# Who needs this training?

Wait! Before you answer this question, take a step back. Make sure your content is focused on the right things: a risky activity and the specific behaviors that will avoid issues and keep your org out of trouble.

By training on an activity instead of a generic risk topic, it'll be more useful and effective. Let's start from the top...



## Identify the activity that creates risk

What specific situations, processes, tasks, or choices could lead to noncompliance *(e.g., handling customer data, interacting with third parties, processing financial transactions, traveling abroad)*?

Which risks does this activity introduce *(e.g., privacy, cybersecurity, anticorruption, IP)*? Make sure these are covered in the training.

**Pro tip:** Look at audit reports and your helpline data to spot compliance gaps. But before defaulting to training, see if internal controls can make compliance easier.

## Figure out who's involved in this activity

Which departments, teams, or roles have:

- access to information or systems related to this activity *(e.g., finance, IT, salespeople, p-card holders)*?
- decision-making authority *(e.g., approving vendor contracts, accepting gifts, authorizing data access)*?
- past violations, concerns raised, or near misses related to this activity?

**Pro tip:** Chat with risk owners, managers, and other team members about their understanding of the risks and how confident they feel about current protocols. You'll learn who does what and how things work in reality—not just on paper.

## Select who (really) needs this guidance

Use what you learned to create a list of:

- employment roles
- process owners
- people with system access
- anyone required by law

**Pro tip:** To ensure the right people receive training, consult with managers. Ask them to assign or suggest team members who need it based on their responsibilities. Then, review and adjust the list as needed.

## Tailor it to their needs

- Focus on the weak spots where mistakes can happen, instead of explaining the law or regulation
- Make it practical by telling them the specific actions you want them to take
- Train them through meetings, collaboration tools, systems, and other ways they already interact with each other

**Let's partner to tackle this together!**

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