The Broadcat Guide to Leader-Led Compliance Training

How to build culture, get operational, and make training your leaders will love



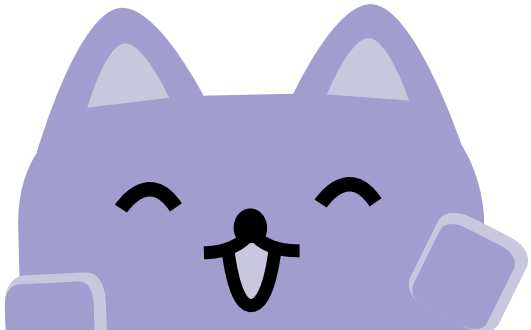
This guide was written by Broadcat

We are a compliance design company, and our team has former in-house compliance program officers and managers on staff—as well as amazing graphic designers who either have or, at the time we're writing this sentence, are busy studying for their Certified Compliance and Ethics Professional exam.

So, we feel your pain.

We know how much you want to make compliance part of your company's culture, taking it from something "the compliance team does" to just a part of how work gets done—and we use design to help make that happen for our customers.

You can learn more about what we do at **thebroadcat.com**





Me, when I was in-house compliance, after discussing leader-led training with other compliance team members

If you're reading this, you heard "leader-led compliance training" and thought "yes, that sounds like a good idea, but how?"

Because, of course, that's what this guide answers.

In this short guide, we'll lay out how leader-led compliance training complements your e-learning and compliance-led efforts with its unique strengths, and then dig into how that insight leads us to a very specific vision for what leader-led training should look like.

And then, we'll walk through how to execute that vision. We'll lay out what you need to create, from big-picture planning to the ultra-granular task of writing a great cover email—the kind that your leaders will actually open. And because we're Broadcat, we'll dissect illustrated examples to make it easy to understand how to pull this off.

Now, one quick thing before we dive in: don't get hung up on the phrase "leader-led training." What we describe in this guide could be led by Ethics Ambassadors, or an ombuds network, or some other group of business-side employees, and you could characterize it as training or communications or discussion touchpoints; it'll work the same in any of those cases. We just had to call it something for the sake of simplicity.

Good to go? Then let's start off with why this matters in the first place.

Why should we do this?

Don’t skip this section.

Even if you’re already on board with leader-led training, or if someone tasked you with it and you’ve just got to get it done, read this first.

Why? Because while leader-led training can be hugely impactful, it can also be a bunch of compliance spam that your leaders aggressively delete.

The difference comes from staying focused on what makes leader-led training unique, so you’re adding value instead of just duplicating what you’re already doing via e-learning or compliance-led training; basically, you want to use each method for what it’s good at, instead of hoping for a one-size-fits-all tool.

To that end, you should do leader-led training because it is uniquely strong at two big things, which we’ll cover next and then keep coming back to throughout this guide. If these are priorities for you, then read on—and if not, then leader-led training probably isn’t for your company right now.

Strength #1: Getting the business to own compliance culture

If you want your employees to think about, talk about, and prioritize compliance and ethics whether you are there or not—that is, if you want your business to "own" your compliance culture—then your employees need to be driving that conversation among themselves. As long as the message is coming from the compliance team, it will be a "compliance" initiative.

Messaging delivered by your leaders or Ethics Ambassadors allows employees to engage face-to-face with someone they already know and trust from the business side, avoiding the directly top-down nature of both e-learning and compliance-led training. It focuses on giving leaders practical tools that help their day-to-day work and then turns the discussion over to them.

Strength #2: Encouraging operationalization

Leader-led training is also the path to operationalization—the practice of having compliance and ethics be inserted directly into business process and operations so there is no distinction between "compliance" and "work."

To be clear, leader-led training is the *path* to operationalization, not operationalization itself. It's leaders and Ethics Ambassadors driving discussions about compliance and ethics, and that's great, but those conversations are still happening outside of actually doing the work.

But to actually get compliance into your business processes, you need buy-in from the people who own those processes: your leaders. If your leaders don't invite you into how they do their work, compliance will always be a bolt-on corporate initiative.

By providing your leaders with practical tools that help them do their work more compliantly, in their own context, you demonstrate that compliance is a way of doing work—not something separate—and allow them to identify opportunities for integrating it into their day-to-day operational processes.

How leader-led training complements your other efforts

Of course, no training method accomplishes everything. Leader-led training is not going to wipe out the things you are already doing; instead, it complements e-learning and compliance-led efforts, providing unique value in the two areas we just discussed by escaping the limitations of other training methods.

For example:

> E-learning technology is uniquely strong at managing recordkeeping and analytics. Culturally, however, it is something "compliance does," and the length and demands of average e-learning courses make it difficult for leaders to see how compliance guidance could be integrated into business process—that is, if your only experience with "compliance guidance" is a 30-minute module with a quiz, it's hard to see how that could be part of a workflow.
>
> Likewise, compliance-led training is uniquely strong at socializing the compliance team and offering employees real-time feedback from the company's compliance experts. But it is still something "compliance does," and—similar to e-learning—the length of any given live training session makes it hard for leaders to see how compliance guidance can be integrated into their work.

Leader-led training solves these problems. It communicates that compliance and ethics is a topic to be engaged and grappled with as a team, driven by someone employees know in authority (a leader) or a peer who lives the same experience as them (an Ethics Ambassador)—and it distributes the workload so it's not subject to the limitations of your compliance team's bandwidth. And when the content for leader training is done well, it paves the road for compliance to become more and more a part of how the company does business.

Of course, this requires that you do leader-led training, and especially create resources for it, in a very specific way. That's what we'll cover next.



E-learning
Recordkeeping
Analytics



Compliance-led
Socialize compliance team
Real-time expert feedback



Leader-led
Business ownership of culture
Encourage operationalization

How do we do it?

So far, we've framed up how leader-led training complements e-learning and compliance-led training by focusing on two areas where leader-led training is strong:

(1) business ownership of culture
(2) encouraging operationalization

To realize that, we need to make sure we are doing leader-led training in a way that leans into those strengths, because if we simply duplicate what we're doing through other methods then we're just going to annoy our colleagues and employees and hurt our credibility. That means we need to focus on providing practical, job-focused things to discuss, and to make it absurdly easy for them to hold those conversations.

To that end, the rest of this guide lays out what you need to do and a way to get it done. Big-picture, you'll need three things:

A plan for your leader-led training touchpoints
A simple, easy-to-use package for each touchpoint
A rollout plan

Let's break these down.

A plan for your leader-led training touchpoints

The first thing you'll need is a plan—a basic roadmap of the leader-led training touchpoints that you're planning to cover over a given period of time.

Why you need a plan

Having a plan requires you to have some strategy behind what you're doing, so that you're keying it into company risks and operations to demonstrate value. It also helps you to plan for the amount of work that goes into something like this. Doing this well—such that it starts becoming "how we do things here"—requires consistency, and bailing after two months on this because work got too busy will demolish any progress you've made.

That said, don't over-plan, and don't spend so much time planning that you never actually do anything. We'd recommend a one-year plan; that's a good balance between committing to enough time to see if it's working and not over-planning.

Monthly touchpoints are probably your best bet

Within your one-year plan, we recommend shooting for one leader-led touchpoint per month. Doing it more frequently is almost certainly going to be overwhelming, both for you—in the amount of content you'll need to create—and for your leaders.

On the other hand, doing it less frequently probably isn't going to encourage the type of discussion and transfer of ownership that you want. That's because you should assume that most leaders are going to forget or miss doing this at least once per year. If you have one touchpoint per month, that's probably fine; stuff happens. If you're doing it once per quarter, however, then that team is going *six months* without any leader-led touchpoint, and they're very unlikely to make it a regular practice (or even remember that it's something they're supposed to do).

One touchpoint per month allows for leaders to miss a session without scuttling the entire thing, enabling you to make this a regular practice without it being overwhelming.

How to pick the topics you cover

OK: to get started, you need to plan out 12 touchpoints for your leaders. What should you cover?

The lame lawyer answer is "it depends," but it's also true: the topics you choose depends on where things are with your program.

For example, if you're just getting started with compliance, or rebooting a program after a merger or spinoff, you may want to do at least a little bit of compliance basics. That will help socialize your program while getting people in the habit of doing this type of monthly communication.

That could look like something like the plan we've put over on the right, which we assembled using some of **our job aids**.

Note that even though we're covering "program basics" here, each individual topic is ultra-specific and just one page, and the pieces tend to look like flowcharts and checklists—we'll get into that more in the next section when we talk about crafting the monthly package.

If you're more advanced, or if your company is just more process-oriented already, you might want to focus on just a specific risk or business process. Let's take a look at that next.



Basic Code of Conduct Obligations Infographic

Introduces basic employee obligations across common Code of Conduct areas, framed around business tasks



Legal and Compliance

List that provides examples of which department handles which kinds of issues, so your employees know who to contact



What Happens When I Contact the Helpline?

Guide that walks employees through your helpline reporting process to help them understand what to expect



Cooperating With Internal Investigations

Guide to help employees understand expectations when participating in an internal investigation



Is it OK To Do _____ at Work?

Flowchart to help employees determine if a particular action is appropriate workplace behavior



Social Media Checklist

Checklist to help your employees post appropriately on social media



Stuck With a Tough Decision?

Flowchart to help your employees make ethical decisions



When Should You Raise a Compliance Issue?

Guide to help employees decide when to report an issue to compliance and when/how to involve their leader



We Do Not Tolerate Retaliation

Guide to help your employees understand what retaliation is, reinforce the non-retaliation message, and encourage reporting



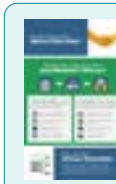
Conflicts of Interest

Guide to help employees understand what a conflict is and how to disclose it



Is It Confidential?

Flowchart to help employees determine if information is confidential



Hiring a New Service Provider?

Guide to help identify government-facing third parties and remind employees that special procedures apply

For example, if you wanted to focus on business processes that impacted your anti-corruption risk, you could do something like the example you'll see on the right, which we've put together using a different set of **our job aids**.

Again, check out the specificity: these hyper-targeted, how-to job aids are intended to complement what you're doing via e-learning and compliance-led training. The goal isn't to give your employees an overview of the entire risk or make them think like a compliance officer, but to give them practical job aids that will help them mitigate that risk in meaningful ways.

At this point—the planning stage—all this means is that when you're scoping out what you want to cover, less is more. Don't try to cover everything.

Instead, just focus on giving specific, useful examples of how compliance intersects with business process, with the goal of having your leaders pick up the baton and invite you deeper into their process.

Now, this is a little easier to grasp by looking at what a "specific, useful" touchpoint actually is. So, let's tackle that next.



Who's a Government Official?

Guide to assist employees in identifying government officials



Is This Person a Government Official?

Flowchart to help determine whether a person is a government official



Give This, Not That (Pre-approval version)

Helps employees understand common types of gifts and entertainment that are acceptable, those that require pre-approval, and those that are never acceptable



This Looks Like Building a Relationship—But This Looks Like a Bribe

Guide to help employees understand the difference between legitimate and extravagant entertainment and guidance for making judgment calls



Can They Accept It?

Flowchart to help employees determine whether they can provide a business courtesy under their intended recipient's policy



Hiring a New Service Provider?

Guide to help identify government-facing third parties and remind employees that special procedures apply



Contract Execution Checklist

Checklist to ensure that employees involve the right people and run the right processes before signing an agreement



Managing a Third Party?

Checklist to help your business partners handle day to day communications and identify red flags of inappropriate behavior



Invoice Red Flag Checklist

Checklist that walks employees through what to look for in various parts of an invoice before approving, including escalation details



Travel & Expense Red Flag Checklist

Checklist that walks employees through what to look for in various parts of a travel & expense report before approving, including escalation details



Is Your Third Party Expensing Something Unusual?

Guide to help employees identify third party expenses that require heightened scrutiny by your compliance team



You've Been Asked to Pay a Bribe: Here's What To Do

Flowchart to help train front-line employees on what to do when they are confronted with a bribe—from assessing the situation to de-escalation and next steps

A simple, easy-to-use package for each touchpoint

Now that you have a plan for all of your leader-led training touchpoints, you actually have to make the content for each touchpoint. (Duh.)

And again, to achieve our goals of getting our business to own compliance culture and encourage operationalization, we want to give them practical, job-focused things to discuss, and to make it absurdly easy for them to hold those conversations.

That means there are three things you need to prepare for each monthly package.

The job aid

This is the substantive guidance for your leaders and employees, presented as a specific, practical job aid intended for long-term use. The goal here is to provide leaders with something that is quick to consume but will get used over and over again as a resource; basically, a one-pager that helps them solve a specific problem. This allows you to get targeted, high-impact guidance to your employees that encourages discussion and showcases how compliance impacts business operations—without incurring compliance fatigue.

The talking points

This is a short guide that helps leaders deliver the job aid. It doesn't repeat what's in the job aid, but instead explains its relevance and use. That makes it easy for leaders to frame up the discussion, instead of saying "here's this thing from compliance." It should be drafted in a way that allows for leaders to use it as talking points, cut-and-pasted into an email, or both.

The cover email

Finally, this is how you get the job aid and talking points to your leaders. This may feel like a little thing, but drafting this well is key—it doesn't matter how great your job aid and talking points are if your leaders don't actually open the email that contains them.

Let's break these down in detail—and since it's easier to show than tell here, we'll do it by dissecting an example of each.

The job aid

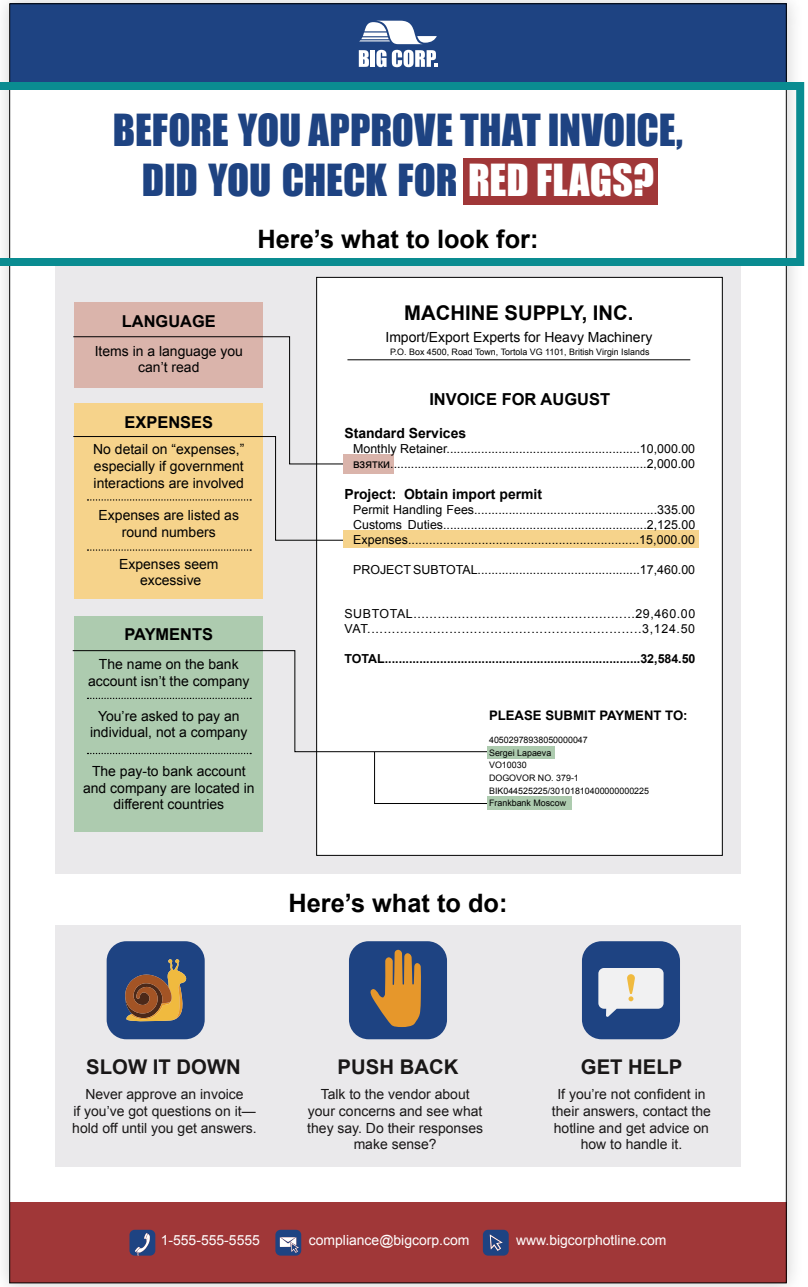
A “job aid,” as we’re using it here, is a highly-targeted, business-friendly document in a format that will look and feel more like a business operations guide than traditional compliance training.

To make a good one, here are three things to do.

Solve a specific problem

Job aids should solve specific problems or answer specific questions; that’s what the name “job aid” implies, after all. So leave higher-level risk concepts, scenarios, and case studies for your other training methods—for this, get really, really specific.

Your job aids should have a clear, obvious use to your leaders from the way they are framed—that is, your leaders shouldn’t have to do any work to figure out how to use them. Whenever possible, do this by framing them around a job duty instead of a risk; in this example, we’ve put anti-fraud and anti-corruption guidance in the context of invoice approval.



Be action-oriented

A job aid is intended to be used real-time. Instead of asking employees to learn or memorize the message, you're giving them a tool that lays out what to do in a specific context, so that they can refer back to it when they need it.

Practically, this means that a good job aid often looks like a checklist, a flowchart/decision tree, or some other chart that clearly lays out what to do and when; the more specific the job aid, the easier this is to do. In this example, we're giving employees a visualized checklist of red flags, with clear next steps and contact details to make the entire piece self-contained.

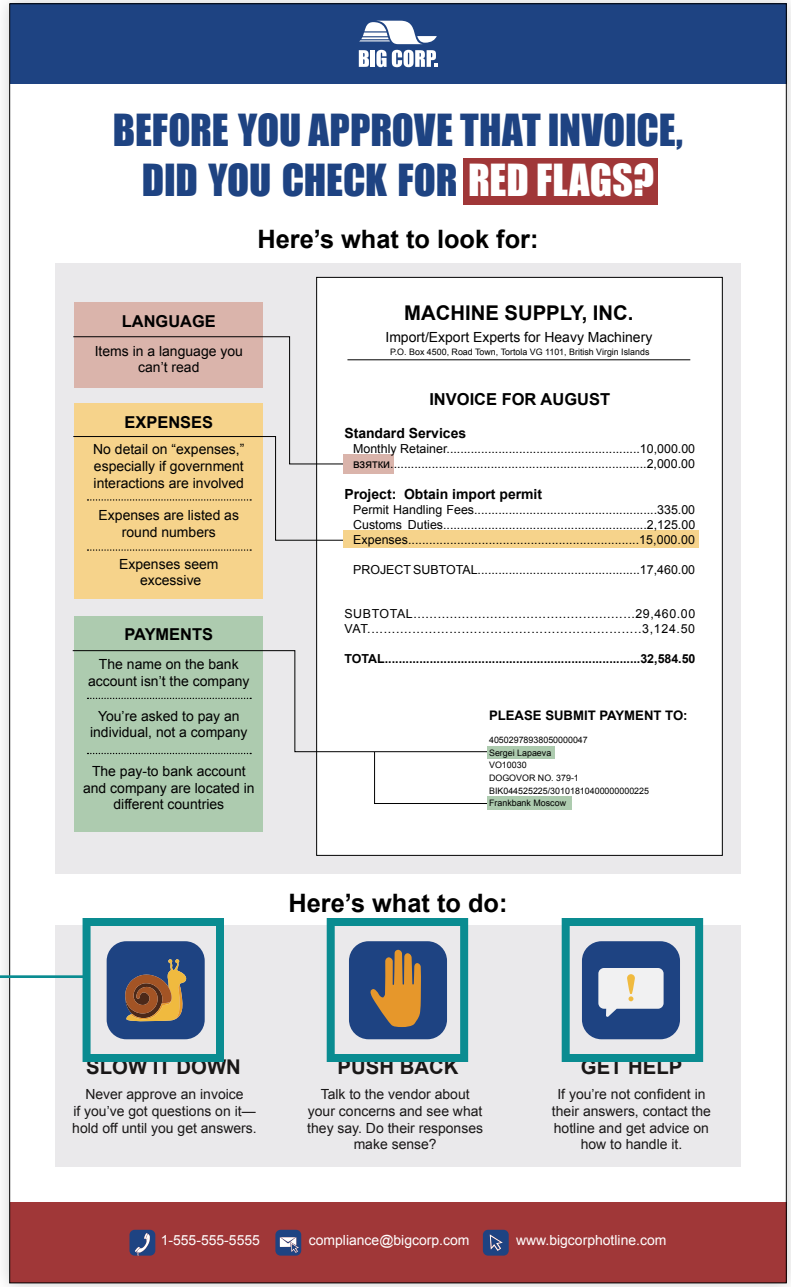


Keep it lightweight

Finally, because a job aid is intended to be used as a real-time reference tool that people come back to over and over again, it has to feel lightweight in both substance and format.

Substantively, you accomplish this by solving a specific problem, which is how you can keep it short and direct; if you're working on a job aid and feel like it's getting too long, you're probably trying to accomplish too much. Go narrower and it'll be easier and more useful.

In terms of format, you do this by preferring utility and simplicity over technology and media (remember, this isn't e-learning). In this example, our job aid prints on a single piece of paper to allow for both on- and offline use, so it can live on an intranet or mobile app just as easily as it can be hung up in someone's cubicle. Similarly, it uses illustrations instead of photos or videos to keep the file size small, so there are no bandwidth requirements that can limit an employee's ability to access it, nor any technical issues that can trip up leaders trying to present it to their teams.



The talking points

Next, each job aid should be supported by a set of talking points that helps your leaders put the job aid in context and start the discussion. To simplify things for leaders, we recommend using a consistent format as much as possible—and here's what to cover.

What it is

Start with a sentence or two that frames up the job aid; if you've created a good job aid, this should be fairly straightforward. This is to simply give leaders a smoother, punchier way to start the conversation than "here's this thing from compliance."

Talking Points
Invoice Red Flags

What it is
This time, we're talking about how to review invoices we get from vendors, suppliers, service providers, and so on—anything where someone has asked us to pay them money for a product or service. We're going to explain why this matters and give you a tool to use to make sure that our money is going to the right people for the right things.

Why this matters
This is important for two big reasons.

First, stewardship: money we spend on behalf of the company has to go to the right people for the right reasons. If you have the authority to spend money or review an invoice, the company is trusting you to know where that money is going. Reviewing invoices for red flags is one way you do that.

Second, this is one way we help prevent bribery, fraud, and money laundering. That is, no one is going to come out and tell you that they are stealing from us or using our funds for illegal purposes. It will be concealed in a transaction that looks normal, and in certain circumstances we can be responsible for their bad actions. And while we can't know everything, we do have to be able to say that we acted like reasonable people and checked before we approved something for payment.

What to do
We're giving you a handout that walks through what kinds of things you need to look for before approving an invoice. These are pretty simple things to review, because we're not expecting you to be forensic auditors; we are simply expecting you to review invoices critically and thoughtfully, and only approve them when you're willing to stand by your approval.

To that end, this handout doesn't list every single problem with an invoice. Instead, it helps illustrate the theme: don't approve something if it's unclear, suspicious, or you can't read it. And if you do see something that you can't stand behind, here's what to do.

First, slow down. If you approve it, you own it, so don't be in a rush.

Second, go back to the vendor and ask for more information. In many cases you just need them to be more clear and re-issue the invoice.

Finally, if you're not comfortable with the vendor's response, call the Compliance team. They can step in and help when we have tough cases.

And that's it: keep this handy and review it before approving your next invoice. Questions?

Why this matters

Next, give your leaders some details on why they're being given the piece. If you want to do a tie-in to your values, this is the place to do it; we've done that in our example with a tie-in to stewardship. Keep your values tie-in short and direct, and fight the temptation to get overly flowery with aspirational language—it should sound like a person who believes what they're saying, not corporate PR boilerplate.

If your job aid is framed around a business process, this is also your opportunity to flag which risks it implicates (in this example, bribery, fraud, and money laundering). That will help your employees make the connection between your more concept-focused trainings and their day-to-day work.

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What to do

Finally, give your leaders concrete direction to pass on to their team—beyond "read this thing." Don't repeat what's in the job aid, but instead summarize how it's supposed to be used and what their next steps should be.

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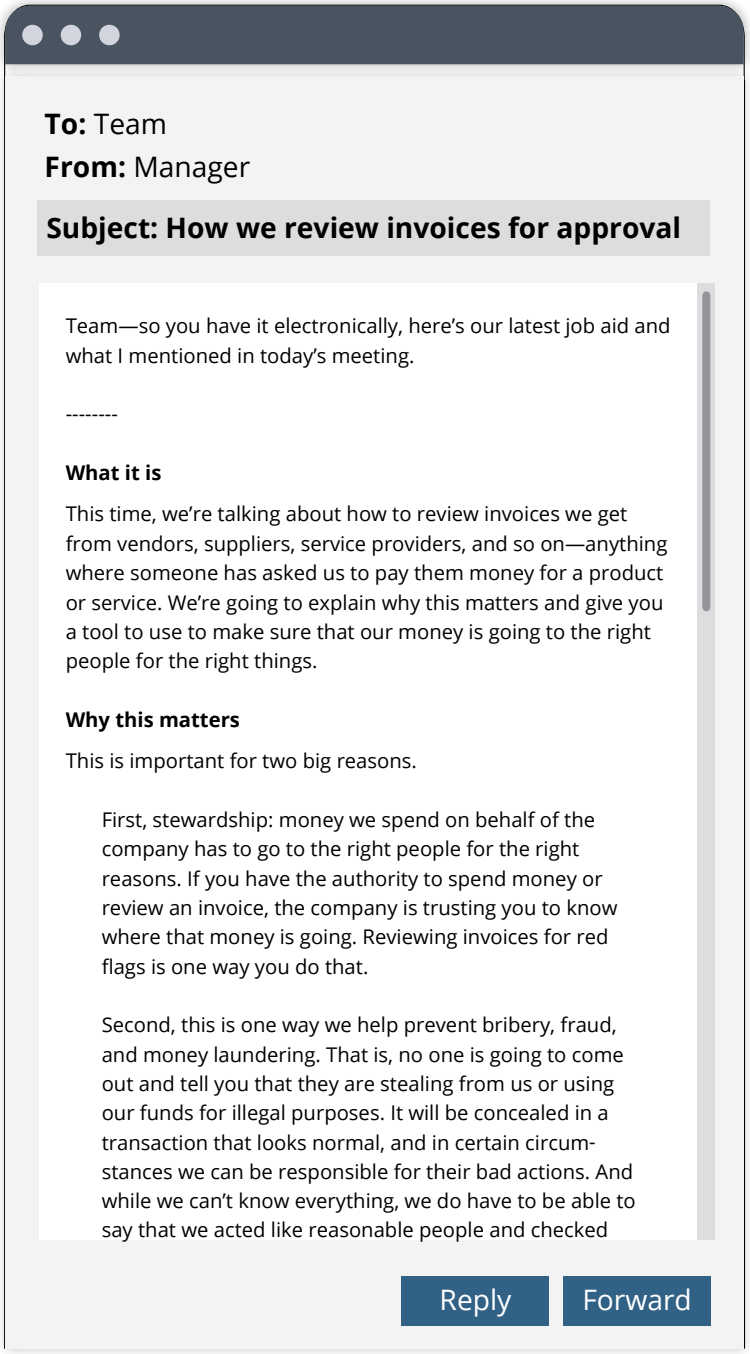
In addition to the substantive structure, note two other things about this talking points example.

It can work as an email

Most leaders won't read this to their team word-for-word—and they shouldn't, because that's awkward. The reason it's written this way is to allow leaders to cut-and-paste the text into an email to their team with little-to-no edits, allowing them to distribute the touchpoint when they don't have a chance to discuss in person, or (even better) to use as a follow-up to the in-person meeting that documents that it happened.

It's pretty short

Our example is just over 400 words. A "conversational" rate of speaking is about 120-150 words per minute, so even if this was read word-for-word, it'd take around 3 minutes—and we'd expect most leaders to summarize it in a shorter way. Keep it at this length or shorter, as this makes the request for team time much more reasonable and achievable for your leaders or Ethics Ambassadors.



The email

Finally, you'll need to actually get the job aid and talking points to your leaders with a cover email. If the job aid and talking points are the product, the cover email is how you market each piece to your leaders. Here's what makes up a great cover email.

A simple, direct subject

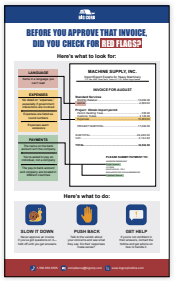
As much as possible, have your subject line tell your leaders what's inside—and more importantly, what they'll learn, answering "what's in it for me." Once you have traction with your leaders, you can preface the subject with "Leader-led training" or something else that describes the program at your company, but start with being as simple and direct as humanly possible.

To: Managers
From: Compliance Team
Subject: How to review invoices for red flags

Hi team,

Like all businesses, we rely on suppliers and service providers. And since they need to be paid, that means we have invoices to review.

This is normal, but it's also risky. All kinds of nasty things can be buried in an invoice, and that means we need to review them carefully before approving. Today, we're giving you a tool that will help your team do exactly that.



Take 5-10 minutes to walk through this with your team. You'll set up why this matters, give them a tool that explains what they need to check, and then explain how to handle a situation that isn't quite right.

The tool and talking points are attached; if you can't get meeting time this month, you can cut-and-paste the talking points into an email to your team.

Let me know if you or your team have any questions. We're here to help!

- The Compliance Team

Reply Forward

Framing copy

Start off the email itself with a few framing sentences that tee up the subject matter. Less is more here; the goal is to explain why they're getting this particular job aid, not repeat what's in the job aid itself.

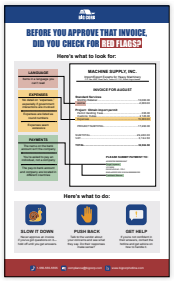
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Reply Forward

A preview image

Next, cut-and-paste the job aid in here: drag-and-drop it in, or just use the "snip" tool on your computer. Why? Because—and we say this with love—compliance documents do not have a great reputation for being user-friendly. Your leaders are most likely expecting a complicated form or long PowerPoint, but you've created a lightweight, easy-to-use job aid; this is the time to show rather than tell so that your attachment actually gets opened.

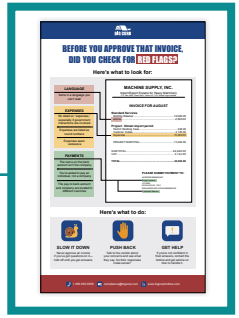
To: Managers
From: Compliance Team

Subject: How to review invoices for red flags

Hi team,

Like all businesses, we rely on suppliers and service providers. And since they need to be paid, that means we have invoices to review.

This is normal, but it's also risky. All kinds of nasty things can be buried in an invoice, and that means we need to review them carefully before approving. Today, we're giving you a tool that will help your team do exactly that.



Take 5-10 minutes to walk through this with your team. You'll set up why this matters, give them a tool that explains what they need to check, and then explain how to handle a situation that isn't quite right.

The tool and talking points are attached; if you can't get meeting time this month, you can cut-and-paste the talking points into an email to your team.

Let me know if you or your team have any questions. We're here to help!

- The Compliance Team

Reply Forward

A clear call-to-action

Finally, close with a call-to-action (marketing-speak for "do this thing"). This section shouldn't change much, if at all, from email to email; the point is to simply and clearly explain "here's what to do" so your leaders know that something is required of them. You can write this section once and use it over and over.

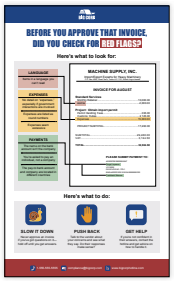
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A rollout plan

You've got a plan and you've developed your monthly packages: the final thing you'll need is a rollout plan.

The basic idea here is that you have to give your leaders a heads-up that this is coming and set expectations; it's basic relationship management stuff, and the more respect you show your leaders by giving them a heads-up, the more they'll want to help you out.

Now, what you do depends on how compliance is positioned at your company: there's an inverse relationship between how much you have a seat at the table and how much you need to socialize things. For most folks, this should work:

> First, get your business-friendliest touchpoint package ready to go—the job aid, the talking points, and the cover email that you're the most proud of. Put them all in a single PowerPoint or PDF.
>
> Next, have your CCO give your senior leaders a heads-up, showing them (either live, or by attachment) the sample package so they can see the business value and get how easy it will be to use. Remember, they're probably going to assume that you're asking their leaders to lead a 30-minute training session with a quiz—that's what they'll expect from the other training they've taken—so your CCO will want to show them this is different.
>
> Finally, give your target leaders a heads-up, emailing them an overview of what to expect. Ideally, this heads-up mimics the format of the actual monthly touchpoint, which will do a lot for setting expectations. For example, if you're doing a monthly package similar to what we've outlined here, we'd recommend you send leaders a one-page infographic that explains what to expect, coupled with talking points to use to explain this to their employees, and delivered with a cover email that follows the format of the other emails they'll receive.

Tip: don't go straight to your target leaders—go to your senior leaders first. If a compliance-hostile leader tries to wiggle out of participating, you want their boss to be aware of the program; you don't want a senior leader finding out you're making a demand of their team's time without telling them first, and it just takes one more email.

And that's pretty much it—not a big deal, but important, and important to plan for. It won't guarantee success, but it'll save a lot of unnecessary work by cutting down on the type of reflexive resistance you get from any new initiative.

Getting started

Congrats!

You made it to the end. And at this point, you're probably thinking "this seems like a lot of work."

And *of course it is*, because getting your business to own compliance culture and promoting operationalization are big, important goals—and if those were easy things to get done, there wouldn't be a compliance profession! So yes, it's a lot of work, but it's worth it.

Now, if you're thinking "we could do this, but honestly it would be great if someone else made all this for us, so we can focus on face-to-face interactions," then hey, we have good news for you: that's exactly what we did.

Broadcat's Compliance Design Club is where you'll find all this great stuff; you can pick from dozens and dozens of job aids to build an annual plan, and get them bundled with talking points and an email, and we can even help you with customization to your branding, tone, and risks. All of the examples in this guide are available now, and you can learn more about that by visiting **thebroadcat.com**.

Learn more!