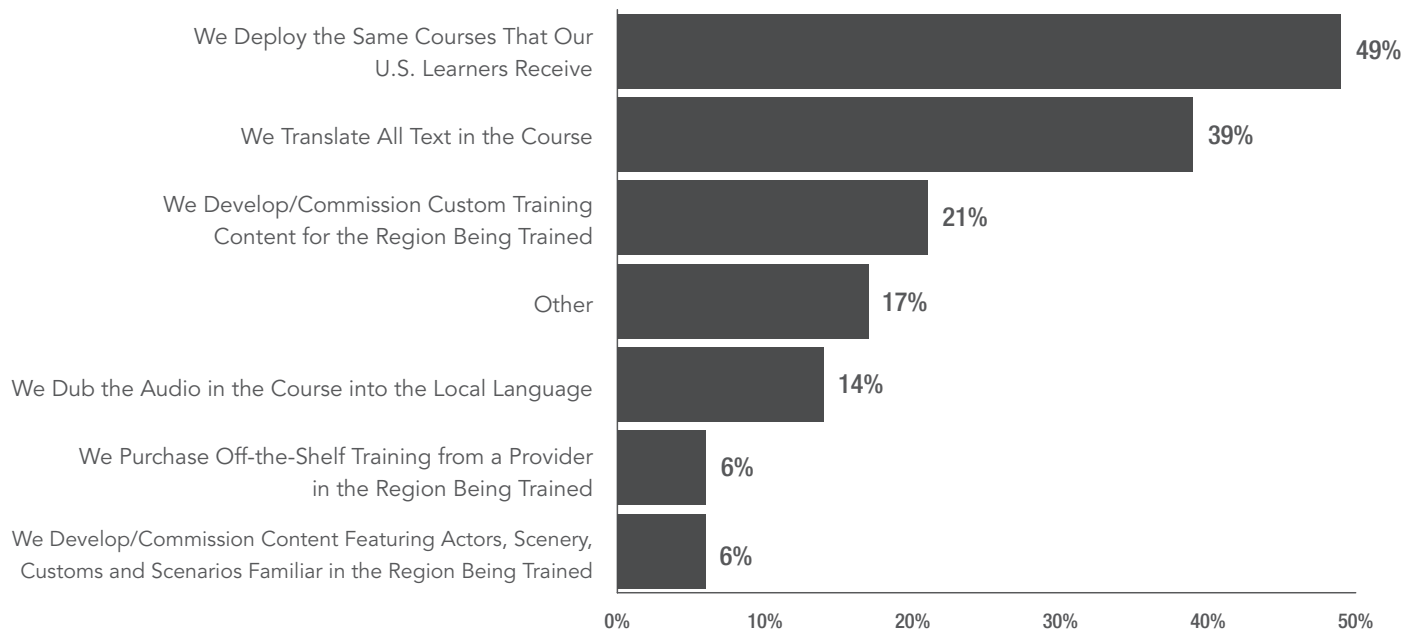
ANALYSIS: While some level of course customization can help improve credibility with learners, most organizations find that basic customizations are sufficient for their program needs. In other words, including a picture of your office, your corporate colors and your logo may make content appear to be more relevant, but it will not be meaningful to learners if the content is subpar and fails to engage.

Some of the more complex customizations—shooting custom video or changing the text on screen—are costly and may not be the best use of limited training program funds. Instead, if extreme customization is needed, organizations might weigh the cost of other options, such as live training, blended learning, developing their own course in-house, or having a partner develop a custom training course for them from the ground up.

10. Training Non-U.S. Learners

FINDINGS: The most popular approaches used by respondents that train employees globally include deploying the same courses to all learners regardless of geography (49 percent) and translating all text in the course (39 percent). One in five organizations indicate that they develop or commission custom training for the region where training occurs, and 14 percent dub audio in the native language of the learners. Highly specialized and often more costly options are used less frequently.

Which Statements Best Describe Your Training Approach for Non-U.S. Learners?



[n=210]

Note: Because respondents could choose more than one option, percentages total more than 100%.

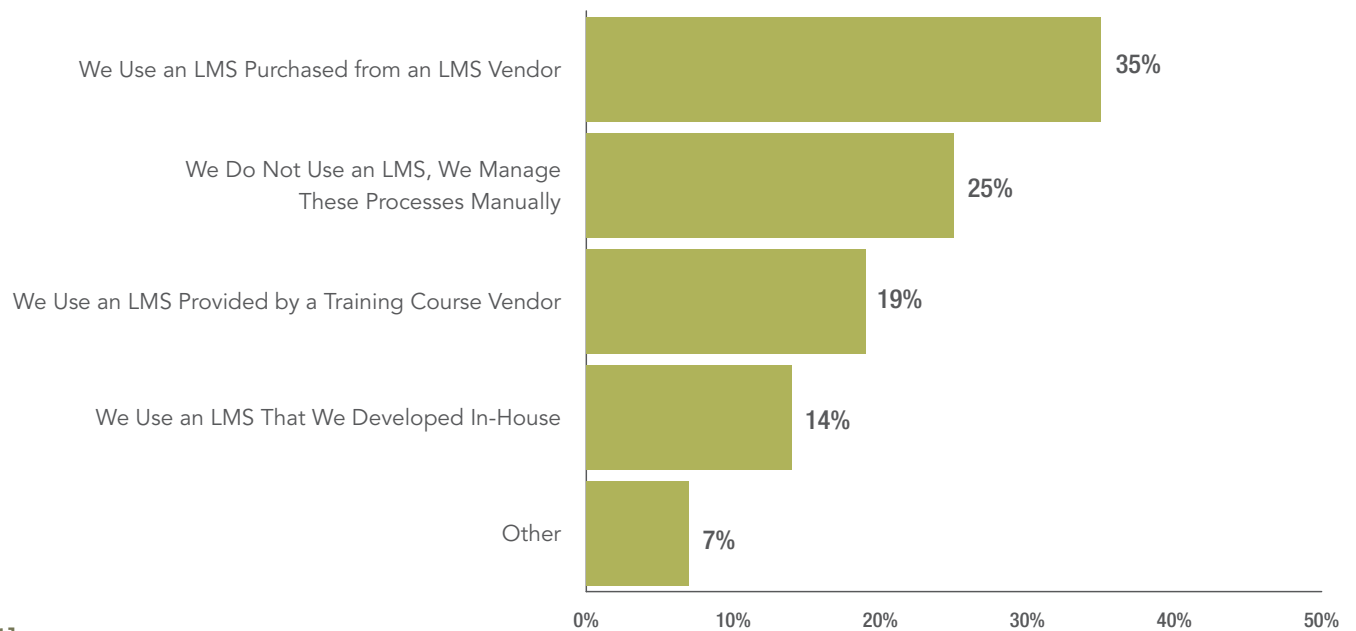
ANALYSIS: Evidenced by the SEC’s \$30 million whistleblower award last year to an individual based outside of the U.S., there are no geographic boundaries when it comes to risk, which means that training all employees globally is important. But training a global audience often presents real challenges for ethics and compliance professionals. Cultural, language and technology barriers, as well as the sheer complexity of fractured budgets and decision-makers can make for a herculean project. When rolling out a global program, greater balancing of objectives may be warranted—and some trade-offs may be required to ensure deployment of training. However it is essential that all learners have equal access to the same information.

The data shows that highly specialized and often more costly training options are used less frequently. One in five organizations indicate that they develop or commission custom training for the region where training occurs, and 14 percent dub audio in the native language of the learners. Both practices can help improve how training is received, but often must be balanced against significant budgetary and time constraints that often make these options prohibitive unless they are planned for well in advance and budgeted for appropriately.

11. Learning Management Systems

FINDINGS: Sixty-eight percent of respondents reported that their organization uses a learning management system (LMS) to deploy and track training, while 25 percent say they handle their training deployment and tracking processes manually. When the data is broken down by organization size, the findings reveal that 41 percent of small businesses and 26 percent of medium businesses are still managing processes manually.

Which of the Following Best Describes the Learning Management System You Use to Deploy and Track Training?

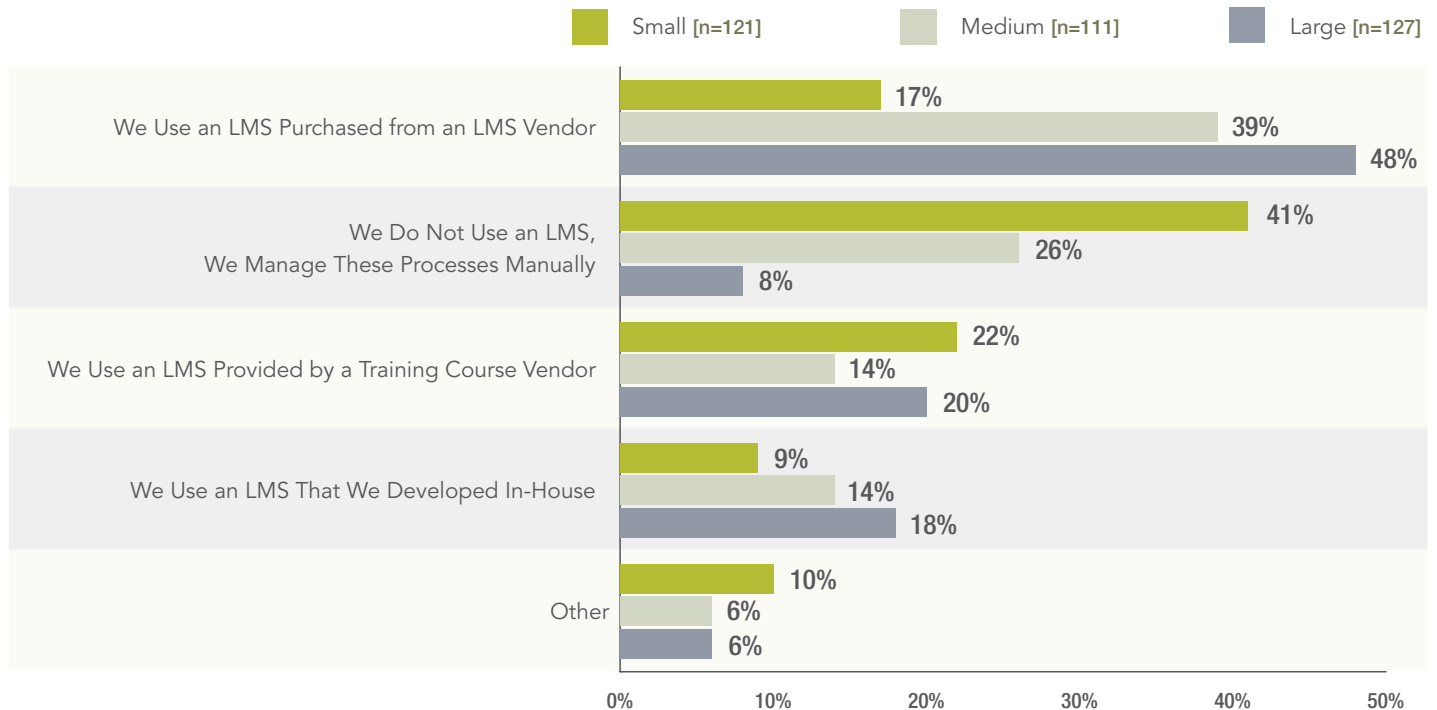


IV. KEY FINDINGS

Benchmarking Ethics & Compliance Training

Learning Management Systems (continued)

By Organization Size: Which of the Following Best Describes the Learning Management System You Use to Deploy and Track Training?

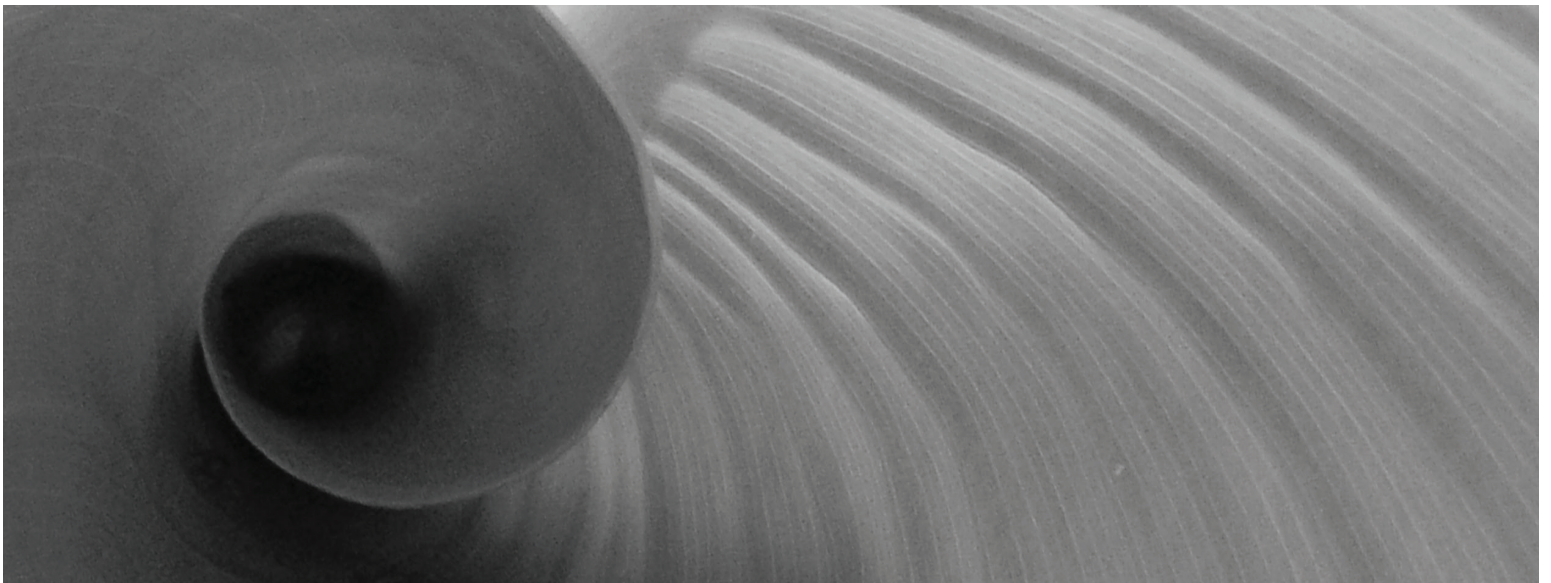


ANALYSIS: Utilization of an LMS to assist with training deployment and tracking is a best practice that improves numerous elements of an ethics and compliance training program (deployment, follow-up, course assignment, completion tracking and establishing audit trails). Surprisingly though, 41 percent of small organizations, 26 percent of medium organizations and eight percent of large organizations are still using manual approaches.

Regardless of organization size, manual processes for managing training activities are rife with problems. LMS technology helps organizations increase efficiency, improve accuracy and create reliable audit trails for compliance purposes. Organizations that use manual processes should complete an ROI analysis of the cost of their manual processes and determine whether an automated process will save them time and money while better protecting them in case of an audit or legal action.



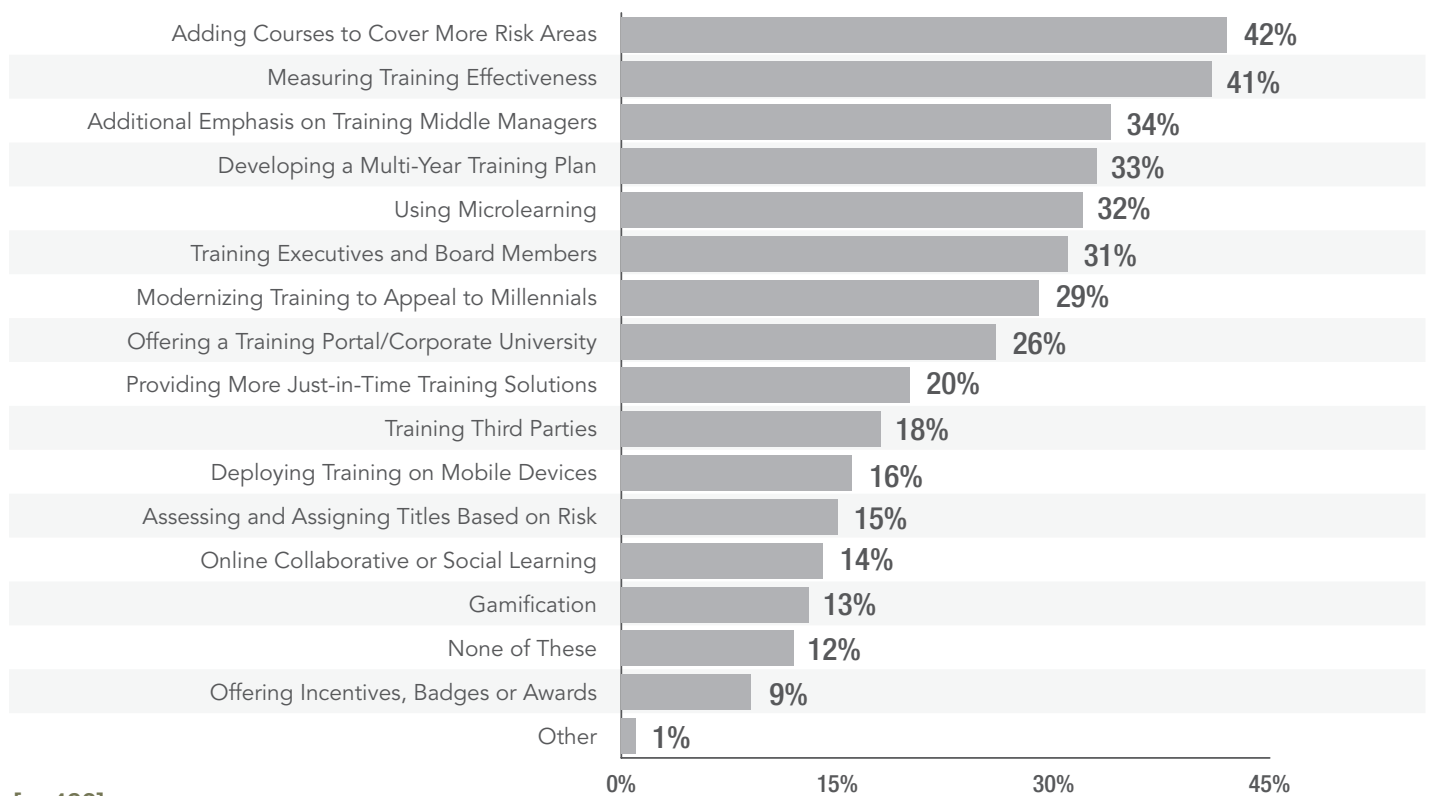
THE FUTURE OF ETHICS & COMPLIANCE TRAINING



1. Overall Training Trends

FINDINGS: The top three trends—adding courses, measuring effectiveness and increasing focus on middle managers—remained the same from our 2014 findings. We also added several new options for respondents to choose from in 2015, the most popular of which was modernizing compliance learning to appeal to millennials. Nearly one-third of respondents indicated they are planning to update their programs to ensure engagement with this rapidly growing segment of the workforce.

Which of the Following Training Trends Are You Currently Applying or Will You Apply in the Next Year?



Note: Because respondents could choose more than one option, percentages total more than 100%.

ANALYSIS: This year's largest mover was, "developing a multi-year training plan" (referred to in the 2014 report as "curriculum mapping"). Last year, 16 percent of organizations said they had already or would be developing such a plan, and this year, 33 percent of respondents said they have or will develop such a plan. Hopefully this significant increase indicates that compliance officers will incorporate a greater focus on properly identifying training topics and audiences, more rigor around budget needs, developing a training cadence, assessing effectiveness and making year-over-year improvements based on data.

Overall Training Trends (continued)

We added several new trends to the list this year. Those that represented a significant focus for respondents were:

- Modernizing training programs to appeal to millennials (29 percent—see the next section of this report for additional details on this trend)
- Offering a training portal like a corporate university (26 percent)
- Providing just-in-time training (26 percent)

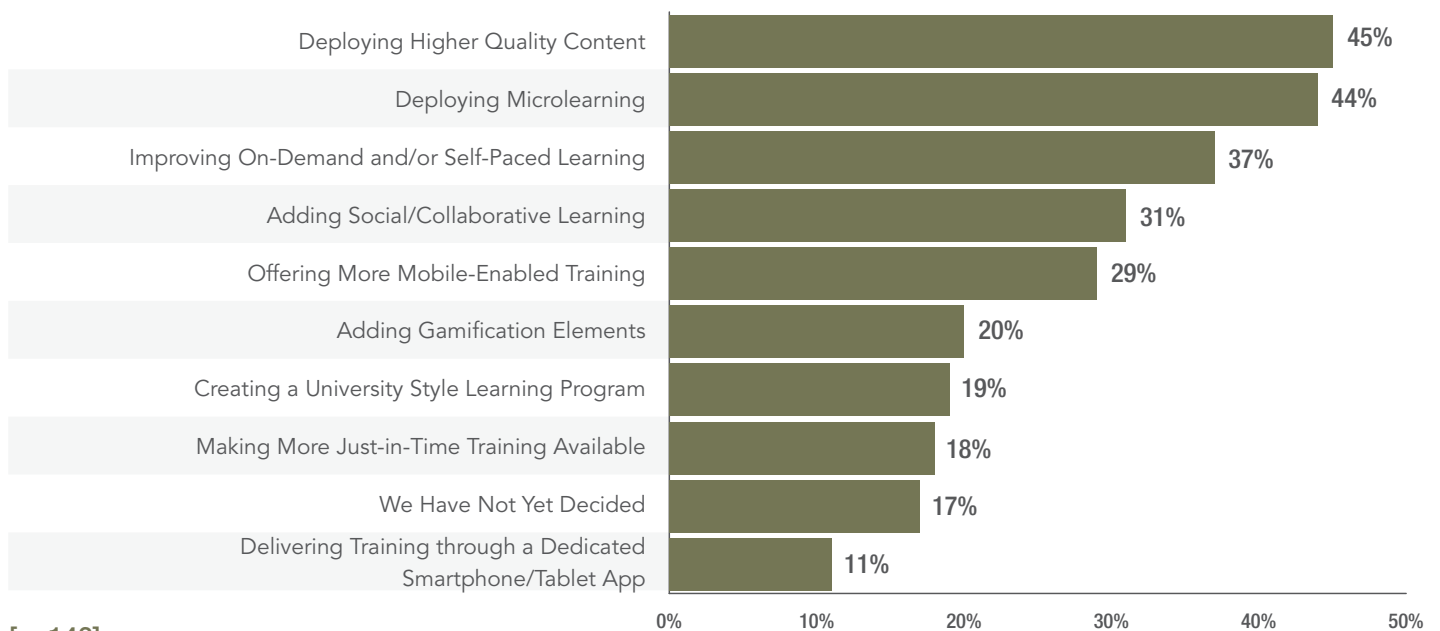
Each of these new trends indicates a movement toward providing learners with greater flexibility in how and when they access content.

Another new trend that should gain popularity over the next several years is improving the process for assessing and assigning training courses based on risk (at 15 percent in 2015). The ability to achieve this level of program maturity is a ways off for most organizations, but it should represent an important multi-year goal.

2. Adapting Training Programs to Engage Millennials

FINDINGS: Respondents indicated that they will be adapting their programs to engage millennials by deploying higher-quality content (45 percent), deploying microlearning (44 percent) and improving on-demand and self-paced learning options (37 percent).

In Which of the Following Ways Are You Modifying Your Ethics and Compliance Training Program to Better Accommodate the Needs of Millennials?



Note: Because respondents could choose more than one option, percentages total more than 100%.

ANALYSIS: In an effort to modernize training programs, one in three organizations are contemplating new ways to engage and teach employees about important ethics and compliance topics. And although the workforce shift that is currently occurring (millennials representing 75 percent of the workforce by 2025) is driving many compliance professionals to make changes, the changes should not be targeted to or limited to employees in the millennial generation. All employees across all demographics can exhibit similar learning preferences and will benefit from and appreciate improved program elements.

Millennials (and workers of any age who share a millennial mindset) have been noted by many researchers as being very media savvy, always connected, placing a high value on social and collaborative experiences and accustomed to accessing information on-demand (with little or no patience for waiting). We are pleased to see that the top adaptations respondents indicated they will be making address each of these key characteristics and resulting impact on learning styles. We also believe that these program changes will benefit all learners.

Adapting Training Programs to Engage Millennials (continued)

Employees are bombarded by increasingly high quality media throughout their work day. Whether they are on social sites, media outlets, blogs, or watching informational videos the competition for mindshare is fierce. Training has to be able to compete with the modern media experience to avoid the appearance of being dated or irrelevant.

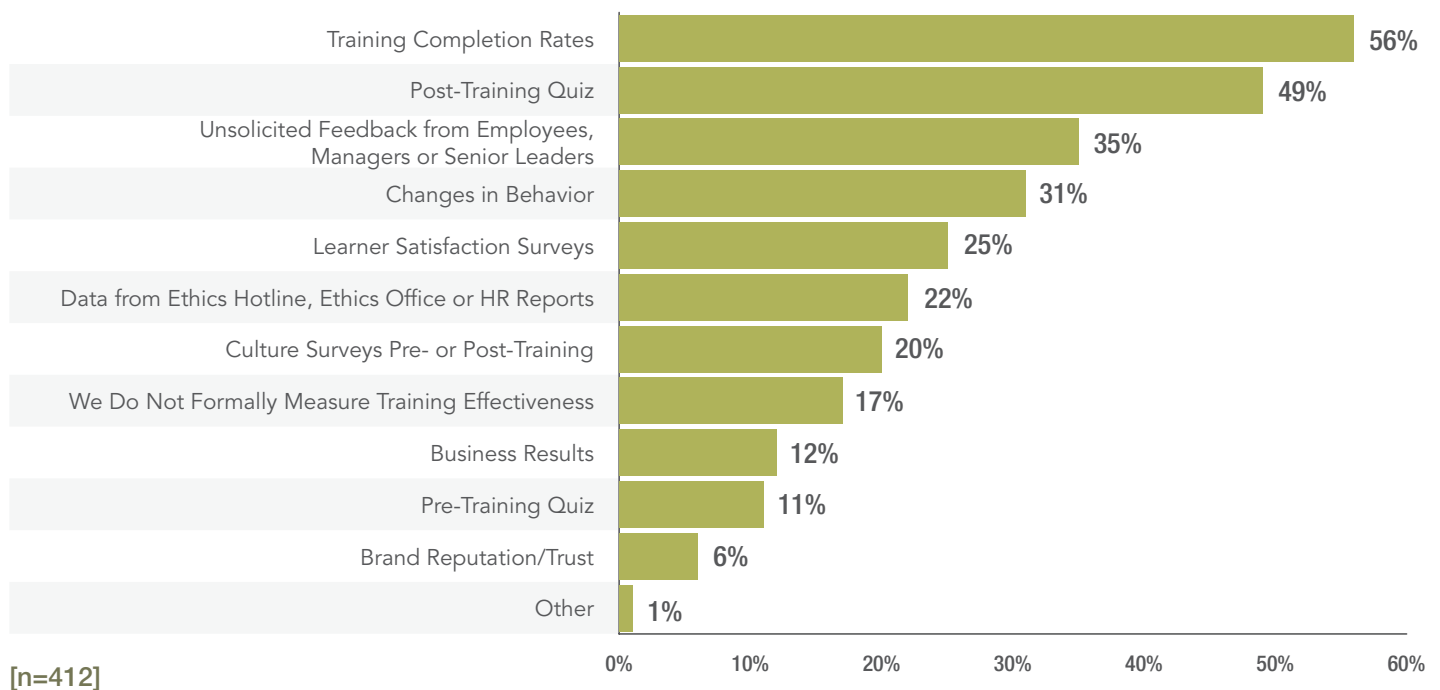
Another strong trend is adding gamification elements to training. While overall only one in ten respondents indicated that they are focused on this trend, those who are focusing on millennials tend to focus on this trend at higher rates (20 percent). In coming years gamification will likely become much more mainstream and more organizations will begin to utilize this learning format.

Overall, it is important to stay on top of adult learning trends, and ensure that your training program incorporates multiple methods and learning styles.

3. Measuring Program Effectiveness

FINDINGS: The top five approaches to measuring effectiveness remained the same from our 2014 findings. There was a small decrease year over year in the number of respondents who indicated that they do not use training effectiveness metrics (20 percent in 2014 versus 17 percent in 2015). This year, we also looked at the data by company size, and found that large companies are more likely to use training completion rates as a key effectiveness measure (72 percent) than medium (54 percent) and small (44 percent) organizations.

How Do You Measure Training Effectiveness?



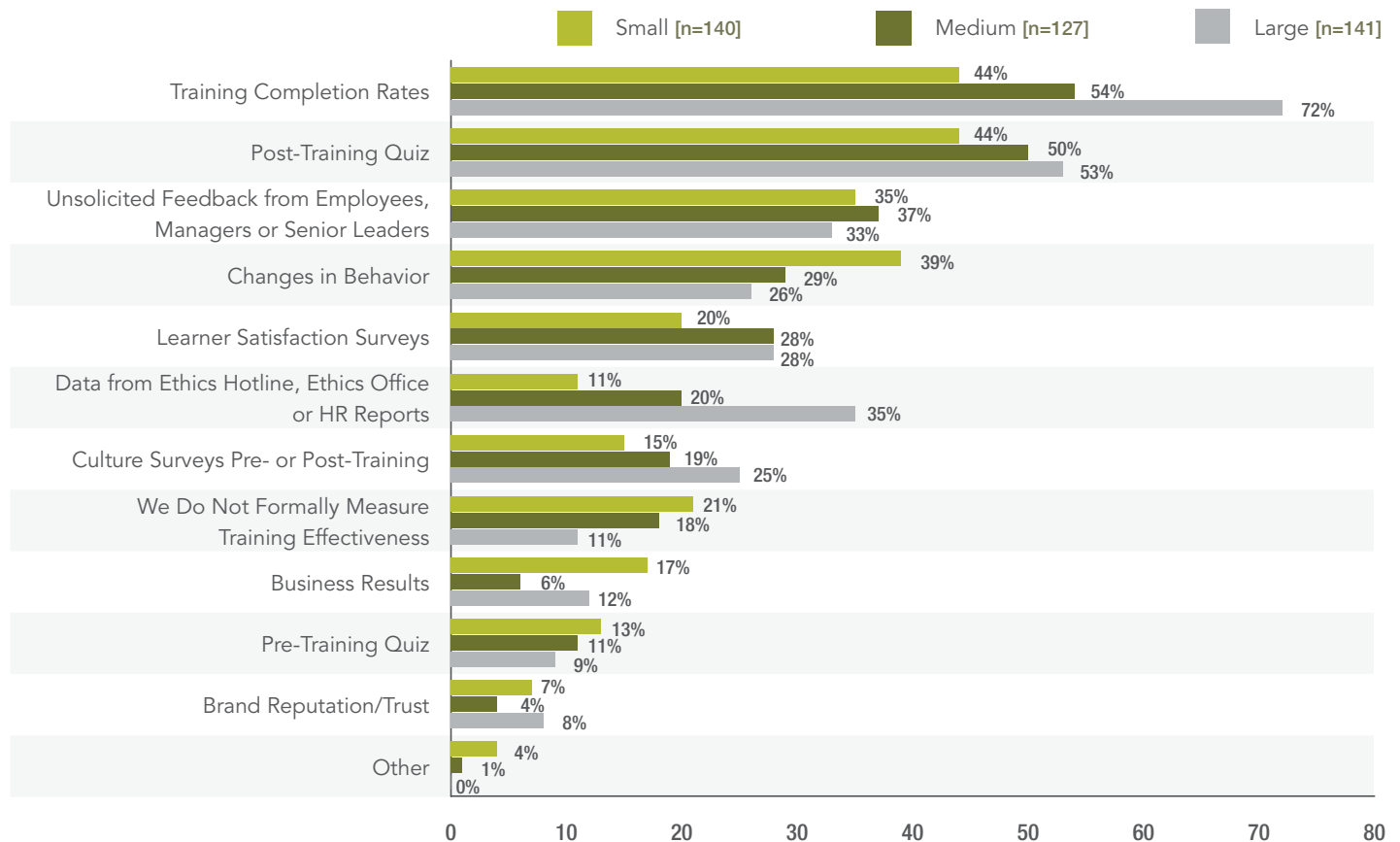
Note: Because respondents could choose more than one option, percentages total more than 100%.

IV. KEY FINDINGS

The Future of Ethics & Compliance Training

Measuring Program Effectiveness (continued)

By Organization Size: How Do You Measure Training Effectiveness?



ANALYSIS: Measuring training effectiveness is a persistent challenge for organizations responding to this survey. More organizations report that they are trying to measure effectiveness as compared to last year (in 2015, 83 percent of respondents are looking at one or more metrics, while in 2014 only 80 percent were). But despite the importance of the process, 17 percent of respondents indicate their organizations do not formally measure effectiveness.

To truly demonstrate the ROI of a training program—and advocate for the resources they need to make it even more effective, compliance professionals must carefully consider the metrics they use. This exercise should be done in conjunction with senior leaders, and align to organizational values, goals and risks.

While it is not feasible to adopt every possible metric for measuring effectiveness, organizations need to budget and plan for collecting and analyzing their data. In the future, we'd hope to see organizations using more powerful and meaningful metrics, such as:

- Pre-training quizzes (currently used by 11 percent of respondents)
- Post-training quizzes (currently used by 49 percent of respondents)
- Satisfaction surveys (currently used by 25 percent of respondents)
- Changes in behaviors (currently used by 31 percent of respondents)

Conclusion

To get the resources they need to create a high-quality, effective training program, compliance professionals need to be their own advocates. This includes making the case for training with senior leaders, presenting a multi-year training plan that aligns with organizational risk and supports organizational goals, as well as demonstrating the business value of the successful execution of the program plan. It also requires showing the costs and consequences of low-quality training programs—or failing to train—including the risk of sanctions, fines, penalties, attorney fees, reputational damage, lost revenue, lost profits, employee turnover, lost productivity and low morale to name a few.

To achieve a true culture shift, compliance professionals must ensure that their program does not simply “check the boxes.” Employees can tell the difference between perfunctory training programs and those that are making a genuine attempt to create a culture of ethics and respect. The ideal—and effective—compliance training program makes a real difference in corporate culture, changing the way business gets done, and creating bottom-line value.

Key Takeaways

- **Pinpoint Culture Challenges to Avoid Undermining Training Effectiveness and Goals:** Culture challenges can sabotage training effectiveness and prevent you from reaching your training goals. Employee cynicism, fear of retaliation, managers that aren't creating a healthy tone in the middle, senior leaders and boards that are not engaged: each of these issues have a significant impact on culture and can derail a training program. Find potential cultural weaknesses through a culture assessment and work to effectively address each one to make training more effective.
- **Elevate Program Rigor, Formality and Measurement to Demonstrate Program Value:** Despite their importance in achieving compliance objectives (culture and risk reduction), training programs are challenged by insufficient budget or no budget allocation at all, fractured budget ownership, a focus on price over effectiveness in selection of training solutions, a lack of formal effectiveness measurements and failure to establish multi-year training plans (curriculum maps) to show year-over-year program improvements. Organizations must solve for these challenges and recognize that high-quality compliance training is not a big spend with little or no ROI, but rather an investment in an organization and its people. (See our [“By the Numbers: Making the Business Case for Employee Compliance Training”](#) whitepaper for more on the business value of training programs.)
- **Ensure Legal Defensibility is a Key Buying Criteria for Training:** With 50 percent of respondents indicating they have used training in a legal defense, organizations without robust ethics and compliance training programs are rolling the dice when it comes to protecting themselves. As such, compliance professionals must consider as a critical part of their buying criteria how the training will be received not only by employees, but by judges, jurors and enforcement officials. More organizations should consider incorporating legal review into the process of building or buying training solutions.

V. CONCLUSION AND KEY TAKEAWAYS

Key Takeaways (continued)

- **Make Up Lost Ground on Senior Leader and Board of Director Training Times:** Make a case for the importance of training your top executives. It can be very challenging to secure seat time for these higher level learners, but compliance professionals must continue efforts to make training easily accessible and high-quality to engage and impact behavior at this level. High-quality training courses, short bursts of peer-to-peer learning (such as the videos offered in our NAVEX Exchange series) and live, scenario-based training (offered by our Advisory Services team) have proven, in our experience to have the greatest impact for these groups. Their commitment—or lack of commitment—to the success of an ethics and compliance program can make or break the culture of an organization.
- **Make Sure Training Courses Match Evolving Organizational Risks:** Organizations need to create multi-year training plans, but those plans (and training budgets) need to be aligned with an organization's risks and revisited and adjusted regularly to accommodate emerging risks. If your organization has not recently conducted an ethics and compliance-specific risk assessment, advocate that they do, and provide input into the process if you can. By getting involved in a risk assessment up front—or using your existing risk assessment to guide the development of your training program—you can increase training program credibility and value with leadership.
- **Advocate for Dedicated Budget and Program Resources:** Your training program should be assigned a budget, staff time and accountability for program success. Creating a dedicated budget with ownership by a single department can help organizations begin to shift their thinking about training as a necessary cost of doing business that protects them from risk, rather than a line-item they have to find a way to cover.
- **Adjust Programs for an Evolving Workforce:** It is essential that ethics and compliance professionals adapt their training programs to engage millennials who will soon represent a significant portion of the workforce. But changes won't just benefit millennials; all learners should find value in the use of higher-quality content and easier access to ethics and compliance resources.

VI. ETHICS AND COMPLIANCE TRAINING RESOURCES

NAVEX Global's Training Solutions

NAVEX Global's training solutions help your organization prevent misconduct, build powerful legal defenses and create a culture of ethics and respect. We offer:

- Online training courses featuring current, high quality content that is relevant, globally oriented, legally vetted and engaging.
- Learning management technology and flexible course delivery options to meet the training, certification, reporting and management demands of organizations of any size or complexity.
- In-person training that supplements online training in high risk areas, or to meet the needs of key audiences—including boards of directors and senior executives.
- Risk assessments, culture assessments and multi-year training plans that help organizations ensure their training program is tightly aligned to their organizational risks and objectives.

To learn more about our training solutions or to schedule a demo of any of our online training courses, visit www.navexglobal.com/training or call us at + 1 866 297 0224.

Online Training Tools and Thought Leadership

NAVEX Global offers many valuable resources for improving your training program. Visit our resource center at www.navexglobal.com/resources to find these tools and more:

- **Online Courseware Library:** Browse our full library of training options and topics. www.navexglobal.com/coursewarelibrary
- **Burst Learning User Guide:** Learn how microlearning can enhance your program's effectiveness. www.navexglobal.com/burstlearningguide
- **By The Numbers:** Prove the business value of a strong training program in this business case. www.navexglobal.com/trainingbythenumbers

More Benchmarking Resources From NAVEX Global

Ethics and compliance professionals around the world leverage NAVEX Global's benchmarking reports to help them make better program decisions and increase program effectiveness. Download our other 2015 benchmarking reports today.

- **Hotline Benchmark Report & Toolkit:** Get hotline benchmarking data from the NAVEX Global reporting database—the largest database of its kind in the world. Learn how to measure the hotline report data in your case management system, assess your organizational culture and improve your compliance program effectiveness. www.navexglobal.com/hotlinetoolkit2015
- **Policy Management Benchmark Report:** The most definitive set of industry benchmarks ever compiled for policy management, this benchmark report provides the data and insights you need to boost your policy management program. www.navexglobal.com/policymgmtbenchmark2015

VII. ABOUT THE AUTHOR



Ingrid Fredeen, J.D.

Ingrid Fredeen, J.D., NAVEX Global's Vice President of Online Learning Content, has been specializing in ethics and legal compliance training for more than 10 years. She has been the principal design and content developer for NAVEX Global's online training course initiatives utilizing her more than 15 years of specialization in employment law and legal compliance. Prior to joining NAVEX Global, Ingrid worked both as a litigator with Littler Mendelson, the world's largest employment law firm and as in-house corporate counsel for General Mills, Inc. a premier Fortune 500 food manufacturing company.

VII. ABOUT NAVEX GLOBAL

NAVEX Global helps protect your people, reputation and bottom line through a comprehensive suite of ethics and compliance software, content and services. The trusted global expert for 8,000 clients, our solutions are informed by the largest ethics and compliance community in the world. More information can be found at www.navexglobal.com.



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