2016 Ethics & Compliance Training Benchmark Report

DATA AND INSIGHTS TO GET MORE VALUE FROM YOUR PROGRAM

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INTRODUCTION

In 2016 NAVEX Global partnered with an independent research firm to survey ethics and compliance (E&C) professionals from a wide range of industries about their approach to E&C training.

The findings represent responses from 644 respondents. (See "Survey Respondent Profile" for details.)

This report provides insights and analysis of such questions as:

» What approaches do organizations take when it comes to E&C training?

» What challenges do organizations face when it comes to E&C training?

» How do organizations measure training effectiveness?

» What outcomes or benefits do organizations realize from their E&C training programs, and what influenced them?

» What training activities are priorities for organizations?

How to Use This Report

Most organizations have compliance training programs in place today. In most cases, these programs are pursued to both protect the organization and to help build a culture of ethics and respect. Yet too many programs stagnate and lose effectiveness as learner fatigue grows, content ages and key measurements and strategic targets are missed. The compliance training marketplace demands more current, diverse and compelling training and educational content designed for learners across the organization.

This report will help you:

» Access the information you need to evaluate the quality and effectiveness of your own training program—and whether your program is protecting the organization or putting it at risk

» Gain ideas from your peers for improving your own training program

» Pinpoint areas in which your program may need to grow or evolve

» Benchmark your training program against industry norms and best practices

» Leverage our data and recommendations to improve your program effectiveness

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

What is Ethics and Compliance Training?

For the purposes of this analysis, unless specified, ethics and compliance training includes regulatory compliance, code-of-conduct, employment law and information security training. Topics as diverse as workplace harassment, wage & hour, code of conduct, cyber security, and anti-bribery and corruption all fit within this broad definition. Further, all forms of training on E&C topics, including e-learning, live, email, in-person, virtual, blended and instructor-led training are included in this definition.

TRUST NAVEX GLOBAL'S ETHICS & COMPLIANCE SOLUTIONS

NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organizations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world.
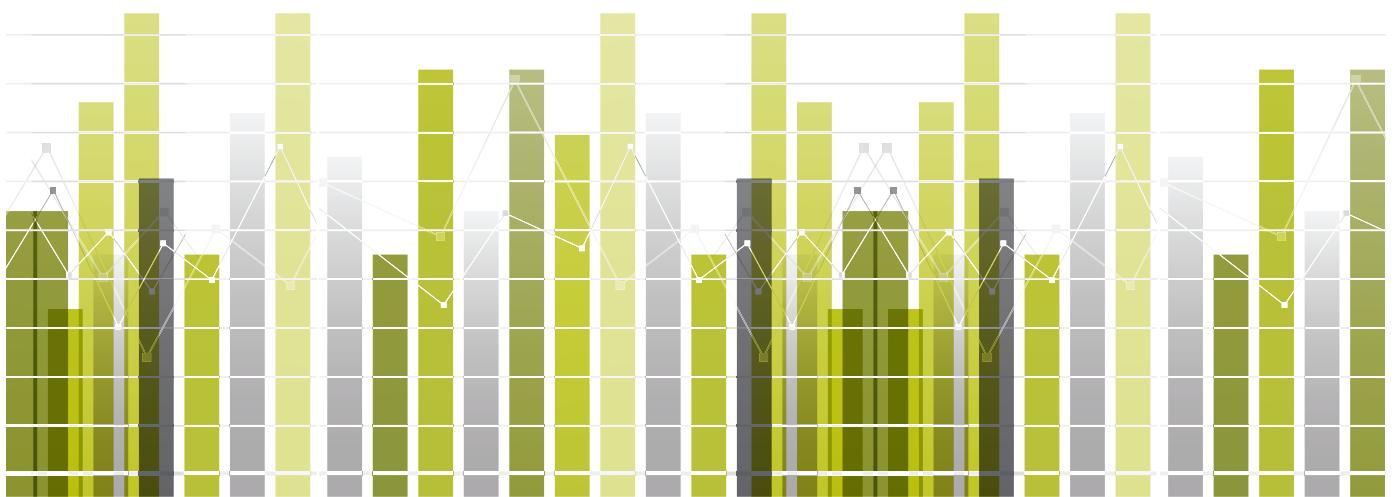
Survey Respondent Profile
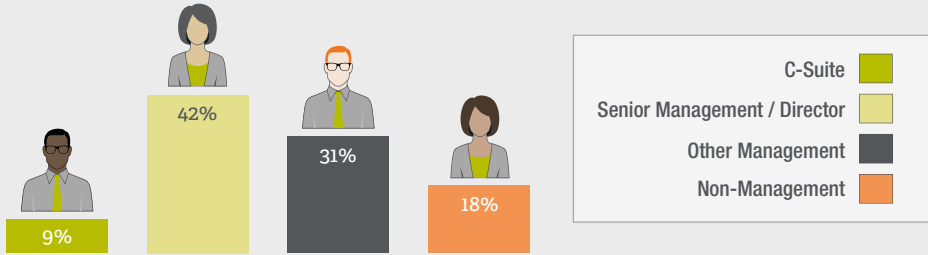
Job Level

9%
42%
31%
18%

- C-Suite
- Senior Management / Director
- Other Management
- Non-Management

Company Employee Size

24% Small (<5,000)

32% Medium (501-5,000)

44% Large (5,000+)

Company Annual Revenue

Less Than $50M — 13%

$50M - $999M — 25%

$1B+ — 41%

Government / Nonprofit — 9%

Don't Know — 12%

Purchasing Role

43%	52%	20%	10%	8%	15%
Decision Maker / Responsible Party	Decision Influencer	Vetter	Validator	Budget Contributor	Other

Industry (Number of Respondents)

Industry	Number of Respondents
Healthcare Providers	98
Manufacturing	79
Business & Professional Services	48
Energy, Utilities, Oil & Gas	43
Banking & Financial Services	41
Insurance	41
Technology	39
Education	32
Not for Profit	28
Pharmaceuticals & Life Sciences	27
Transportation & Warehousing	24
Government	20
Retail	18
Aerospace & Defense	17
Chemicals	17
Healthcare Products	15
Construction	12
Agriculture / Food & Beverage (Not Restaurants)	14
Real Estate	14
Leisure, Recreation, Arts & Entertainment	8
Other	9

Regions in Which Respondents Conduct Ethics & Compliance Training

28% CANADA

89% UNITED STATES

32% LATIN AMERICA

40% EUROPE

18% AFRICA

23% MIDDLE EAST

35% ASIA

23% AUSTRALIA/ NEW ZEALAND/ PACIFIC ISLANDS
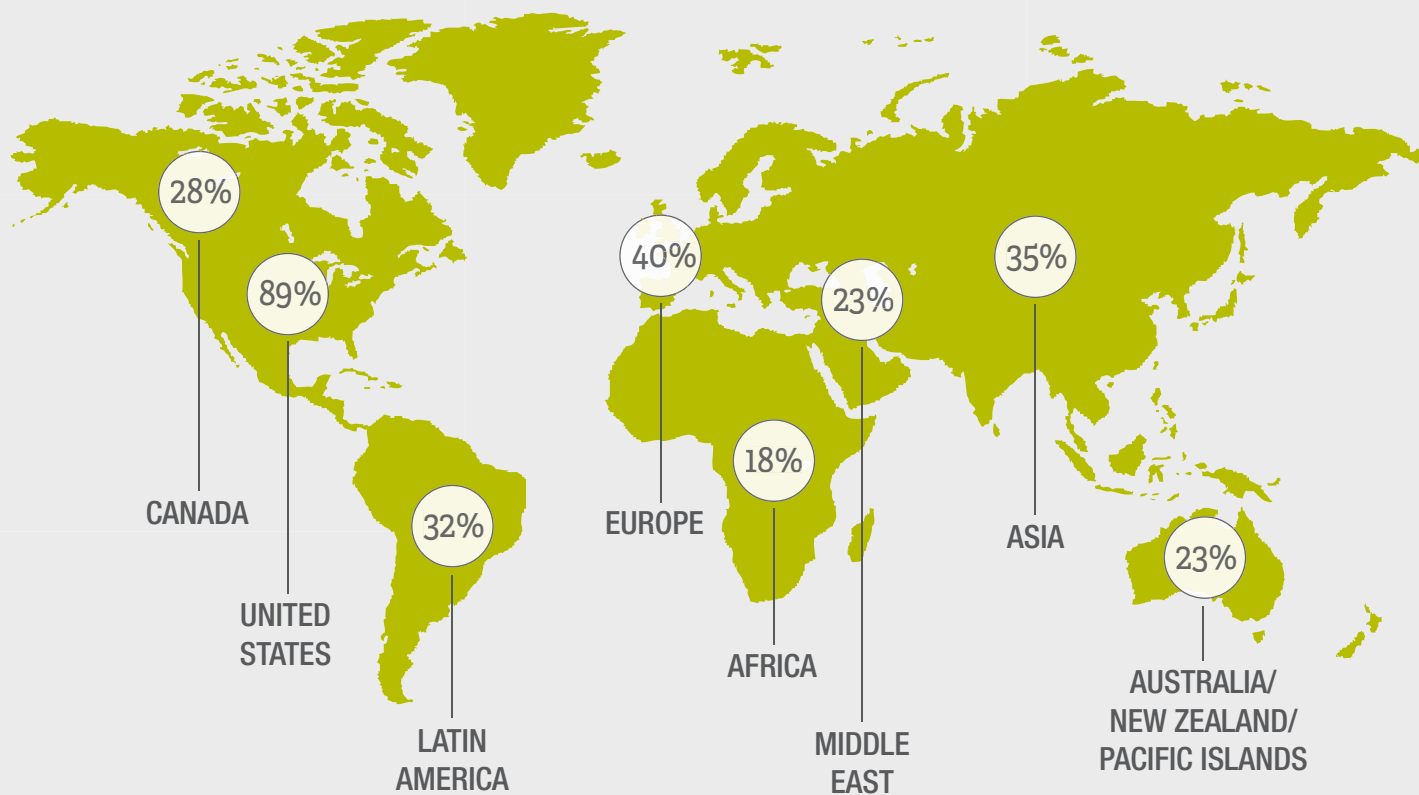
Location of Headquarters

USA	EMEA	APAC	CANADA	LATAM
77%	14%	6%	2%	2%

Job Function

Ethics and Compliance	Human Resources / Employee Relations	Legal	Internal Audit / Quality Control	Risk Management	Other
51%	20%	14%	4%	3%	8%
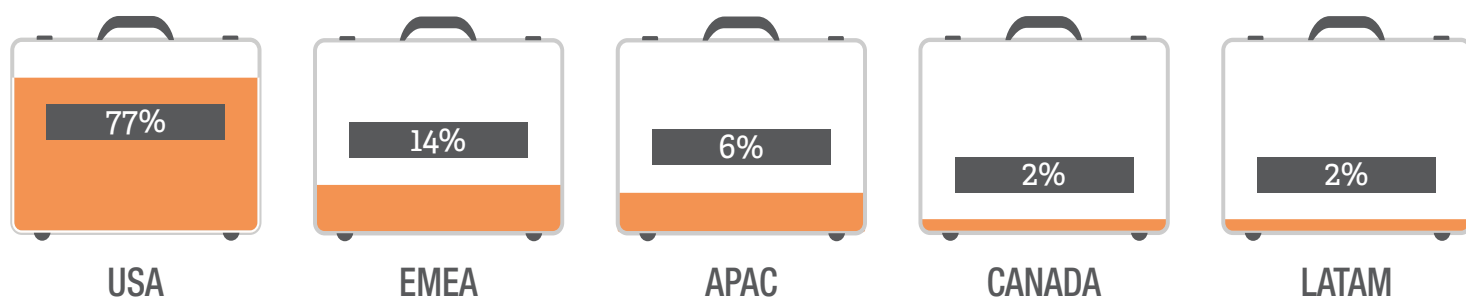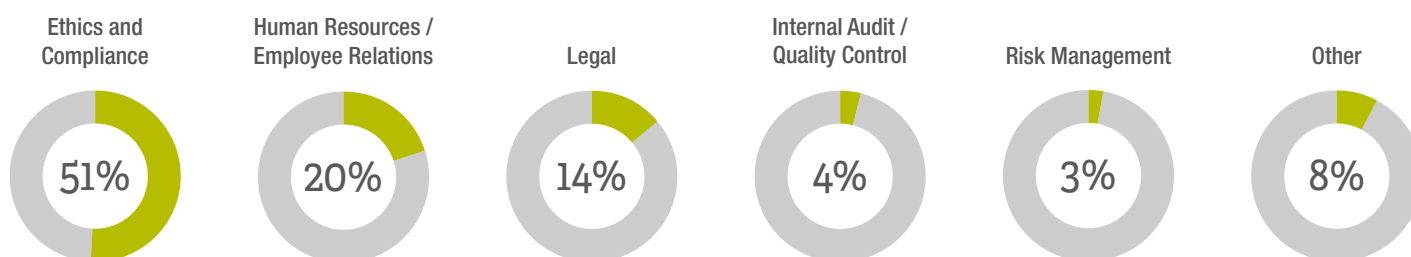
Note: Due to rounding, some percentages may total over 100%.

EXECUTIVE SUMMARY

This is the third year that NAVEX Global has published a market benchmark report on the state of ethics and compliance training. Each year new insights and a few surprises are revealed. This year, for the first time, we have been able to compare and contrast key measurements across several years to uncover trends and movement in E&C training programs.

This year's survey was designed to expand on the core set of questions we asked in the previous two years to focus on several key concepts that seemed to be emerging in the marketplace. We have sought to demonstrate not only that including organizational executives and Boards in training strategies is necessary but also that it benefits the organization, improves the effectiveness of a training program and represents best practices. This report shows that when organizations commit resources and assign structure to their ethics and compliance programs, there is a positive relationship between investment and outcomes.

The following key themes emerged from our data:

» **Culture is the top training objective for the third consecutive year.** *Create a culture of ethics and respect* is the most important E&C training objective (70 percent selected this as one of their top three objectives), followed by comply with laws and regulations, the second-most-important objective (at 60 percent).

» **Mature training programs are seeing more benefits.** Program maturity is linked to program results and benefits. Organizations with more-mature and sophisticated training programs (advanced and maturing) see benefits that far outpace those experienced by basic and reactive training programs; the benefits are seen across a wide range

of desired outcomes (including employee morale, leadership trust, behavior change and speak-up culture). Organizations with advanced and maturing training programs are more inclined to list multiple benefits from their training plans, including more-effective execution of their training programs, better recognition of gaps and an ability to cover more risk topics. Demonstrating the connection between program maturity and desired outcomes will help organizations advocate for investment in initiatives designed to drive program maturity.

» **Organizations are being asked to do more with less.** Organizations of all sizes are facing some big challenges in the coming years, such as limited hours available for training, adding courses to cover more risk areas, modernizing compliance-learning to appeal to millennials and keeping content up-to-date with changes in regulations. Insufficient budgets that are not growing and small numbers of program staff will make meeting these challenges difficult. Solving for these challenges will require greater creativity and program structure. Education planning, use of micro-learning, a mix of e-learning formats, improving effectiveness assessments and risk-based topic assignments are strategies that organizations will need to adopt to meet today's program challenges.

» **Significant gaps remain with respect to Board training.** Board training is an important aspect of a successful ethics and compliance program; to conduct effective oversight, directors must understand the risks facing the organization they are tasked with overseeing. Despite this, of the 58 percent of the organizations that train their Board, only 20

percent offer training to new directors, with four out of five missing out on an important opportunity to communicate about values, code and compliance programs. In the most pressing areas, Boards are trained at a rate that is astonishingly low when compared with employee training; most notably, Boards are trained on cyber security by only 13 percent of organizations (compared with 69 percent that do employee training). This risk area is one of the most pressing risks and one about which Boards are desperately in need of information. Failing to educate directors about key risks and program features is a major program vulnerability.

» **There are significant topical gaps between Board and employee training.** In addition to cyber security, there were significant gaps on training topics offered to Boards when compared with training plans for employees. The most notable gaps were related to workplace harassment—only 7 percent of organizations are offering their Boards training on this topic (compared with 76 percent that have this topic on their training plans for employees)—and conflicts of interest, where only 19 percent are offering their Boards training on this topic (compared with 76 percent that have this topic on their training plans for employees).

» **Evaluation of E&C training continues to lack sophistication.** Measuring training-program effectiveness is a top three challenge for 30 percent of organizations. As a key budget line item, optimizing the dollars spent and training time used is important, but most programs are still struggling to truly assess training effectiveness. Nearly two-thirds use training

completion rates as a way of measuring effectiveness. More-rigorous methods, such as learner satisfaction surveys and assessing behavioral or cultural change, are practiced by 25 percent or fewer organizations. Linking E&C training to business results and corporate brand reputation is practically nonexistent.

» **There is limited technological innovation in E&C training delivery.** Most organizations are focused on basic "blocking and tackling" when it comes to E&C training delivery: planned training activities tend to focus on adding courses, assigning courses based on learner risk and focusing on middle managers. The challenges facing programs hinder their ability to focus on program innovations and advancements. Activities like implementing mobile-learning, adding gamification, creating training portals and offering just-in-time-learning and collaborative or social learning are enhancements that fewer than one in five programs are working on.

ALIGNING TRAINING PROGRAMS WITH RISK IS GAINING MOMENTUM.

Assigning courses based on learner role or risk is one of the top training trends in 2016 (39 percent). In 2015, 15 percent of respondents reported that they planned to assess and assign titles based on an organizational risk assessment. Risk-based topic assignment is essential to improving program effectiveness and efficiency.

KEY FINDINGS

1. The State of Ethics and Compliance Training Today

What are the top E&C training objectives?

Findings: Our survey revealed two primary motivations for organizations pursuing ethics and compliance training: Create a culture of ethics and respect (70 percent) and comply with laws and regulations (60 percent). Improve employee understanding of compliance priorities and obligations—a new category in 2016—was the third-most-important objective (45 percent).

» *Creating a culture of ethics and respect* is more important to midsized organizations (71 percent) and large organizations (76 percent) than it is to small organizations (58 percent). *Complying with laws and regulations* is more important to small organizations (71 percent) than it is to large organizations (51 percent).

Analysis: Creating a culture of ethics and respect is a top training-program objective again this year, with 70 percent saying it is a top objective. Training can be a vehicle of cultural change through building trust, increasing skills, improving decision making across an organization and aligning people around a core set of values and expectations.

Organizations with advanced training programs see these benefits at much higher rates than those with less sophisticated programs. Despite the connection to these results, many organizations fall short and fail to improve culture by losing focus of their key objectives, allowing cost and other considerations to undermine the quality of their program.

What E&C training objectives are most important to your organization today?
(Respondents ranking their top three objectives)

Objective	Percentage
Create a culture of ethics and respect	70%
Comply with laws and regulation	60%
Improve employee understanding of compliance priorities and obligations	45%
Prevent future issues or misconduct	28%
Improve program with more engaging and effective content	24%
Keep information secure and protected	22%
Train leaders and managers on their unique obligations	21%
Meet audit or certification requirements	11%
Reinforce tone at the top	11%
Establish strong legal defenses	5%
Respond to penalties, lawsuits or sanctions	2%
Other	>1%

[n=644]

Multiple-response questions; percentages may not add up to 100%.

What are the top E&C training challenges?

Findings: Limited hours available for training and keeping content up-to-date with changes in regulations are the top challenges facing organizations today. Measuring training program effectiveness and not enough budget to create desired program are also challenges for many organizations.

» Keeping content up-to-date and compliance education and communications planning are greater challenges for small organizations compared with large ones (51 percent and 27 percent, respectively), while learner fatigue and training a global audience were greater challenges for large organizations. Keeping content up-to-date was also a greater challenge for organizations with limited training budgets of less than $25,000 (43 percent).

Analysis: Basic challenges continue to hamper the success of training programs. Unfortunately, the challenges that are most daunting for respondents have persisted since our survey was first conducted three years ago. The inability to see much movement on the most pressing challenges suggests that programs are not able to overcome these obstacles and don't have full leadership support for training program needs.

Limited hours available for training continues to be the number 1 challenge. Combined with limited budget – at number 4 – this demonstrates compliance professionals struggle to show how training adds value to the bottom line.

What are the top three challenges to your organization when it comes to E&C training?

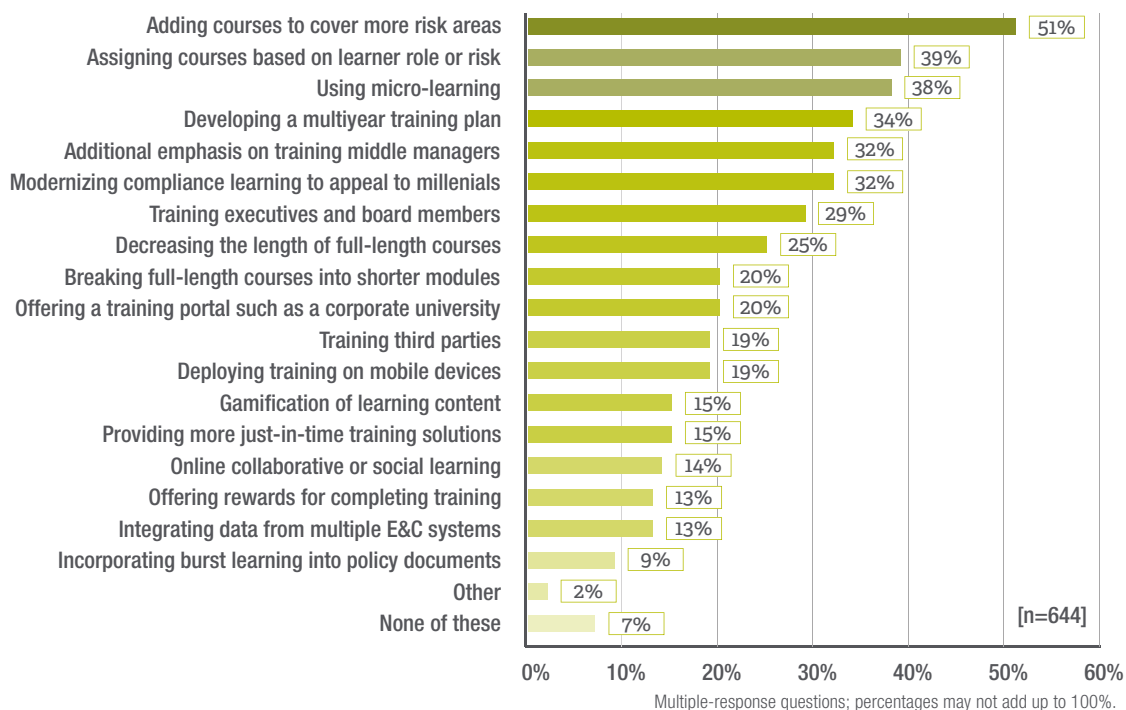| Challenge	%
Limited hours available for training	36%
Keeping content up-to-date with changes in regulations	36%
Measuring training program effectiveness	30%
Not enough budget to create desired program	26%
Difficulty covering all important topics	22%
Training a global audience	18%
Content is low quality/not engaging	18%
Compliance education and communications planning	17%
Operationalizing	17%
Learner fatigue	17%
Not enough support from managers and executives	17%
Difficultly training off-line learners	13%
Training is not effective at changing attitudes or behavior	11%
Employees don't find training relevant, useful or helpful	11%
Difficulty maintaining and updating our self-produced content	7%
Other	3%

[n=644]

What are the overall training activities?

Findings: The top training trend is adding courses to cover more risk areas. This was followed by assigning courses based on learner role or risk and using micro-learning.

» The top training activities have remained the same in 2016, with the exception of assigning courses based on role or risk, which has become more relevant in 2016.

» *Modernizing compliance-learning to appeal to millennials*, *Deploying training on mobile devices* and *Training third parties* are mentioned more often by those with maturing and advanced training programs.

Analysis: The unfortunate reality is that training programs must constantly evolve, and in today's legal and regulatory environment organizations will continue to see greater regulation and an increase in actual training mandates. The pressure of meeting minimum training requirements is reflected in the top priority for training programs—with a majority of respondents (51 percent) saying they are adding more courses. But budget and seat time constraints mean that organizations must get creative to meet their requirements. Those respondents that are focusing on using role-based training assignments, using micro-learning, multiple formats and developing a multiyear training plan are taking steps in that direction.

Which of the following training activities are you currently implementing or plan to implement in the next two years?

Training activity	Percentage
Adding courses to cover more risk areas	51%
Assigning courses based on learner role or risk	39%
Using micro-learning	38%
Developing a multiyear training plan	34%
Additional emphasis on training middle managers	32%
Modernizing compliance learning to appeal to millenials	32%
Training executives and board members	29%
Decreasing the length of full-length courses	25%
Breaking full-length courses into shorter modules	20%
Offering a training portal such as a corporate university	20%
Training third parties	19%
Deploying training on mobile devices	19%
Gamification of learning content	15%
Providing more just-in-time training solutions	15%
Online collaborative or social learning	14%
Offering rewards for completing training	13%
Integrating data from multiple E&C systems	13%
Incorporating burst learning into policy documents	9%
Other	2%
None of these	7%

[n=644]

Multiple-response questions; percentages may not add up to 100%.

How mature are E&C training programs?

Findings: Respondents were asked to categorize the maturity of their E&C training program:

» Reactive: Address issues as they arise with no formal plan (7 percent of organizations)

» Basic: Training on basic topics only (32 percent)

» Maturing: Have a basic plan for the year that covers a handful of topics with limited risk and role-based topic assignments; effectiveness measures are limited to completion rates and qualitative feedback (50 percent)

» Advanced: A sophisticated multiyear training plan that covers a variety of topics assigned to specific audiences based on need and risk profile that includes live and e-learning, short-form and long-form courses and a variety of engaging formats; a disciplined approach to reporting and measuring training effectiveness that focuses on training outcomes (12 percent)

Analysis: Training programs have been slow to mature even when they have been in place for many years. Though training often represents the largest non-salary budget item and programs benefit from structure and formality, only 12 percent of respondents meet the criteria of an advanced program and 50 percent are maturing.

Nearly 40 percent rate their programs as basic or reactive. In today's enforcement environment, these programs are likely to face heightened scrutiny and are not likely to experience the program benefits experienced by more-mature programs. Reactive and basic programs must analyze and apply the program elements of maturing and advanced programs to improve their effectiveness.

Choose the option that best describes your organization's E&C training program.

[n=644]

Advanced	Maturing	Basic	Reactive
12%	50%	32%	7%
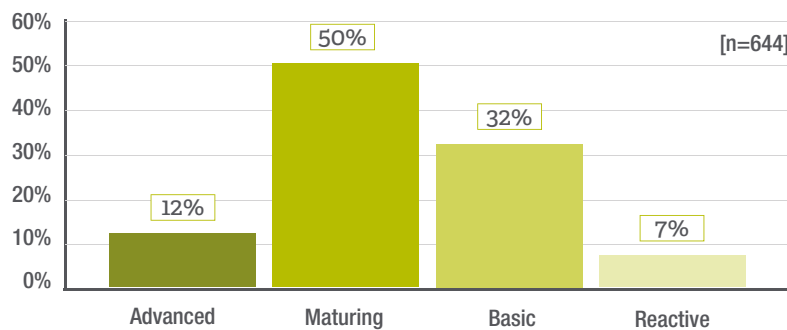
2. Benchmark Ethics & Compliance Training

What are the elements of E&C training programs?

Findings: The most common components of E&C training programs are mandatory assigned E&C training, training for new staff and e-learning. Micro-learning, mobile-enabled training, and social or collaborative-learning are less widely implemented, with only about one in five organizations incorporating them into their E&C training.
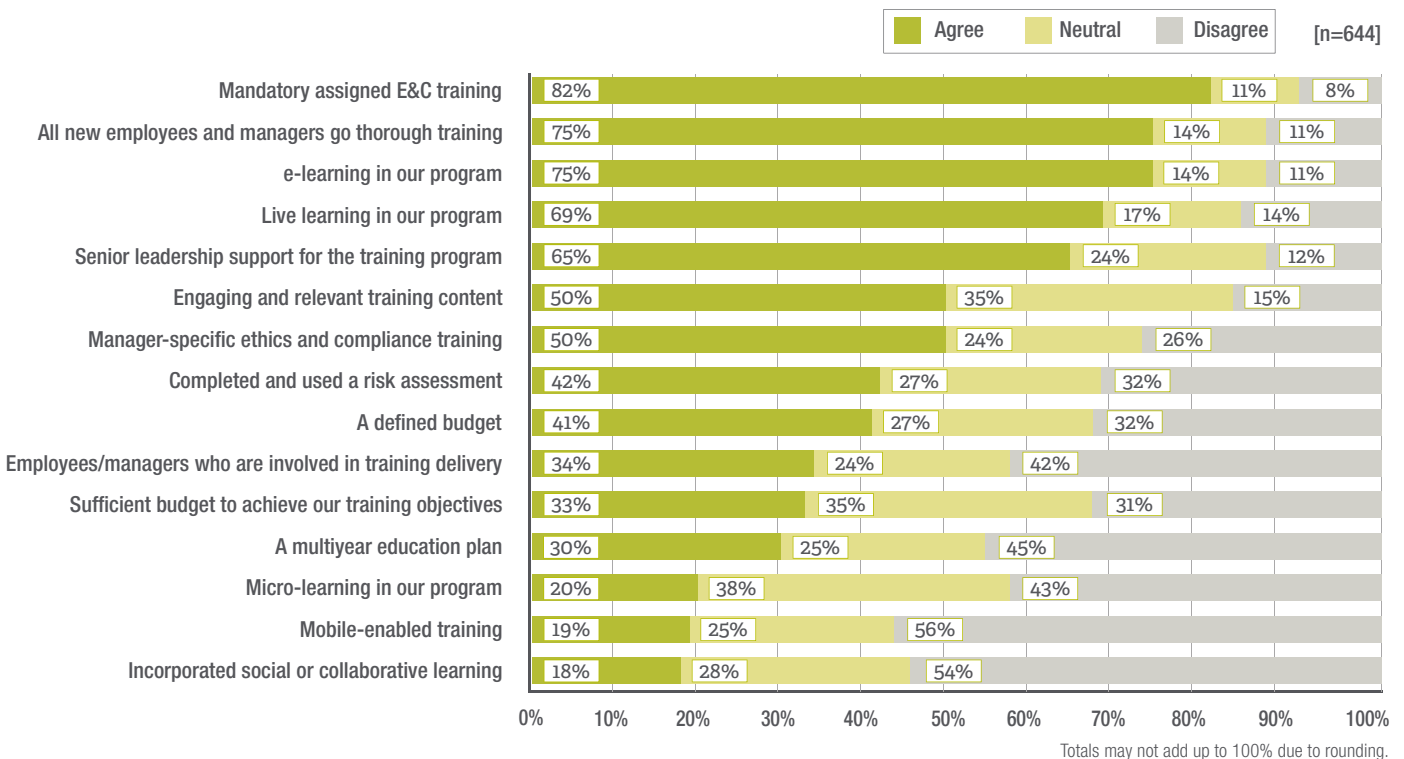
» For the most part, large organizations, those with large training budgets and those with advanced training programs, have a greater number of elements in their E&C training programs.

Analysis: Although training programs are unique to each organization, certain fundamental features are critical for success. For example,

most organizations are using both e-learning (75 percent) and live-learning (69 percent), suggesting that blended learning is occurring with great frequency. Likewise, a high number of organizations make training mandatory (82 percent) and train employees and managers when hired (75 percent); new-hire training is vital to help educate employees about culture and risks and whether values are to be applied to decision making.

Good foundations can be disrupted, however, when there is misalignment of key program elements. Although mandatory training is the norm, only 65 percent believe that they have senior leadership support for the training program. This nearly 20 percentage point gap is troubling, as managers who are not supportive can undermine the effectiveness of even mandatory programs.

Rate your agreement with the following statements: We have these elements in our E&C training program.

| | Agree | Neutral | Disagree | [n=644] |

Element	Agree	Neutral	Disagree
Mandatory assigned E&C training	82%	11%	8%
All new employees and managers go thorough training	75%	14%	11%
e-learning in our program	75%	14%	11%
Live learning in our program	69%	17%	14%
Senior leadership support for the training program	65%	24%	12%
Engaging and relevant training content	50%	35%	15%
Manager-specific ethics and compliance training	50%	24%	26%
Completed and used a risk assessment	42%	27%	32%
A defined budget	41%	27%	32%
Employees/managers who are involved in training delivery	34%	24%	42%
Sufficient budget to achieve our training objectives	33%	35%	31%
A multiyear education plan	30%	25%	45%
Micro-learning in our program	20%	38%	43%
Mobile-enabled training	19%	25%	56%
Incorporated social or collaborative learning	18%	28%	54%

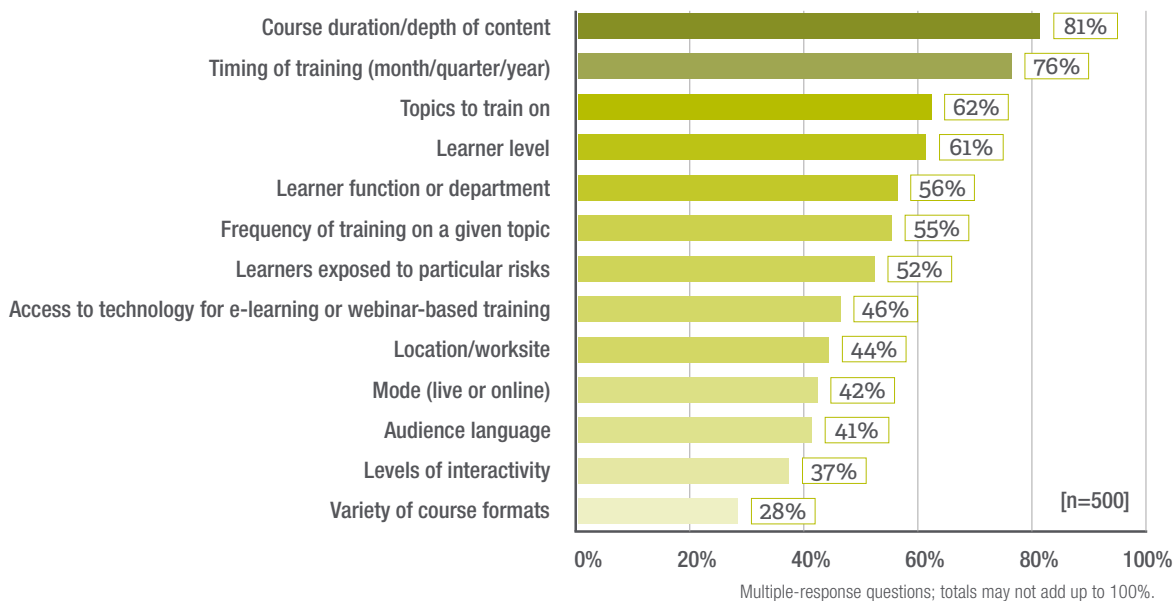Totals may not add up to 100% due to rounding.

What are the considerations when creating a compliance education plan?

Findings: Compliance education planning is an emerging practice that has gained popularity in the past three years; currently 34 percent of respondents indicate that they are or will be focusing on education planning. Organizations that have yet to start this process should do so— and they should start with a basic plan that can evolve over time.

Analysis: Most plans, and those that constitute basic education plans, take into account the length of the course (81 percent), the topics that need to be trained on (62 percent), the level of the learner (61 percent) and the timing of the training (76 percent). These fundamental elements are required to build a basic curriculum. Basic plans should take into consideration the frequency of training on a topic, but only 55 percent report using this factor.

As programs mature and compliance education plans evolve, additional factors are considered to drive efficiency and the effective use of budget dollars. Some of these advanced considerations include risk-based assignment of topics (52 percent), levels of interactivity (37 percent) and mode (42 percent).

Which of the following do you consider/include in the process of creating your compliance education plan?

Consideration	Percent
Course duration/depth of content	81%
Timing of training (month/quarter/year)	76%
Topics to train on	62%
Learner level	61%
Learner function or department	56%
Frequency of training on a given topic	55%
Learners exposed to particular risks	52%
Access to technology for e-learning or webinar-based training	46%
Location/worksite	44%
Mode (live or online)	42%
Audience language	41%
Levels of interactivity	37%
Variety of course formats	28%

[n=500]

Multiple-response questions; totals may not add up to 100%.

How has creating a formal compliance education plan helped organizations?
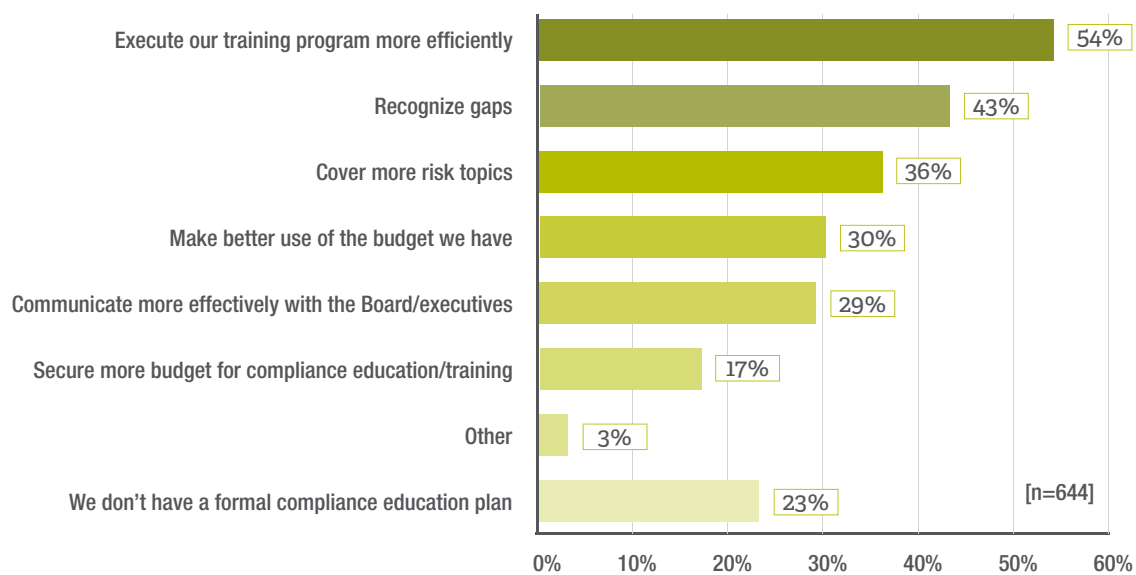
<u>Findings:</u> Close to one-quarter of respondents (23 percent) do not have a formal compliance education plan in place.

» Large organizations are more inclined than small organizations to mention multiple benefits from their education plans, including *Execute our training program more efficiently* (59 percent versus 45 percent), *Cover more risks* (40 percent versus 30 percent), *Make better use of the budget we have* (36 percent versus 23 percent) and *Communicate more effectively with the Board/executives* (33 percent versus 23 percent).

» Not surprisingly, a formal compliance education plan is less prevalent among respondents with reactive training programs (50 percent don't have them) and those without training budgets (40 percent don't have them).

<u>Analysis:</u> An emerging and strong trend is to bring greater structure to the courses that are deployed, how often and to which audiences— also called education planning or curriculum mapping. By combining the results from the overall training activities question on page 10 with these results, we can see that in the past two years education planning has emerged as a strong trend, with 62 percent of organizations with advanced and maturing training programs reporting that they have such a plan in place, and 34 percent of all respondents focusing on education planning in the next two years.

How has creating a formal compliance education plan helped your organization?

Category	Percent
Execute our training program more efficiently	54%
Recognize gaps	43%
Cover more risk topics	36%
Make better use of the budget we have	30%
Communicate more effectively with the Board/executives	29%
Secure more budget for compliance education/training	17%
Other	3%
We don't have a formal compliance education plan	23%

[n=644]

What is the dedicated budget for E&C training?

Findings: More than one quarter of respondents (28 percent) indicate that their organization does not have a dedicated budget for ethics and compliance training.

» 24 percent of large organizations and 32 percent of medium-sized organizations report $0 dedicated budget for E&C training. While it is less of a surprise that 48 percent of respondents with reactive programs report $0 dedicated budget, 15 percent of respondents with advanced programs report the same.

» 31 percent of large organizations report a training budget of $100,000 or more, and 39 percent of those with advanced training programs have training budgets of $100,000 or more.
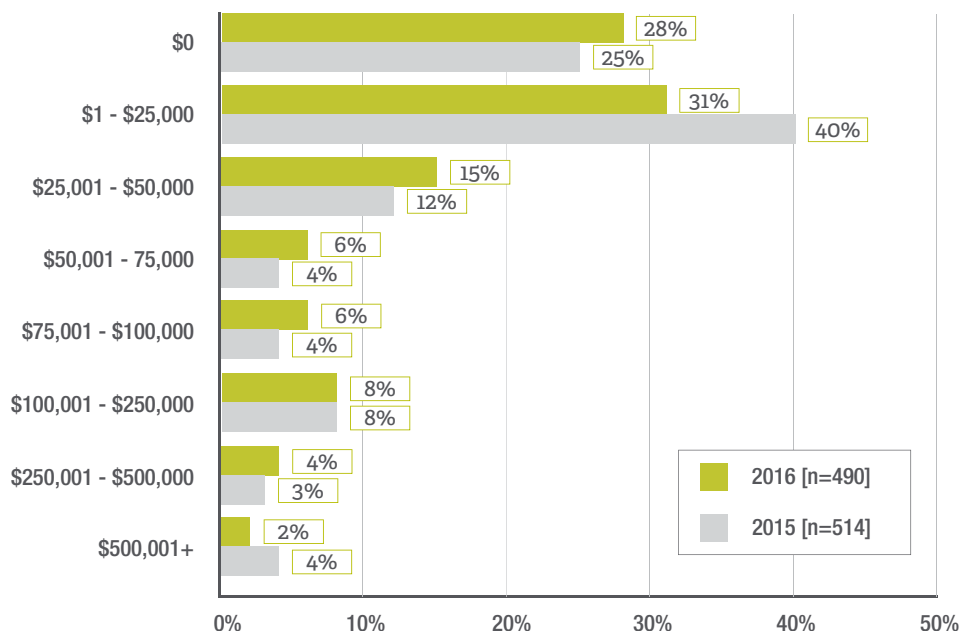
Analysis: There is a correlation between program maturity and size of budget. Organizations with larger budgets tend to have more-mature programs and are more likely to recognize the benefits of program maturity. Organizations with smaller budgets are more likely to report that they have reactive (42 percent) or basic (41 percent) training programs.

The number of programs (28 percent) that continue to operate without a dedicated budget for training is troubling. This major program deficiency is shared equally across organizations of all sizes (large, 24 percent; medium, 32 percent; and small, 29 percent). And the lack of a defined budget is a characteristic found in basic and reactive programs (81 percent).
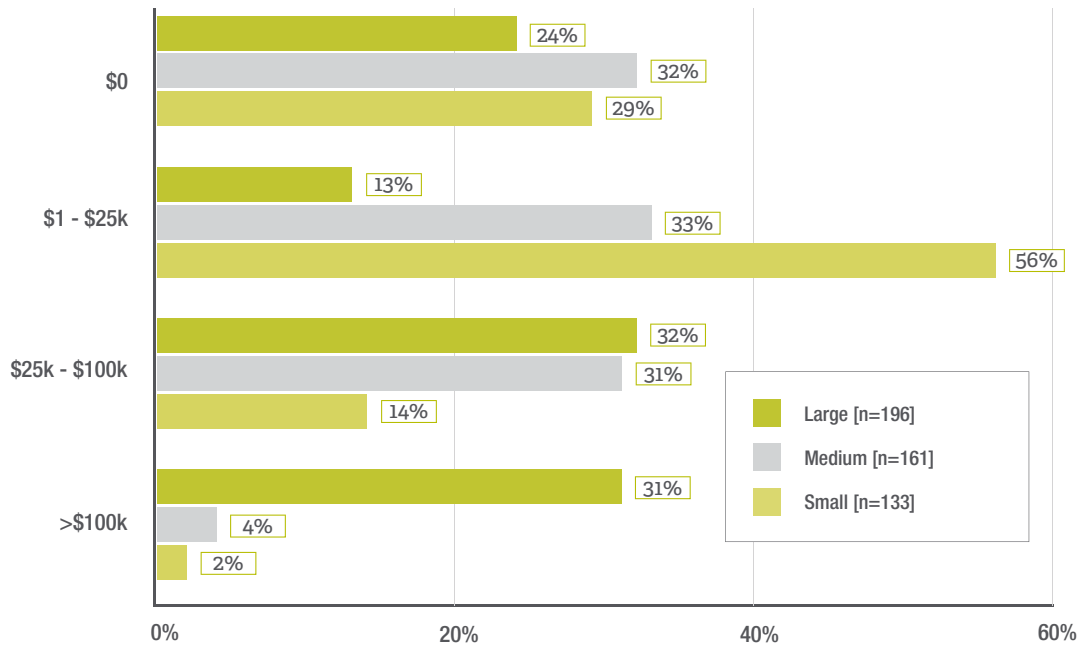
What is your organization's total dedicated budget for Ethics & Compliance training?
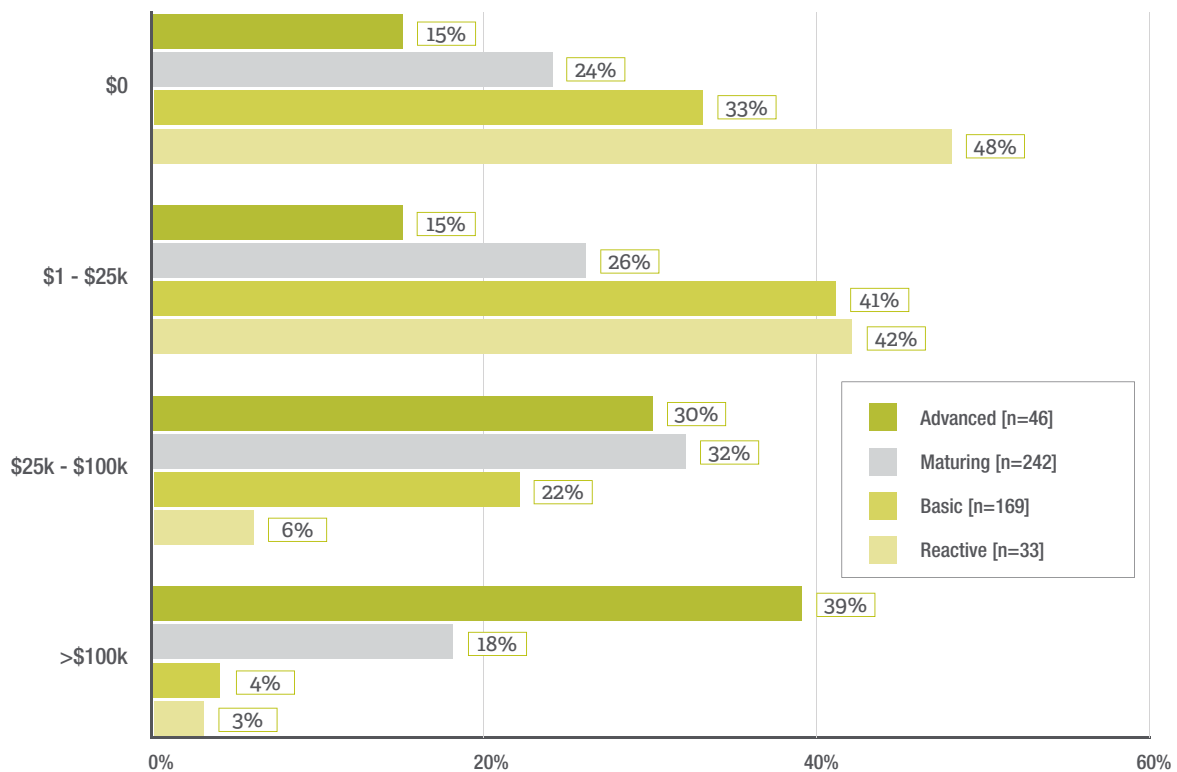(not including FTE salaries)

TOTAL Dedicated Budget (2015 and 2016)

Budget	2016 [n=490]	2015 [n=514]
$0	28%	25%
$1 - $25,000	31%	40%
$25,001 - $50,000	15%	12%
$50,001 - 75,000	6%	4%
$75,001 - $100,000	6%	4%
$100,001 - $250,000	8%	8%
$250,001 - $500,000	4%	3%
$500,001+	2%	4%

Dedicated Budget by Org. Size

$0	Large 24%, Medium 32%, Small 29%
$1 - $25k	Large 13%, Medium 33%, Small 56%
$25k - $100k	Large 32%, Medium 31%, Small 14%
>$100k	Large 31%, Medium 4%, Small 2%

Legend:
- Large [n=196]
- Medium [n=161]
- Small [n=133]

Budget by Program Maturity

$0	Advanced 15%, Maturing 24%, Basic 33%, Reactive 48%
$1 - $25k	Advanced 15%, Maturing 26%, Basic 41%, Reactive 42%
$25k - $100k	Advanced 30%, Maturing 32%, Basic 22%, Reactive 6%
>$100k	Advanced 39%, Maturing 18%, Basic 4%, Reactive 3%

Legend:
- Advanced [n=46]
- Maturing [n=242]
- Basic [n=169]
- Reactive [n=33]

Which departments help pay for E&C training?

Findings: Among the respondents who do have a dedicated training budget, most source that budget primarily through their Ethics and Compliance department. On average, two departments contribute to paying for E&C training.

Analysis: This year's report continues to reflect a strong trend toward budget being sourced from multiple departments. The two most common budget contributors are predictably Ethics/Compliance (61 percent), and Human Resources/Employee Relations (41 percent). Although budget-strapped functions may look to other departments for help with purchasing training, moving toward a centralized budget may help drive efficiencies and bring greater control to the process of building and acquiring training.

Which Departments Help Pay for Ethics & Compliance Training?
(Respondents with dedicated budgets)

Department	Percentage
Ethics/Compliance	61%
Human Resources/Employee Relations	41%
Legal	34%
Training/Learning & Development	23%
Operations	10%
Risk	7%
Internal Audit	5%
Finance	5%
Procurement	2%
Other	4%

[n=487]

Multiple-response questions; totals may not add up to 100%.
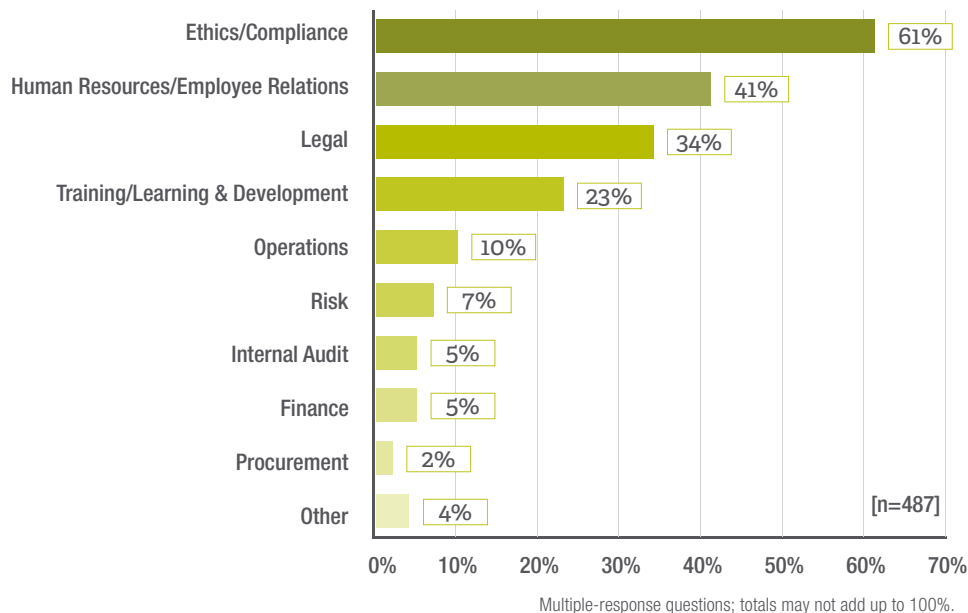
What is the anticipated change in E&C training budgets over the next 12 months?

Findings: Nearly two-thirds (65 percent) of organizations with dedicated training budgets anticipate that the budgets will stay the same over the next 12 months. Just over one-quarter (27 percent) anticipate an increase, and 8 percent anticipate a decrease.

» Nearly four of five smaller organizations anticipate that their budget will stay the same. Just under one-third of both medium and large organizations expect budget increases in the next year.

» A higher proportion of organizations with large training budgets (11 percent) and those with advanced training programs (18 percent) are expecting a decrease in their E&C training budgets.

» Those respondents reporting more-mature programs expect budget decreases more often than those still building toward advanced and mature programs.

Analysis: Organizations continue to report that they are being asked to do more with their programs: they need to cover more risk areas, improve the quality of their training offerings, modernize their training programs and keep up with regulatory change. But many will be tasked with doing this work on the same budget (65 percent), and an unfortunate 8 percent will be trying to do this work on a decreased budget.

In the next 12 months, how do you predict your Ethics & Compliance training budget will change?

	Increase
	Decrease
	No Change	[n=422]
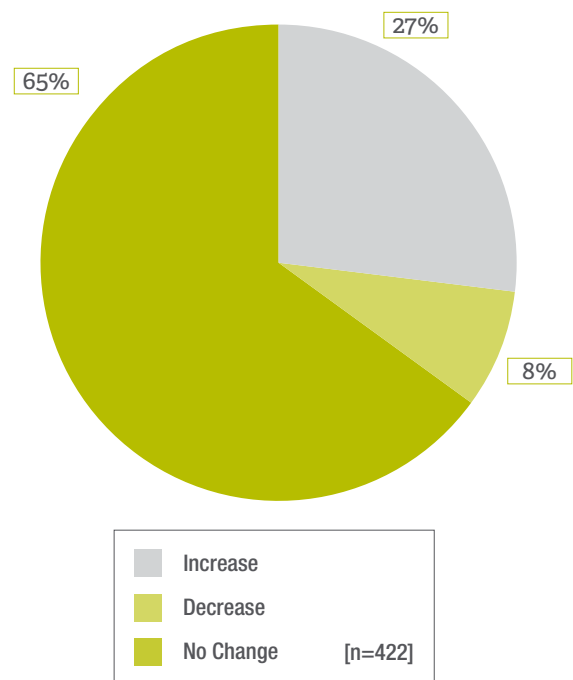
Totals may not add up to 100 percent due to rounding.

Organization Size	Large >5,000 employees [n=156]	Medium 500-5,000 employees [n=135]	Small <500 employees [n=101]
Stay the same	59%	64%	79%
Increase	31%	31%	12%
Decrease	11%	4%	9%

What proportion of E&C training budgets is spent on off-the-shelf e-learning?

<u>Findings:</u> In the past two years, respondents spent an average of 56 percent of their total E&C training budgets on off-the-shelf e-learning.

» Whereas nearly 90 percent of large organizations invest in e-learning, only 55 percent of small organizations invest in it. And where 73 percent of large organizations invest in live training, 64 percent of small organizations do as well.

» Organizations with maturing and advanced training programs spend a higher proportion of their budget on e-learning compared with those with reactive and basic programs.

<u>Analysis:</u> Most programs today use both live training and e-learning; but across organizations of all sizes, e-learning remains an important learning tool. Not surprisingly, larger and midsized organizations tend to spend a greater proportion of their budget on e-learning compared with small organizations. Smaller organizations are often better able to conduct live training sessions, reducing their immediate need to invest in e-learning solutions.

Small organizations, however, are increasingly feeling the pressure that comes with increased regulatory scrutiny and other compliance priorities that demand their time and attention. Having a small compliance staff makes it more difficult to deliver timely and effective live training. For small organizations, consistency of message, more efficient use of training time and reduced burden on compliance professionals tasked with live training responsibilities will be benefits they experience as they use e-learning more often.

What percentage of respondent organizations are using live and e-learning?
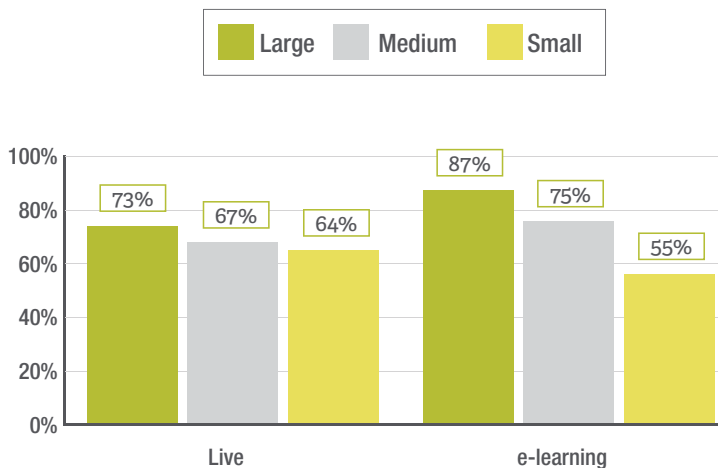
Over the past two years, what percentage of your total E&C training has been on off-the-shelf e-learning?
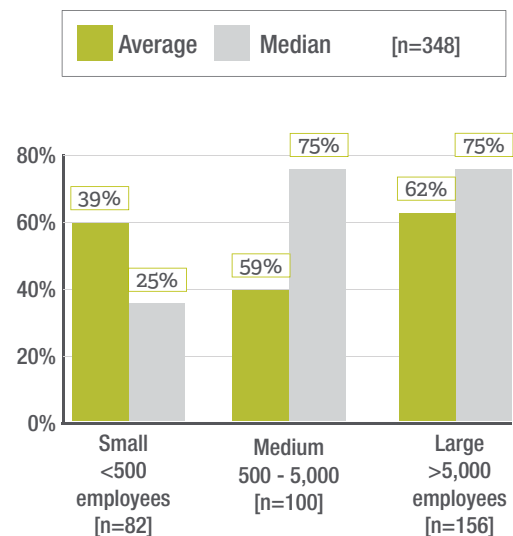
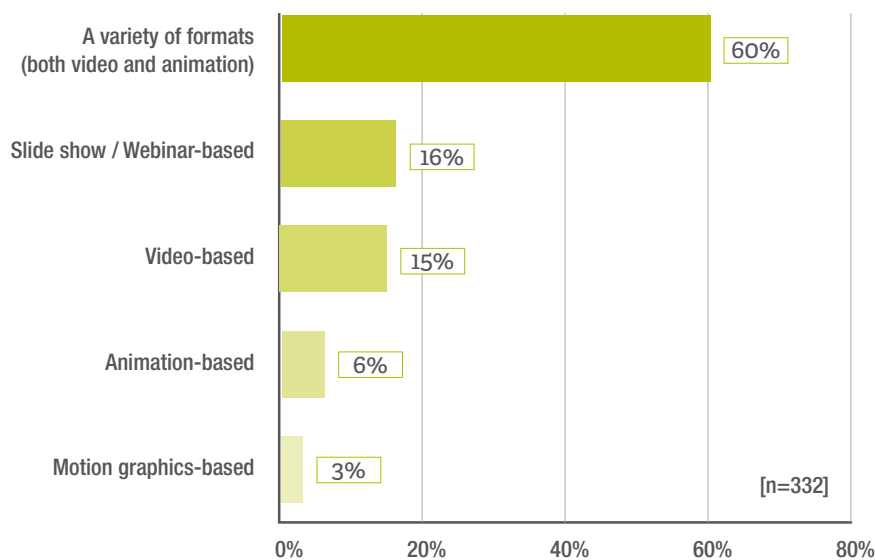# What are the preferred e-learning training formats?

Findings: The majority of respondents (60 percent) prefer a variety of formats for for e-learning.

» A higher proportion of small organizations (24 percent) prefer slide show / webinar-based formats when compared to large organizations (12 percent).

Analysis: As organizations strive to combat learner fatigue and cynicism, it has become increasingly important to be more deliberate about the styles of the courses that they deploy. Deploying the same course multiple times or using the same format for every course deployment can undermine the effectiveness of a program and drive employees to tune out or devalue the message. As such, compliance professionals have developed a strong preference for creating variety in their program through using a combination of course formats. With 60% of respondents indicating that they prefer an approach that allows them to use multiple formats, including video and vector animation, to educate and engage their learners.

When training various audiences in your organization, do you prefer e-learning formats that are:

Format	Percentage
A variety of formats (both video and animation)	60%
Slide show / Webinar-based	16%
Video-based	15%
Animation-based	6%
Motion graphics-based	3%

[n=332]

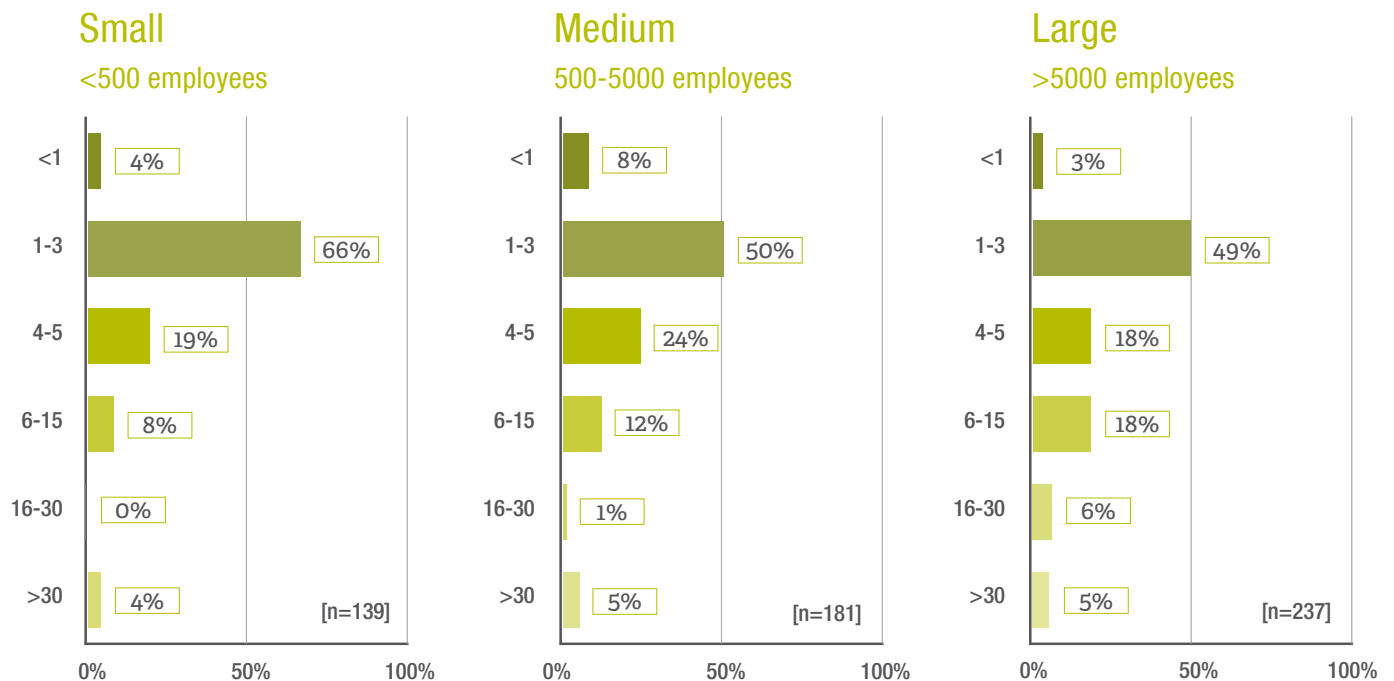# How many FTEs are involved in E&C training programs?

Findings: The number of full-time equivalent (FTE) employees involved in ethics and compliance training has remained relatively steady since 2015, with more than half (54 percent) of respondents indicating that they have one to three FTE employees involved.

» Those with advanced training programs have a greater tendency to report having six or more FTEs (37 percent) compared with those with maturing (19 percent), basic (18 percent) and reactive (26 percent) training programs.

Analysis: Organizations of all sizes remain hampered by limited staff available to manage training program initiatives. Across organizations of all sizes, programs on average have only one to three FTE employees dedicated to the management of E&C training.

Although technology can help streamline workflows, significant staff time is still required to develop, administer, track, plan and report on program achievements. And as many organizations are actively using both e-learning and live training in their programs, significant time is required to both develop and deliver such training.

How many full-time equivalent (FTE) employees in your organization are responsible for the management, creation or delivery of Ethics & Compliance training?

Small
<500 employees

FTE	%
<1	4%
1-3	66%
4-5	19%
6-15	8%
16-30	0%
>30	4%

[n=139]

Medium
500-5000 employees

FTE	%
<1	8%
1-3	50%
4-5	24%
6-15	12%
16-30	1%
>30	5%

[n=181]

Large
>5000 employees

FTE	%
<1	3%
1-3	49%
4-5	18%
6-15	18%
16-30	6%
>30	5%

[n=237]

What are the anticipated training topics?

Findings: Going forward, organizations plan to provide training on a range of topics, with code of conduct/ethics, conflicts of interest and workplace harassment mentioned most often. Organizations generally offer training on these topics multiple times each year.

» The top three topics have remained the same in 2016: code of conduct/ethics, conflicts of interest and workplace harassment.

» Medium and large organizations are more inclined than smaller ones to indicate that they will provide training on a range of topics such as bribery and corruption, insider trading, conflicts of interest, speaking up and reporting/anti-retaliation, gifts and gratuities, and diversity and inclusion.

» Smaller organizations are more inclined to anticipate training programs related to wage and hour laws (34 percent versus 25 percent of large organizations) and cyber-/information security and HIPAA (51 percent versus 34 percent of large organizations).

Analysis: On average, organizations train on approximately 12 topic areas during a typical two- to three-year training cycle and continue to emphasize key training topics that should be deployed to all learners, such as their code of conduct (93 percent), conflicts of interest (76 percent), harassment (76 percent), cyber security (68 percent) and retaliation (68 percent). This year cyber security has made the most significant jump (68 percent in 2016 compared with 38 percent in 2015) of any of the topics, reflecting a better understanding of the need to train to prevent human error.

The results also indicate that insufficient attention is being paid to other risks that should be addressed in every training program. Topics such as insider trading (30 percent), social media use (50 percent), asset use (44 percent), diversity (51 percent) and wage and hour (29 percent) represent risks for all industries. Better curriculum mapping, advancing program maturity, burst learning and increased seat time will help organizations do a better job of training on a wider array of topics in the coming years.

Little concrete guidance is available to inform decisions about training-topic frequency; the term periodic is often used in regulations, guidance and agency statements, but it is rarely defined. It is widely accepted that training on a risk area should not be a onetime event; employees need to be re-educated about the risks they face in their roles.

For all the topic areas listed, 70 percent or more of employers (who are training on that topic) do so at least every two years, with most conducting training on topics every year. However, between 12 percent and 23 percent of employers are trained on a topic only one time. A single training event can have immediate and short-term benefits, but over time employees will forget the lessons and the fact of training will become less beneficial in building legal defenses. For these organizations, a switch to periodic training is a critical program enhancement.

On which of the following topics will your organization provide training in the next 2-3 years?

	Percentage of organizations that will train on the topic	One time only	One or more times per year	Every two years	Every three or more years
COMPLIANCE TRAINING	[n = 644]				
Bribery Corruption	60%	14%	53%	27%	5%
Antitrust & Competition Law	46%	15%	43%	34%	8%
Government Contracting/Federal Acquisition Regulations Topics	31%	23%	48%	25%	5%
Insider Trading	30%	12%	51%	26%	11%
Money Laundering (AML)	25%	15%	58%	20%	7%
CONDUCT TRAINING	[n = 644]				
Code of Conduct / Ethics	93%	15%	65%	17%	3%
Conflicts of Interest (COI)	76%	15%	59%	21%	4%
Speaking Up and Reporting / Anti-retaliation	68%	13%	66%	18%	2%
Gifts & Gratuities	66%	15%	58%	20%	7%
Ethical Leadership / Decision Making	51%	17%	60%	19%	4%
Social Media	50%	17%	49%	25%	8%
Technology Use / Use of Assets	44%	16%	57%	21%	6%
Third Party Compliance	43%	18%	51%	23%	8%
Human Trafficking	11%	14%	39%	35%	12%
EMPLOYMENT LAW TRAINING	[n = 644]				
Workplace Harassment	76%	14%	55%	27%	4%
Discrimination	63%	17%	57%	22%	4%
Abusive Conduct / Bullying	53%	15%	56%	26%	4%
Workplace Violence	51%	16%	58%	21%	5%
Diversity & Inclusion	50%	16%	54%	24%	6%
Disability Accommodation (ADA)	31%	19%	60%	19%	2%
Wage & Hour Laws	29%	23%	48%	24%	5%
INFORMATION SECURITY TRAINING	[n = 644]				
Cyber Security / Information Security / Confidential Information	69%	14%	65%	17%	4%
Data Privacy	63%	13%	64%	18%	4%
HIPAA	41%	13%	73%	12%	3%

Multiple-response questions; totals may not add up to 100%.

How many training courses are deployed?

Findings: The median number of courses provided per learner group stayed relatively stable over the last three years. There are slight increases in the average number of courses provided to non-management, middle management and senior leaders. The regulatory environment for an organization had no apparent bearing on how many courses were deployed.
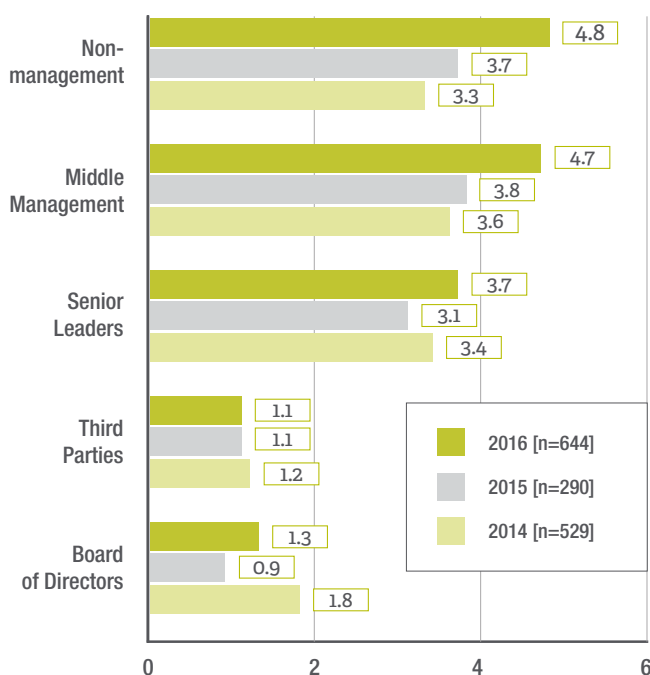
Analysis: The numbers suggest a recognition that managers need to receive additional and focused training to properly support their organization's ethics and compliance objectives. Both the average and median numbers for middle managers increased over last year. Adding an

hour of training is a significant event for most employers and reflects a commitment to this critical population of learners.
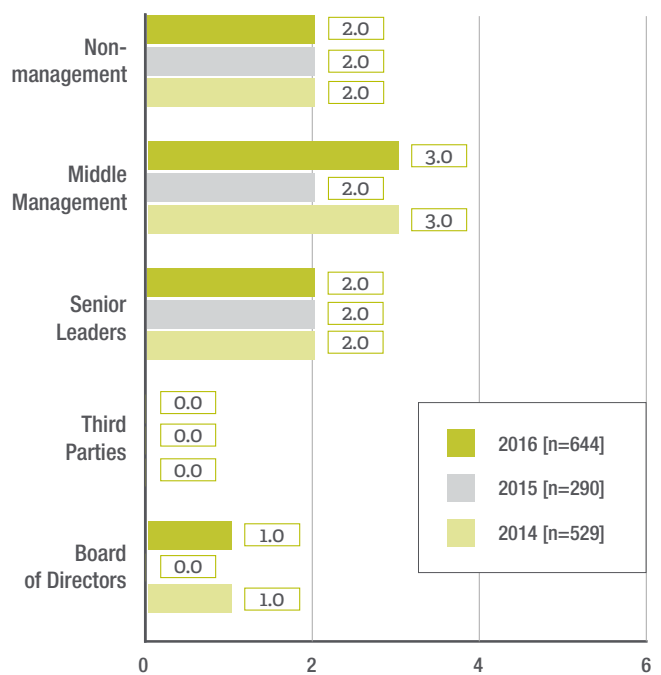
Board-level training, however, remains an area of vulnerability for E&C training programs. Boards have significant compliance program oversight responsibilities and face increasing scrutiny from all stakeholders. Directors are not often well versed in key trends, compliance program initiatives or emerging risk areas and as such need dedicated training to address these gaps.

How many compliance training courses do you provide annually to the following learners?

Average Number of Courses

Learner Group	2016 [n=644]	2015 [n=290]	2014 [n=529]
Non-management	4.8	3.7	3.3
Middle Management	4.7	3.8	3.6
Senior Leaders	3.7	3.1	3.4
Third Parties	1.1	1.1	1.2
Board of Directors	1.3	0.9	1.8

Median Number of Courses

Learner Group	2016 [n=644]	2015 [n=290]	2014 [n=529]
Non-management	2.0	2.0	2.0
Middle Management	3.0	2.0	3.0
Senior Leaders	2.0	2.0	2.0
Third Parties	0.0	0.0	0.0
Board of Directors	1.0	0.0	1.0

What types of Board training are provided?

Findings: In-person or live training is the most common approach to E&C training delivered to Boards, yet only 58 percent of respondent organizations (372 of 644 respondent organizations) are providing Board training.

Of those 372 respondent organizations that do provide Board training:

» 55 percent offer live training, and 41 percent enable access to e-learning.

» Those with training budgets in excess of $100,000 (51 percent) are more inclined than those with smaller (37 percent) or no fixed budgets (34 percent) to develop training content exclusively for their Boards.

» Organizations with training budgets of $25,000 or more (46 percent) are most inclined to offer e-learning courses to their Boards. Organizations with advanced training programs are more inclined to develop training content (58 percent) and e-learning content (19 percent) exclusively for their Boards.
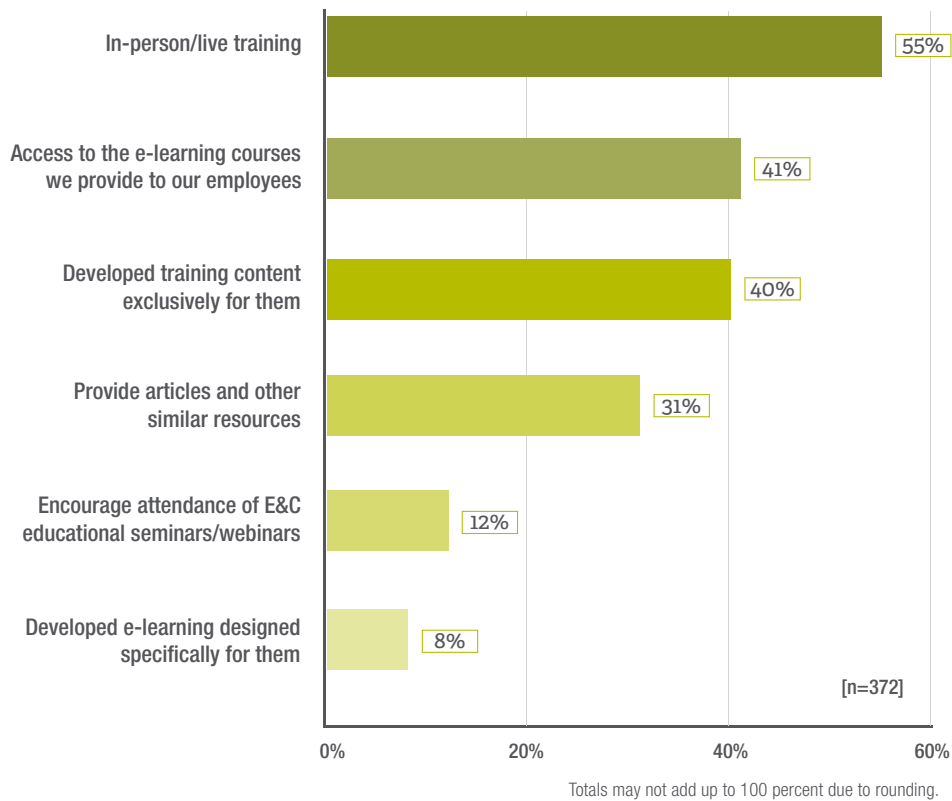
Analysis: Only 58 percent of respondents report that they are providing training to their Board. This number is incredibly low in light of the oversight responsibilities assigned to the Board.

In the absence of truly targeted or custom online-learning tools (only 8 percent offer this kind of training), compliance professionals most frequently turn to in-person training (55 percent) that may be a truly custom offering (40 percent) and e-learning courses that are deployed to the organization's employees (41 percent). While in-person training can be highly effective, access to e-learning courses and bursts offer an opportunity to improve skills and knowledge about a risk area at the time and place most convenient to each director and may help organizations increase director knowledge without significant impact on the director's time.

Lack of access and limited time in front of the Board are likely responsible for the low training numbers. Despite these challenges, organizations fail to use approaches that can improve skill without requiring actual time in front of the Board. Only 31 percent are providing access to articles or resource materials, and only 12 percent are encouraging attendance at conferences and seminars. These educational activities can be scheduled at the convenience of the individual director and do not require an organization to tap into tightly allocated Board presentation time.

Where Board training is provided, what best describes the types of training
you provide to your Board?

Type of training	Percentage
In-person/live training	55%
Access to the e-learning courses we provide to our employees	41%
Developed training content exclusively for them	40%
Provide articles and other similar resources	31%
Encourage attendance of E&C educational seminars/webinars	12%
Developed e-learning designed specifically for them	8%

[n=372]

0%   20%   40%   60%

Totals may not add up to 100 percent due to rounding.

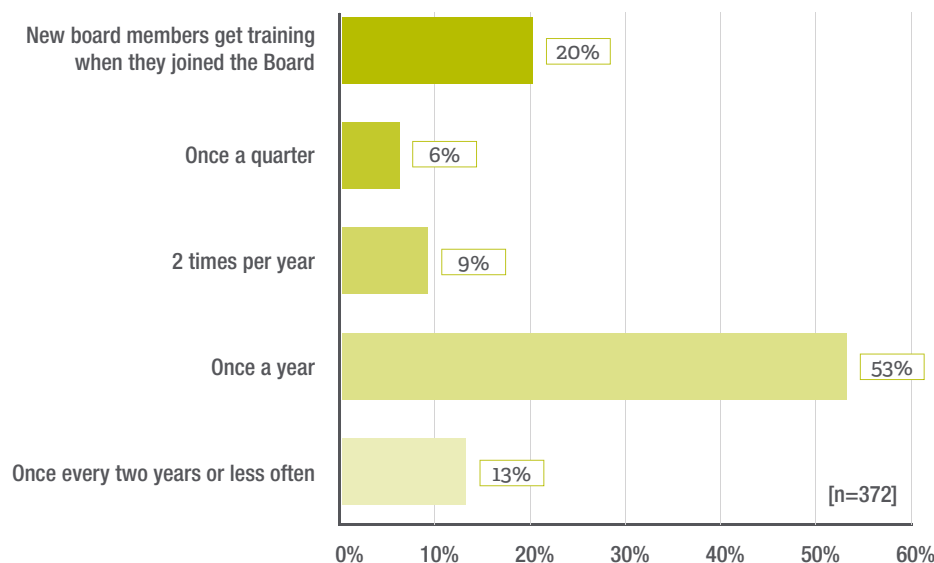# How often is E&C training delivered to the Board?

Findings: Of the 58 percent of respondent organizations that do train their Boards, they typically provide training on an annual basis. Twenty percent of them indicated that new Board members receive training when they join the Board.

Analysis: General knowledge about compliance topics and risks can be carried from one organization to the next. But education about the specific risks and challenges facing an organization, and the structure of the program and the tools being used, is vital to ensuring that a new director has the information needed to

exercise proper oversight over an organization's own compliance program. Unfortunately, only 20 percent of organizations provide training to new directors when they join the Board. Just like new employees, new directors should be introduced early on to the organization, its culture and values, and the ethics and compliance program.

For those who provide education to directors, 53 percent are providing it at least annually and 15 percent are offering it two to four times per year. Regular education on risks and program effectiveness is essential to ensure proper funding of the program and ensure that directors understand how to help the compliance program evolve.

Where Board training is provided, how often do you deliver E&C training to your Board?

Category	Percentage
New board members get training when they joined the Board	20%
Once a quarter	6%
2 times per year	9%
Once a year	53%
Once every two years or less often	13%

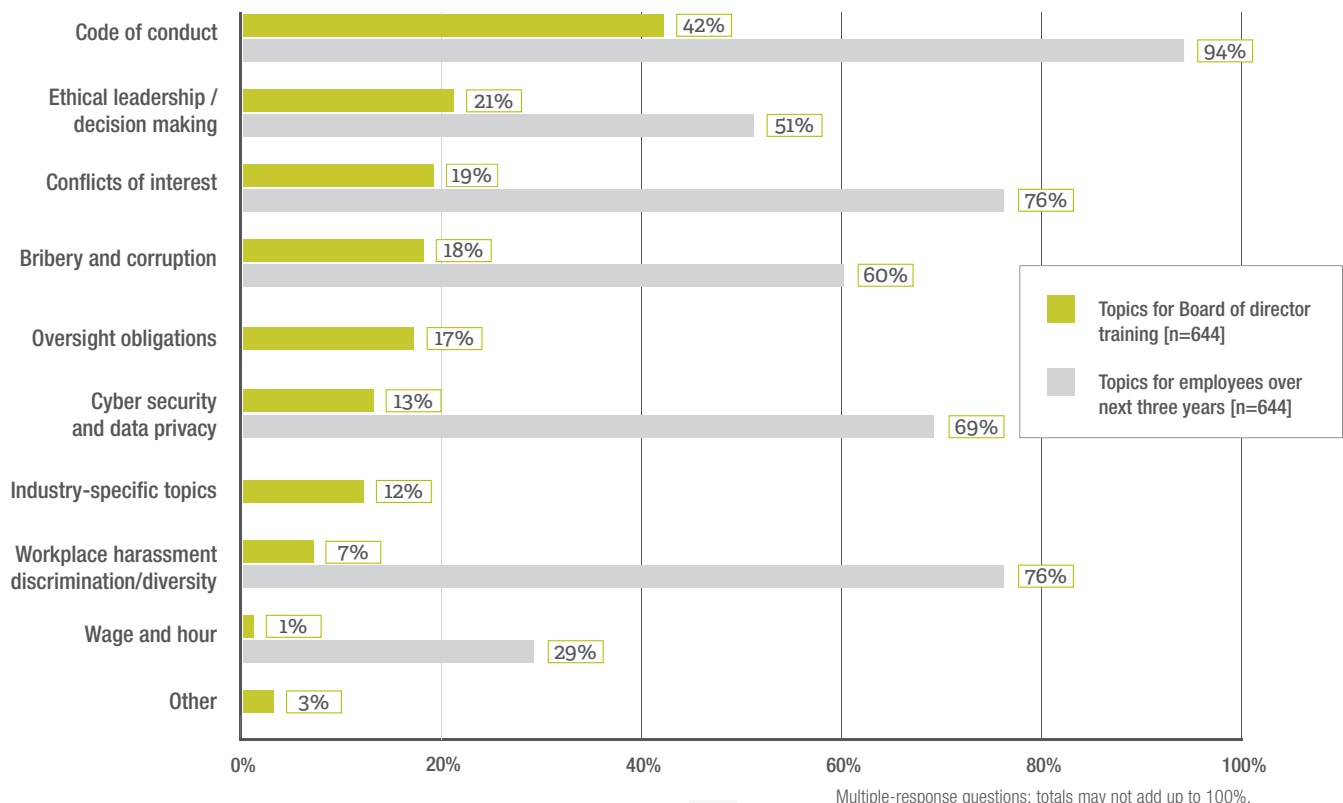[n=372]

What are the Board training topics?

Findings: With only 58 percent of respondents indicating their organization provides E&C training to their Board, there exists a stark difference between the topics on which Board members and employees are trained. Just 42 percent of Board members are trained on Code of conduct, 21 percent receive ethical leadership training, and fewer than 20 percent receive training on conflicts of interest, bribery and corruption, and oversight obligations.

Analysis: With limited time for training and many topics to cover, selecting what to train on can be a challenge. A handful of critical training topics are being provided to Boards at a dramatically lower rate than they are being provided to

employees, despite the need for Boards to be educated about these topics. Among the most significant are code of conduct (94 percent versus 42 percent), ethical leadership/decision-making (51 percent versus 21 percent), conflicts of interest (76 percent versus 19 percent) and cyber security and data privacy (69 percent versus 13 percent).

The first three represent core areas of competency and the disparity is concerning. The 56 percentage point difference in the cyber security training rate is most alarming; this risk area is a key focus of Boards and is one about which they are admittedly not well informed, making oversight very challenging. And just like employees, they may have access to sensitive and confidential information that can put the organization at risk if they fall prey to common tactics employed by cybercriminals.

Board Training versus Employee Training

Topic	Topics for Board of director training [n=644]	Topics for employees over next three years [n=644]
Code of conduct	42%	94%
Ethical leadership / decision making	21%	51%
Conflicts of interest	19%	76%
Bribery and corruption	18%	60%
Oversight obligations	17%	
Cyber security and data privacy	13%	69%
Industry-specific topics	12%	
Workplace harassment discrimination/diversity	7%	76%
Wage and hour	1%	29%
Other	3%	

Multiple-response questions; totals may not add up to 100%.

What approach is taken for non-U.S. learners?

<u>Findings:</u> Organizations are employing different approaches when it comes to E&C training for non-U.S. learners. Almost one-third indicate that they deploy the same courses as used in the United States, whereas just over half indicate that they translate the text. Only a minority attempt to customize their approach by developing training specific to the local region, by dubbing the course in the local language or by developing content featuring visual components familiar to the region.
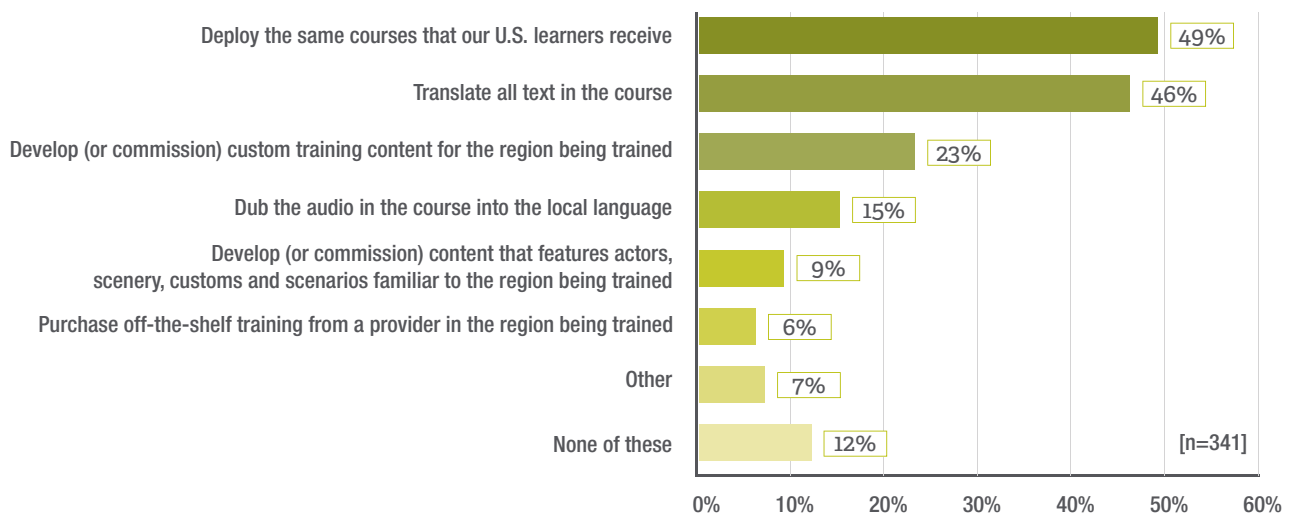
» Organizations that are headquartered in the United States are more inclined to deploy the same courses that U.S. learners receive (60 percent versus 34 percent of those headquartered elsewhere) and translate all text in the course (52 percent versus 40 percent).

<u>Analysis:</u> Training a global audience remains a challenge for many training programs. Fifty-three percent (341) of our survey respondent organizations are training at least some learners in a location other than their headquarters location—reflecting the global nature of the challenge. Training a global audience brings with it many unique challenges, including language capabilities, access to technology and localization of content.

The approach that organizations can take, however, is often limited by lack of budget and a desire to offer a program that is consistent and uniform in messaging. The two most common practices used by employers are to deploy the same courses to all employees (49 percent) and to translate all text in the course (46 percent). For most organizations, developing custom and localized content for learners, doing a full-video shoot that is localized and audio-dubbing content remain cost-prohibitive and too time-consuming for resource-constrained departments.

Which statements best describe your training approach for non-U.S. learners?
(Respondents who conduct E&C training outside the U.S.)

Approach	Percentage
Deploy the same courses that our U.S. learners receive	49%
Translate all text in the course	46%
Develop (or commission) custom training content for the region being trained	23%
Dub the audio in the course into the local language	15%
Develop (or commission) content that features actors, scenery, customs and scenarios familiar to the region being trained	9%
Purchase off-the-shelf training from a provider in the region being trained	6%
Other	7%
None of these	12%

[n=341]

How is training effectiveness measured?

Findings: Eighty-six percent of organizations report undertaking some formal E&C training effectiveness measurement, with training completion rate counts and post-training quizzes being the most common approaches.

» About one in five organizations with smaller training budgets (<$25,000) or no fixed budget indicate that their organization did not formally measure training effectiveness.

» Organizations with maturing or advanced E&C training practices are more inclined to measure training effectiveness using a range of metrics, compared with reactive or basic organizations.
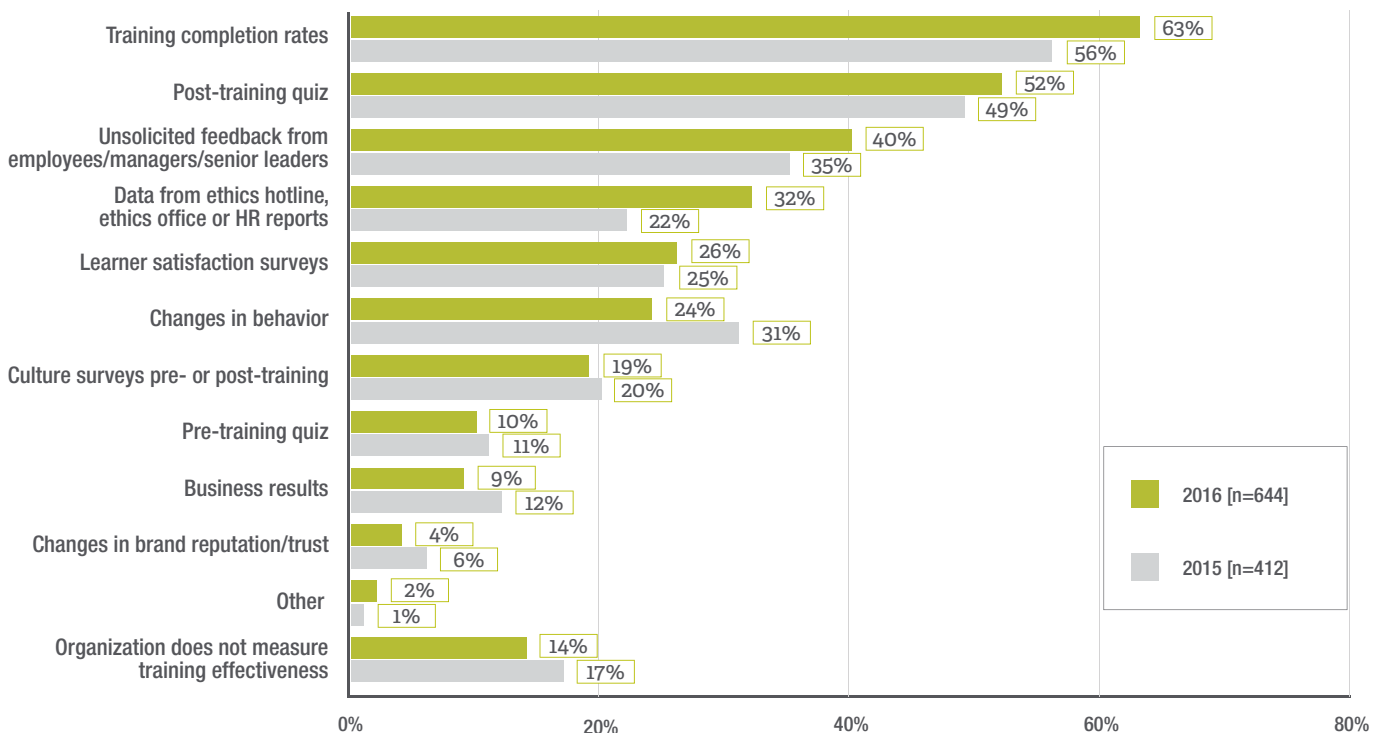
Analysis: Measuring training effectiveness remains an important trend. Currently, 14 percent

of organizations do not attempt to measure training effectiveness in any way. Program maturity correlates with the use of multiple metrics, which can result in more accurate findings.

Organizations increasingly rely on training completion rates (63 percent) to measure effectiveness, however. While readily available, this information is not a measure of the effectiveness of the training; 52 percent of organizations use post-training quizzes, a better tool to measure effectiveness.

Improved effectiveness measurement will uncover gaps in learning and will likely reveal that a very significant percentage of organizations are providing employees with training that is not engaging or effective. The information will also enable organizations to select better training tools and methods, use seat time more effectively and be better stewards of their budgets.

How do you measure training effectiveness?

	2016 [n=644]	2015 [n=412]
Training completion rates	63%	56%
Post-training quiz	52%	49%
Unsolicited feedback from employees/managers/senior leaders	40%	35%
Data from ethics hotline, ethics office or HR reports	32%	22%
Learner satisfaction surveys	26%	25%
Changes in behavior	24%	31%
Culture surveys pre- or post-training	19%	20%
Pre-training quiz	10%	11%
Business results	9%	12%
Changes in brand reputation/trust	4%	6%
Other	2%	1%
Organization does not measure training effectiveness	14%	17%

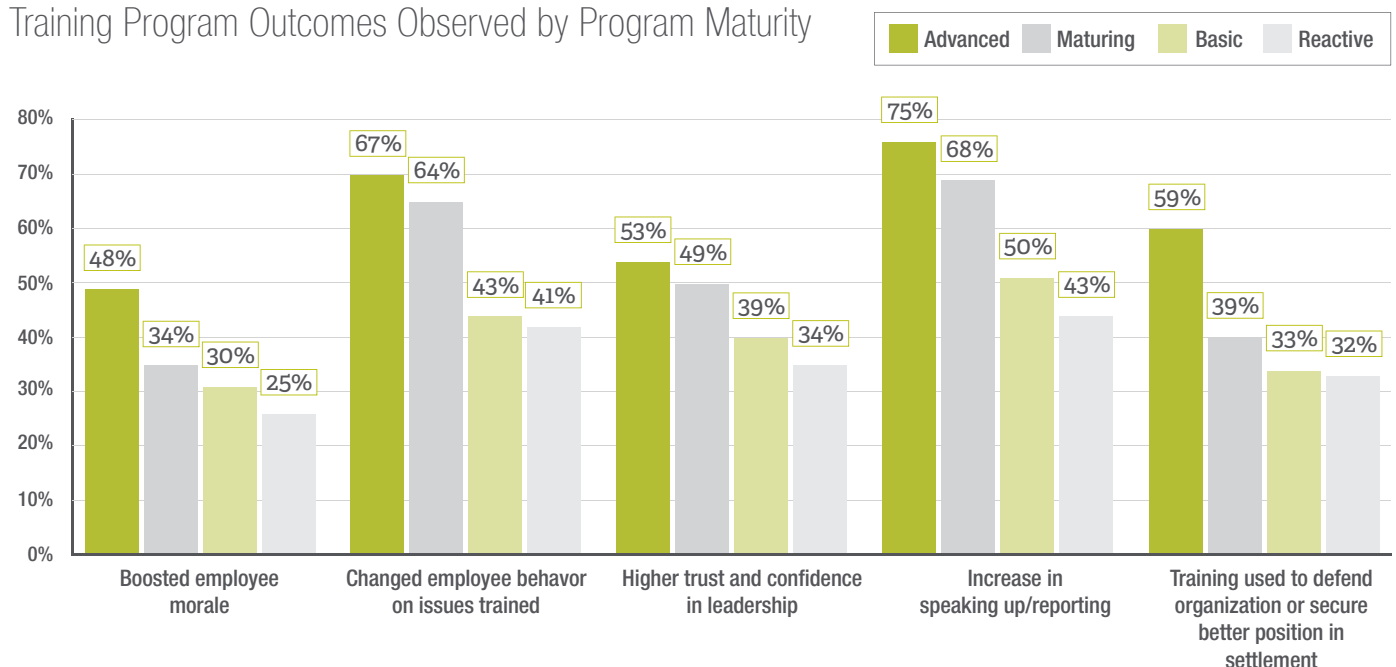# What are the compliance training program outcomes?

Findings: Our findings show that those organizations with more-advanced training programs see more improvement in outcomes than those with less advanced programs.

» Across key outcome criteria aligned to program objectives—creating a culture of ethics and respect, complying with laws and regulations and improving employee understanding of compliance objectives—those organizations with advanced programs reported better outcomes.

» There is statistical significance in the program performance differences across the five outcome criteria cited below. For example, on the key metric of delivering an outcome of a speak-up and reporting culture, 75 percent of those with advanced programs reported improvement, compared with 43 percent of those with reactive programs.

Analysis: There is an undeniable link between the maturity of a training program and the strength of the desired results that are reported. Advanced and maturing programs see far better results on key indicators such as increased employee morale, positive behavior change, trust in leaders, increase in speaking up and use of training as a defense to help protect the organization. On each of these indicators, basic or reactive programs perform notably worse—with a gap with maturing and advanced programs of as much as 19 to 32 percentage points.

They key to success for the maturing and advanced programs is not solely linked to the total dollars available or FTEs dedicated to the programs. Rather, those organizations that are focused on program improvements (such as education planning, risk-based training and more-accurate effectiveness measures) at higher rates report significantly stronger program outcomes. These program behaviors are at the heart of program success.

Training Program Outcomes Observed by Program Maturity

Legend: Advanced | Maturing | Basic | Reactive

Chart data:

Outcome	Advanced	Maturing	Basic	Reactive
Boosted employee morale	48%	34%	30%	25%
Changed employee behavior on issues trained	67%	64%	43%	41%
Higher trust and confidence in leadership	53%	49%	39%	34%
Increase in speaking up/reporting	75%	68%	50%	43%
Training used to defend organization or secure better position in settlement	59%	39%	33%	32%

Conclusions

Ethics and compliance training is one of the most important elements of an effective compliance program. Done properly and executed with excellence, a training program can help reduce risk, improve culture and employee morale, change behaviors and drive desired compliance behaviors such as speaking up. But executing a program at this level takes structure, commitment and analysis. Advanced and maturing programs are seeing many of these rewards at much higher rates than programs that are basic and reactive.

To successfully overcome the challenges that lay ahead (doing more with less, modernizing training programs, covering more risk areas and improving the quality of content), organizations must strive to advance their training programs. More structured programs with a dedicated budget, multiyear education plans, true effectiveness measures, workflow improvements and a mix of high-quality training options will be the hallmarks of the most successful programs.

Key Takeaways

» **Keep key objectives front and center.** Keep key objectives and program goals in mind when making decisions about what courses and assets to build or purchase. As you make important decisions, ask yourself whether the decisions will advance your ultimate program goals and objectives. If your objective is truly to change culture, ensure that training is high quality and effective and sets the right tone. Overly legalistic, check-the-box training (no matter how cost-effective) will undermine culture change efforts and will likely generate more employee cynicism.

» **Ensure a dedicated budget for training.** Secure a budget—and earmark it for your training program. Programs with a dedicated budget perform better overall.

» **Focus on maturing your program.** The connection between maturity level and program results is strong. The path to reach the advanced program state can seem daunting, but the results are worth the effort. Focus on maturing your program each year.

» **Make education planning a priority.** Make education planning a central activity in your E&C training program. All organizations regardless of size benefit from adopting this practice. The plan should reflect all of your educational offerings and provide a clear roadmap of what topics will be covered and when training assets will be deployed. Update the plan regularly. Organizations that use education plans have more-effective programs and better control over budget.

» **Consider risk-based training assignments.** Use risk-based training assignments to improve effectiveness and efficiency. By targeting training topics to certain audiences, an organization can drive effectiveness and reduce the overall training burden on its learner base.

» **Use effectiveness measures to drive program improvements.** Measuring effectiveness of training is essential to maturing your training program; measurement can help guide product decisions and deployment plans. Determine the metrics you want to use to measure effectiveness; don't forget to include data points that are already collected in your organization (such as hotline and reporting data). Establish a regular schedule for evaluating program effectiveness.

» **Train your Board of directors properly.**
Board training remains a vulnerability for many organizations. Only 58 percent of organizations provide training to their Board members, and among those organizations training is still limited. The remainder are failing to provide directors with information necessary to exercise proper oversight of the compliance program. When training is deployed, consider the core competencies that should be covered and ensure that you are providing timely education to each new director who joins your Board.

MODERNIZE YOUR PROGRAM NOW.

Although there are many pressing challenges facing organizations—and many of these challenges consist of basic blocking and tackling—it is important to focus now on modernizing your E&C training program. Millennials will represent 50 percent of the workforce by 2020, and the environments of many organizations are already being influenced by this next wave of employees. To have the greatest impact and make a lasting impression, focus on the way that information is communicated, the context around what is being said, the tools that are required to effectively deliver your message and the quality of the assets that are deployed. Innovating now will provide immediate benefits for all your learners.

ABOUT NAVEX GLOBAL'S
ETHICS & COMPLIANCE TRAINING

NAVEXEngage™, NAVEX Global's ethics and compliance training solution, is built on decades of experience in the compliance, conduct, employment law and information security training marketplace. We offer:

» Online training courses that feature multiple formats, lengths, means of access and audience targets

» Courseware content that is relevant, global, legally vetted and engaging

» In-person training designed for your organization and delivered by our advisory and training teams, who have decades of compliance industry experience and many years of consulting on training topics that matter to you, your leadership and your Board of directors

» Learning management technology and flexible course delivery options to meet the training, reporting, certification and management needs of organizations of all sizes and complexities

» Risk assessment, culture assessments and multiyear training-program development that helps organizations ensure that their training program is tightly aligned to their organizational risks and objectives

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

ADDITIONAL ETHICS & COMPLIANCE TRAINING PROGRAM RESOURCES

NAVEX Global also offers many valuable resources related to improving your ethics and compliance training strategies. 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

» Online Training Courseware Catalog
www.navexglobal.com/en-us/resources/online-training-courseware-catalog

» By the Numbers: Making the Business Case for Employee Compliance Training
www.navexglobal.com/en-us/resources/numbers-making-business-case-employee-compliance-training

» Mandatory Training Laws Overview
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Vice President, Online Learning Content, NAVEX Global

Ingrid Fredeen, JD, NAVEX Global's vice president of online-learning content, has been specializing in ethics and legal compliance training with NAVEX for more than 10 years. She is the principal design and content developer for NAVEX Global's online training course initiatives, using her more than 20 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 company.

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