Why most compliance training fails

and how to fix it

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Most compliance training is designed to fail.

Most compliance training is designed to fail—because it acts as if "doing training" is itself a good thing.

It's not.

Training is expensive and time-consuming.

And it's risky, too—because most employees will only interact with you through your training. So if your training is out of touch with the reality of how your business actually works, that's how your team will be viewed, too.

Employees won't think of you as a strategic partner; they'll think of you as a cost center that spends money on feel-good initiatives that don't really matter to the business.

When done correctly, compliance training is a tool you use to solve a specific business problem. You identify a business process that has a compliance risk and then you work backward from there, using targeted training to plug that gap in a way that is intertwined with what your business actually does.

But that is not how most compliance training works.

Instead, most training suffers from three problems.

Problem One

It has the wrong goal, confusing academic knowledge with practical outcome.

Problem Two

Because it is framed around the wrong goal, *it gets delivered the wrong way*—as course-based, academic events that live outside of what your business actually does.

Problem Three

Because it gets delivered the wrong way, *it gets measured the wrong way*—focusing on software clicks and knowledge retention instead of business outcomes.

Virtually every compliance program suffers from these problems, and that is true whether it's a scrappy team churning out PowerPoint slides or a decades-old program using the latest and greatest in e-learning technology.

Because these aren't problems of resources or maturity—they're problems of focus.

In this short book, we'll help you identify each problem (and its fix), show you what it looks like to do training correctly, and tell you how we help people do exactly that.

Read on. You'll be glad you did.

PROBLEM ONE

It has the wrong goal

The vast majority of compliance training tries to teach people about risks.

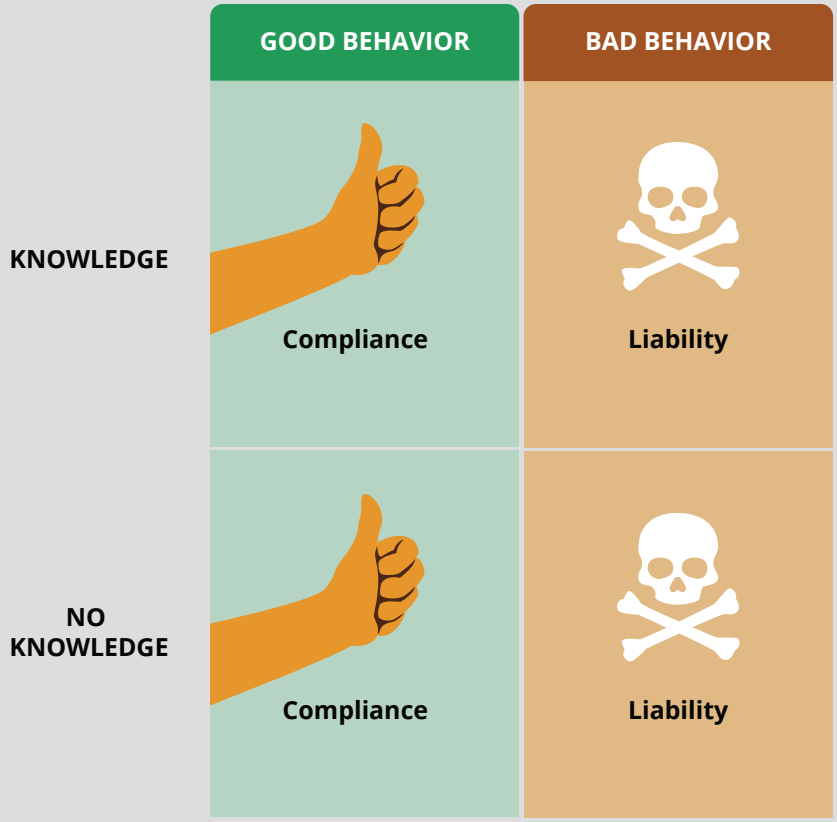
And that is not the right goal. Your goal is not risk awareness; it is compliant behavior. Those things are related, but not the same—and focusing on the wrong one is a big deal.

Focusing on risks treats compliance as an academic exercise, because it primarily teaches people abstract knowledge. And that is true whether the training is a bunch of amateur PowerPoints or the snazziest interactive video e-learning on the market, because you can't fix having the wrong goal by using a different medium.

And the goal of compliance is not academic; it is practical. Your goal is not to turn everyone into a compliance officer—because that's your job. You just need them to do their own jobs compliantly, because that's how your organization makes money—you need salespeople and engineers and whatever.

Put simply, the correct goal isn't knowledge, but compliant behavior—and that means you should frame your training around business processes instead of abstract risks.

Here's why.



The DOJ doesn't give pop quizzes.

To date, the Department of Justice has never raided a facility just to give employees a pop quiz on the FCPA or FCA or whatever other law all the cool consultants are talking about.

That's because regulators care about what your people do, not what they know. If your people are doing the right thing, you get left alone. And that's why your goal is to get your people to do things compliantly, not just know about risk topics.

Of course, those things are related, and ideally you get both. But it's *doing things* that matters.

Because if your employees do the right thing without understanding why, congratulations: you're still compliant.

But if your employees pass all your training quizzes but still miss how that translates to their job duties, you end up across from a prosecutor.

So the goal is compliant behavior, not knowledge.

And although those goals are related, you have to focus on the right one, because knowledge does not necessarily result in compliant behavior.

FWD: Fancy Law Firm FCPA Update for Q4

To: VP_Team@company.com; Audit_Committee@company.com; C_Suite@company.com

From: CCO@company.com

Date: November 1, 2017

new FCPA stuff, you guys take it from here! ;)

Thanks,

Jane Smith
Chief Compliance Officer
Company Co.



Dear Friends,

We hope this email finds you warm and well. In this quarter's FCPA Update, we provide a brief overview of the most recent crop of government enforcement actions, including one or two

SEND

Risk analysis is hard—that's why our profession exists.

That is, if knowledge resulted in compliant behavior, you wouldn't be reading a book about compliance training...or doing compliance training at all.

You would just be forwarding law firm legal updates to your VPs with a note that said "new FCPA stuff, you guys take it from here! ;)"

Actually, you should try that. That sounds fun.

And after that, you can rejoin us in the real world. And in the real world, the act of applying abstract risks to business process is so difficult that there is an entire profession dedicated to owning that skill: the ethics and compliance profession.

You can't assume that telling people about risks will result in compliant behavior, because thinking like that is your skill set, and that skill set is so difficult to learn that we had to create a profession to do it. Asking your employees to learn how to do your job on top of doing sales or accounting or marketing is setting them up to fail.



"Here's something else, Bob: I have eight different bosses."

The problem with abstract, topic-based training is even more obvious when you consider that a lot of job duties involve multiple risks colliding at once. Which means that employees have to remember all those different risks and apply them correctly to do a single thing the right way.

It's like that scene in *Office Space* where Peter complains to the consultants that he has eight different bosses. Except the bosses are your compliance subject matter experts, and Peter is every single one of your employees.

That's because when you train people on risks, here's what they hear:

> *"Oh, you want to approve an invoice? Don't forget your fraud training and anti-corruption training and money laundering training and Code of Conduct training!"*

> *"Oh, you want to make that candidate a job offer? Make sure you click through those modules on anti-corruption and trade compliance and conflicts of interest and competitor information! And don't forget to block out an extra 20 minutes to remember how to log into the LMS, too!"*

This is absolute madness, and it makes total sense why employees hate this type of training.

But there's a better way.

THE RIGHT WAY

Focus on tasks

If you want compliant behavior, train on tasks, not risks. Because that's how people actually think. They think about things they do. And, by happy coincidence, the way they do those things is what actually determines whether you are compliant or not.

So, as a practical matter, stop training on risks—because it is a big waste of resources—and start systematically training people on what they actually do.

Of course, that's a lot of stuff. But you don't have to do it all at once, because not everyone is equally risky, and most things people do aren't risky at all. You simply start with the riskiest thing and then go on to the next one until you hit diminishing returns.

Now, this does require you to know what people actually do. You have to understand how finance and procurement and HR do their jobs. And that might take you out of your comfort zone, but if so: good. You need to get out of your comfort zone.

Because if you're in-house compliance, your job is to know what your businesspeople are doing and make sure it's done compliantly. Everything else you do can be done by a vendor or software and probably cheaper at that—a

risk-based e-learning program could be totally automated and outsourced, especially when you consider that it's not going to accomplish anything anyway.

Your job is to get out there in the business, know what your risky people are doing, and then help those people by training them on how to do those things compliantly.

Now, that raises the question of how you get all that training to people. That's what we cover next.

PROBLEM TWO

It's delivered the wrong way

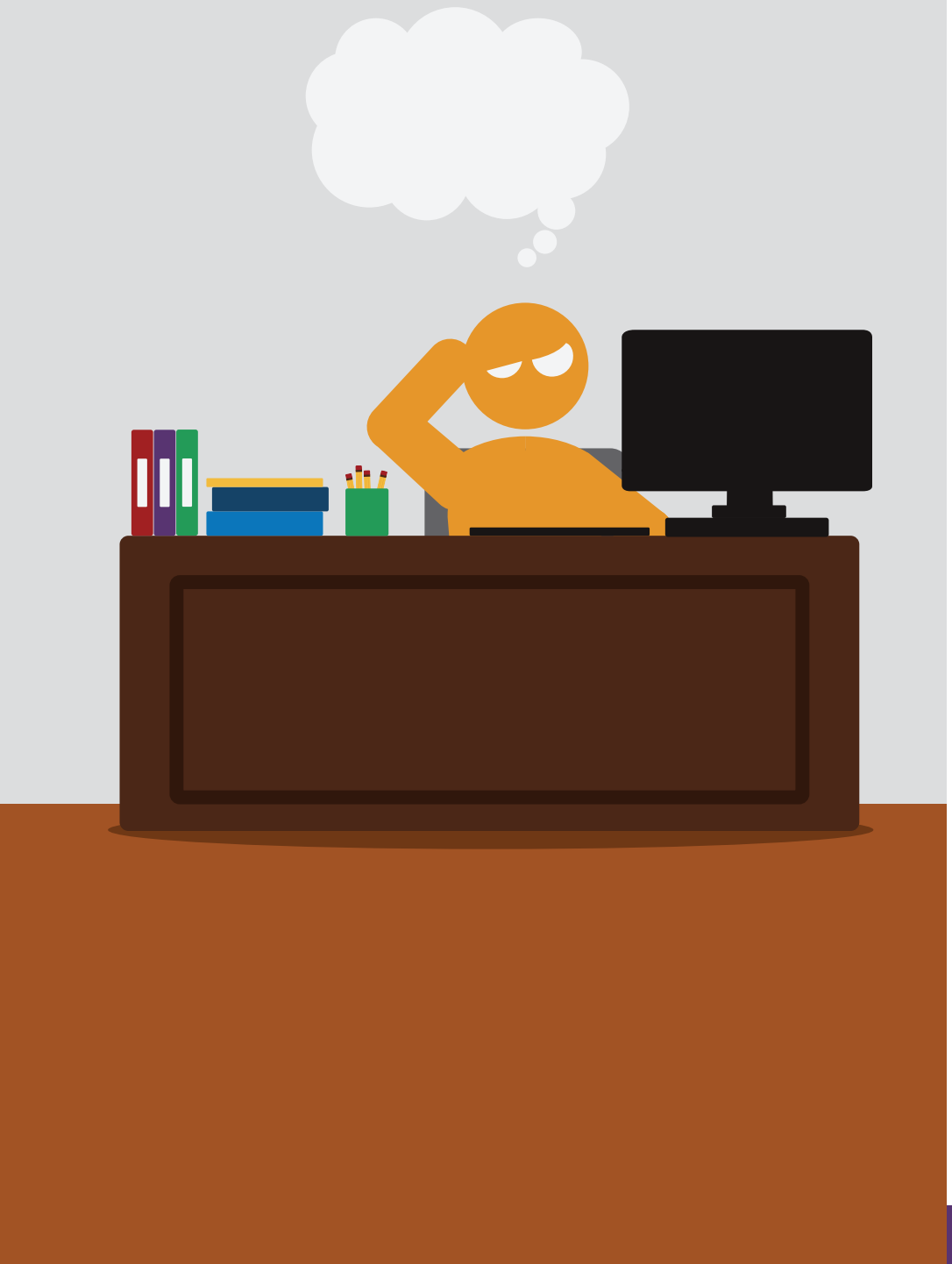
This problem flows from the first one: because compliance training is treated as an academic exercise, it gets delivered that way, too.

That is, compliance training gets delivered as scheduled courses that exist outside of business process. Like "it's year two of our training program, so you get assigned anti-corruption basics and privacy." That sort of thing.

That approach is a problem because it further separates your compliance training from what people actually do, making it harder for them to comply and harder for them to see compliance as part of their job.

And this approach is so ingrained that some compliance people think having a multi-year training program is a mark of program maturity—even though all this actually does is communicate that you are checking a very expensive, very time-consuming box.

Here's why.



Sure, you can't remember it—but we can say you did it!

When you deliver compliance training on a schedule, you are gambling on your employees' abilities to remember the information when they need it—which could be months or years away.

That's a big gamble.

And that's why you see folks get very into quizzes and interactive whatnot; it's to help ensure employees can commit these training courses to long-term memory.

But that misses the point: compliance is an open-book test. You do not get extra credit for memorization, and no one requires you to do that.

The solution to the problem of "can people remember our training" is not to add more quizzes or more training games; it is to sync up your training to your actual business problems so people don't have to memorize stuff in the first place—because it's made available when they need it.

And that, of course, requires more thought than just pumping out e-learning modules every quarter on a three-year cycle. But when you deliver training that way, you are putting more emphasis on being able to say you did training—checking the box—than ensuring that it works, because the very way you are doing it is making it less likely to work.

Yes, you can spend $300,000 and still be checking a box.

Now, if you're delivering a ton of training and spending hundreds of thousands of dollars on e-learning and LMS licensing every year, the idea that this might be considered "check-the-box" can seem offensive.

But it's true.

Because "check-the-box" doesn't mean "minimum effort"—that's just how vendors have been able to redefine it so that you keep buying more junk.

"Check-the-box" just means "doing something for the sake of doing it."

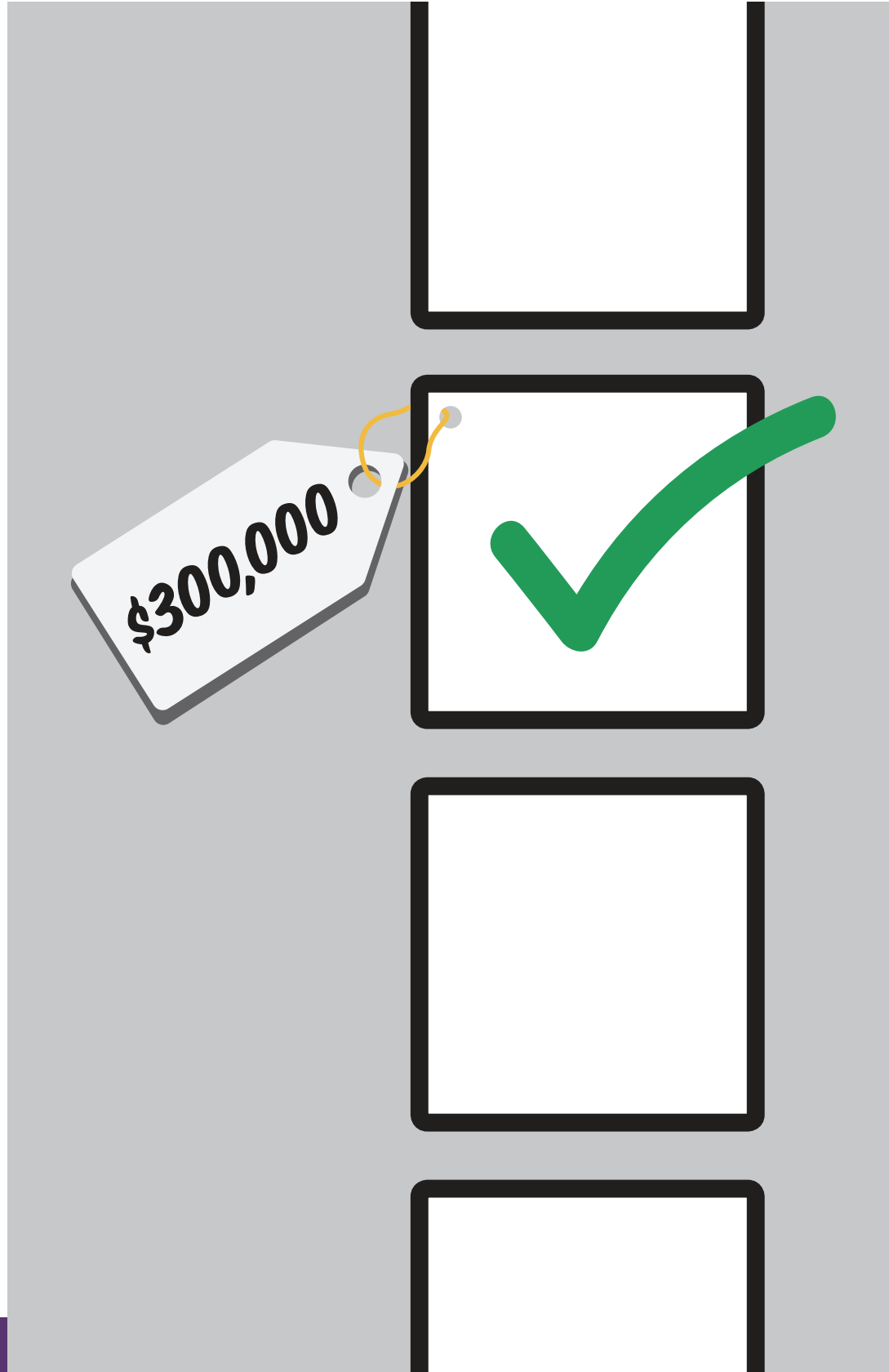
And when an employee has to take a compliance training course about gifts and entertainment because it's year two of your 3-Year Training Plan and that's when the gifts course pops up, even if that employee is months or years away from being high-risk for this...

How do you think they view that?

And how do you answer their question of "why do I need to do this right now?"

You end up saying "because this is when we do it," which is absolutely a check-the-box approach—just an expensive one.

There's a better way.



THE RIGHT WAY

Trigger it when they need it

Training should be made available when employees are about to do something risky.

And before you freak out: no, you do not need special software or a wizard consultant to do this. This is just about being smart with what you give people and when.

Now, before we go any further: this only makes sense if you are already on board with framing training around what people do. If you really love feeling like a law professor and want to keep teaching people abstract analytical frameworks, stop right here.

(And also, maybe consider quitting and becoming a law professor? Just a thought.)

But if you're with us, then how to do this flows naturally from the process of reframing your training. Instead of an arbitrary multi-year training plan, you offer people training at two times:

1. When they are about to do a task for the first time, as a mandatory guide; and
2. Every subsequent time they do that task, as an optional refresher.

To visualize this, think of when you use a new piece of software and it gives you a little tutorial the first time you do it, and then every time after that there's a "help" function that is easy to find. That's the goal here.

Now, of course, the trick is doing this in a way that actually happens every time they do the task and is so integrated into their process that it isn't overwhelming. When we go through an example of what this looks like put together, we'll talk more about that.

For now, just know that training should be triggered by an employee actually doing something—not just for the sake of saying that you did it according to a schedule.

PROBLEM THREE

It measures the wrong stuff

Finally, when compliance training is framed and delivered as an academic exercise, it gets measured like an academic exercise.

That's our last problem.

For example, when you ask someone about how they measure their training, they'll probably say something like this:

"*People did the training.*" (completion rates)

"*People learned something.*" (quizzes)

Because if your training is an academic exercise, your metrics are going to look and feel like academic metrics—did you show up to class, and did you pass the exam?

But compliance training is not academic—it's practical. And the right metrics aren't focused on the training itself, but its impact on your business operations. You'll measure that using monitoring, one of the other parts of your program.

Let's break this down.



"We had 80% completion!" = "We spent a lot of money!"

Completion rates are not a metric; they are an input. Using completion rates as a metric is the equivalent of sitting down for your performance review and saying "Well, I showed up every day. PROMOTION, PLEASE."

Except worse. Because training is a lot more expensive than you think.

That's because your company pays for salaries and benefits and overhead for every employee who sits through training. This is your biggest cost, and it adds up really fast.

For example, let's say you tried to train 10,000 people for one hour each last year, and you had 80% completion—so you actually trained 8,000 people. And let's assume that each employee costs your company around $50/hour.

Fifty dollars per hour multiplied by 8,000 people is $400,000.

So if you say "we had 80% completion," your business leaders hear "we spent $400,000."

And then they wait for you to articulate the benefit the company got for that money—because that's the real metric they want. The completion rate is just the "cost" part of the cost-benefit analysis. You have to go further than that.

"We had a 90% pass rate." = "Behold the army of compliance officers I have created!"

This metric gets into benefit territory, which is good.

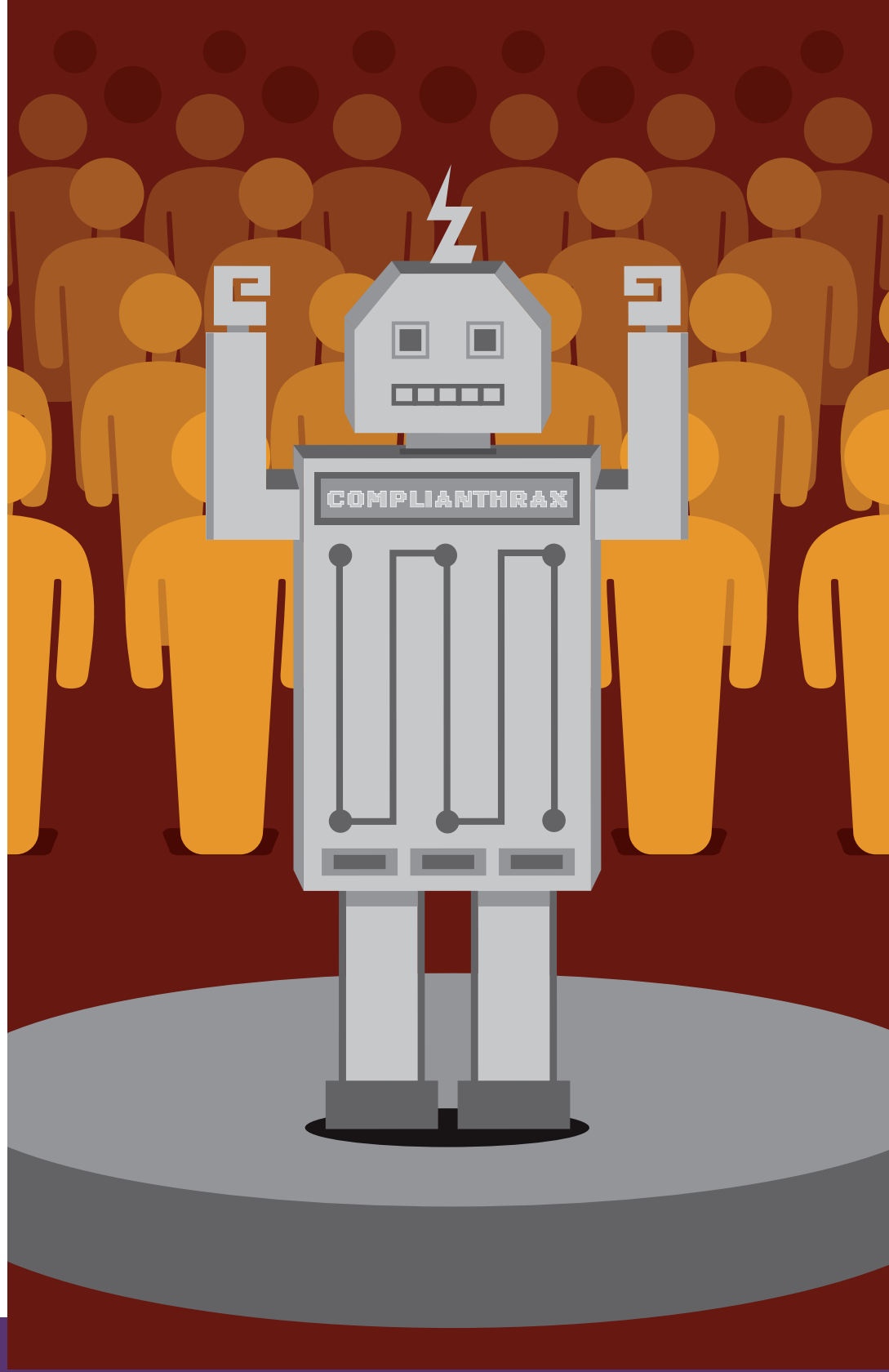
But it also gets back to our first problem with compliance training: the goal isn't knowledge, but behavior. You are trying to get people to do their jobs compliantly—not create an army of compliance officers so you can take over the world as some sort of very ethical supervillain.

(But if that is your goal, you know, neat. Maybe call yourself "Complianthrax.")

So while measuring knowledge through post-training quizzes is at least a benefit, it's not a particularly meaningful one: your goal is to get people to do things, not just know things. The DOJ and SFO do not randomly raid facilities to give compliance pop quizzes; they investigate things people actually do.

So although this is at least a "benefit" metric, it's still not the right one, and you can burn a lot of employee goodwill if you're constantly testing them on stuff.

There's a better way.



THE RIGHT WAY

Monitoring your processes

This is where everything ties together.

Because the core theme of this book is that compliance training should be integrated: it should be integrated into your business processes, your workflows, and the other parts of your compliance program. When you take this approach, you do not need to measure training as something separate from business process; you just measure business process, because that's how you see what people are actually doing.

That is, there is no such thing as "compliance training" if you're doing it right. There's just "job training" that has compliance elements incorporated into it. This is all that "operationalizing" stuff that the government talks about.

So, instead of developing separate metrics for training as if it's coursework, you just measure how good people are at doing their jobs the right way—which is the realm of your compliance program's monitoring element.

And that means your metrics will transform from this:

"We got a 90% pass rate on our fraud module quiz and hopefully people will do stuff with that."

Into this:

"We reduced inappropriately approved invoices by 40% this quarter by integrating new training into our approval workflow—and that saved us $81,000 over last quarter."

If throwing out cost savings like that sounds like crazy magic, it isn't. It's the type of basic business math that your company does all the time. Because when you shift from measuring "learning things" to "doing things," translating things into dollars becomes infinitely more achievable—which is exactly the type of metric that your business leaders want.

If this seems a little abstract, don't worry. In the next section, we'll walk through an example of what this looks like in practice.

Here's how to design training that works.

OK, let's put all of this together and take a look at what it looks like in practice.

Let's start with a familiar place: a compliance risk. We'll say that you've done a risk assessment and "anti-corruption" is one of your top risks.

What now?

Well, the wrong thing is pretty easy: go license some e-learning on the FCPA and UKBA and push it out to way too many employees. Track their post-training test results in case the government decides they care about that for some reason, and schedule follow-up training on some sort of multi-year basis.

And again, that's wrong because it's framed the wrong way, delivered on an arbitrary schedule, and measured using data that doesn't tell you anything that matters.

It's easy, sure, but only in the same way that the easiest way to climb a mountain is to go take a nap instead. It doesn't accomplish the goal.

So instead of that, let's walk through implementing this the right way.

STEP ONE

Frame it around what people do

The very first thing to do is identify the actual tasks that people do that create or control your risk.

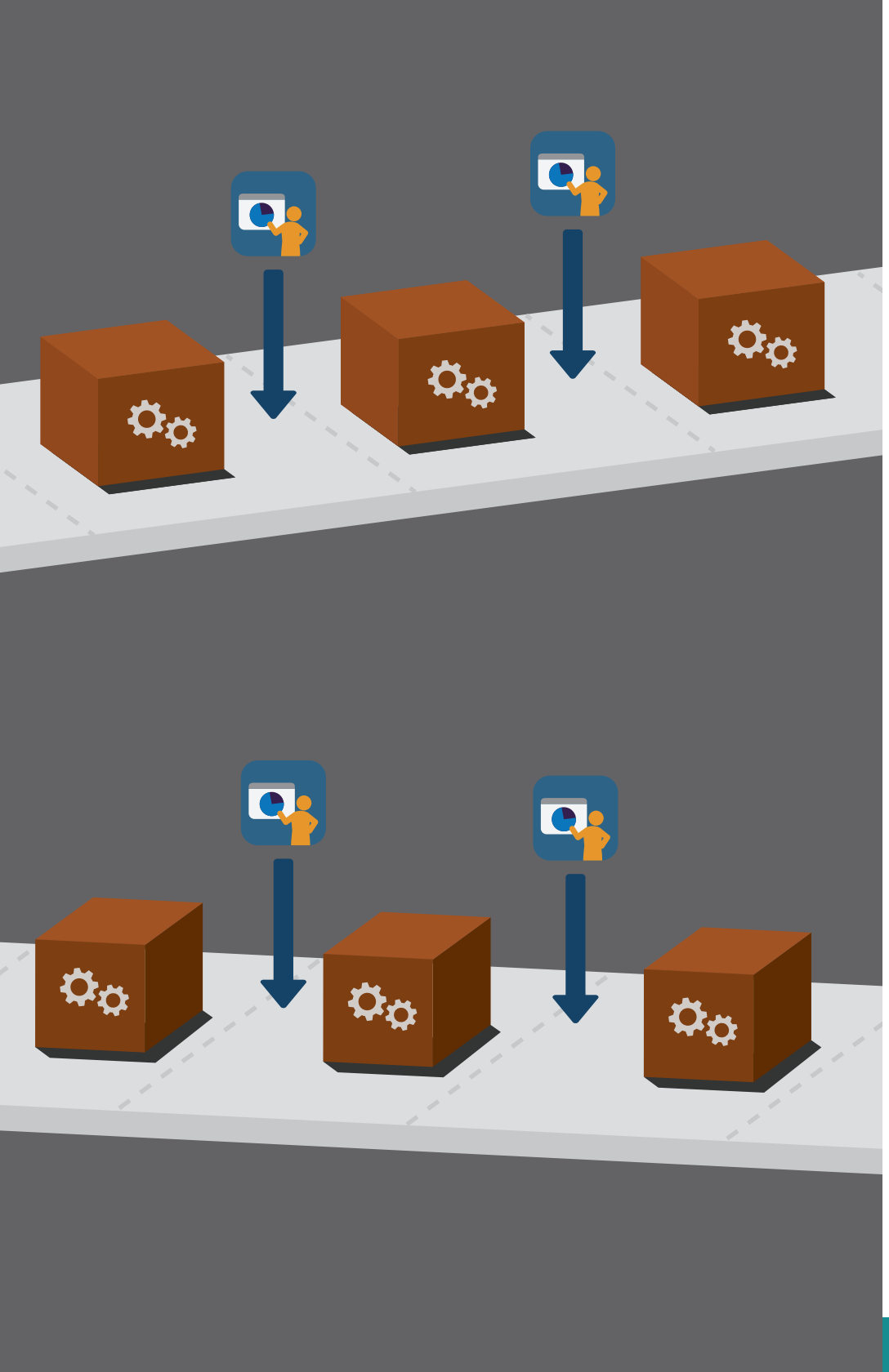
That's where compliance does or doesn't happen, so that's what your training needs to target.

This is different for every risk. For anti-corruption, it'd look something like this:

On the "create" side:
You'll have processes like "make sales" and "import products" and "hire overseas staff."

On the "control" side:
You'll have things like "approving invoices" and "reviewing T&E reports" and "putting new third parties through our contracting process."

And so on. Those are the types of things your training needs to be framed around—because that's what people actually do.



Divide and conquer.

Now, to be clear, you are not going to put together a big module that has every single task in it and roll it out as a package in your LMS. That would be overwhelming and waste a lot of time.

Instead, you are going to create bite-sized pieces of training that each tie to a specific task. That will let you integrate them into your business operations so that they are delivered at the right moment and feel like "job aids" instead of "compliance training."

This also lets you take a more tactical approach because you don't have to address every single piece at the same time. You will want to start with the riskiest job duty—whatever that is for you—and roll out training on that, and then you can get to the rest as you go.

Drill down into one thing, with one team.

Next, you need to sit with that single stakeholder and drill down into what really happens when people do that single task. Not "what our process is," but "what people actually do," because those are often different—and you need to know that.

For our example, let's say that due to your sales model, you decide that "approving T&E reports" is the first thing you want to tackle under your "anti-corruption" risk.

(Quick aside: if you don't know your sales model, stop reading and figure that out first. Don't read more compliance stuff until you know how your business operates.)

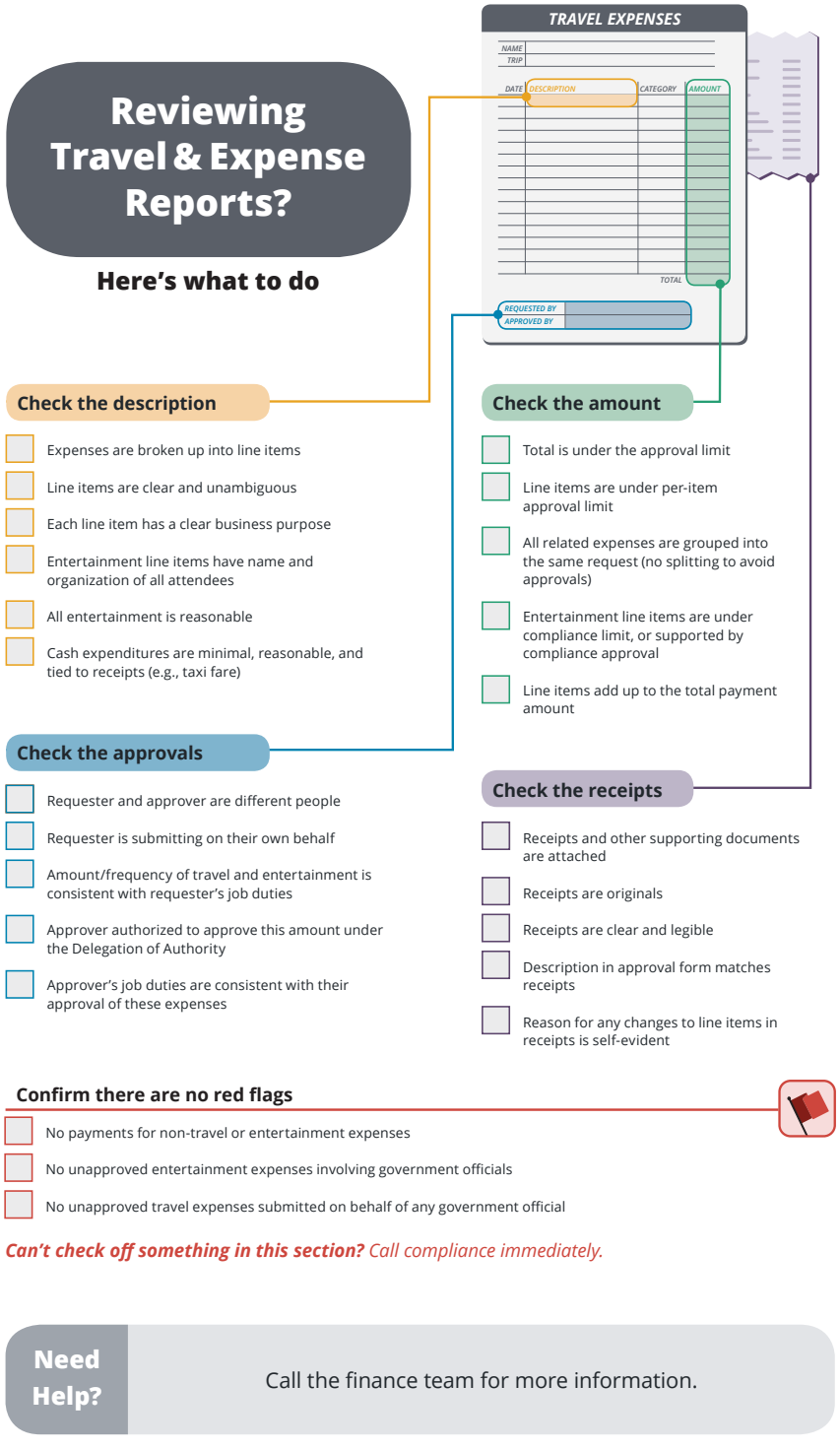
You'll go sit with the people who own T&E approvals—probably finance—and figure out how it works right now. And then you'll work with them to implement better processes or software to minimize the number of decisions people have to make, which is how you tighten down your controls.

But ultimately, you're still going to have a human element to this. That's where training comes in.

You will train to that human element by helping people know what to do in order to navigate the process the right way. As you do that, you'll identify other risks implicated by the process—and you'll weave those in to the training, too.

Want to see an example of what that would look like? Just turn the page...





Make training for initial learning and refreshers.

Now that you've drilled down and understand the task, you need to actually make your training.

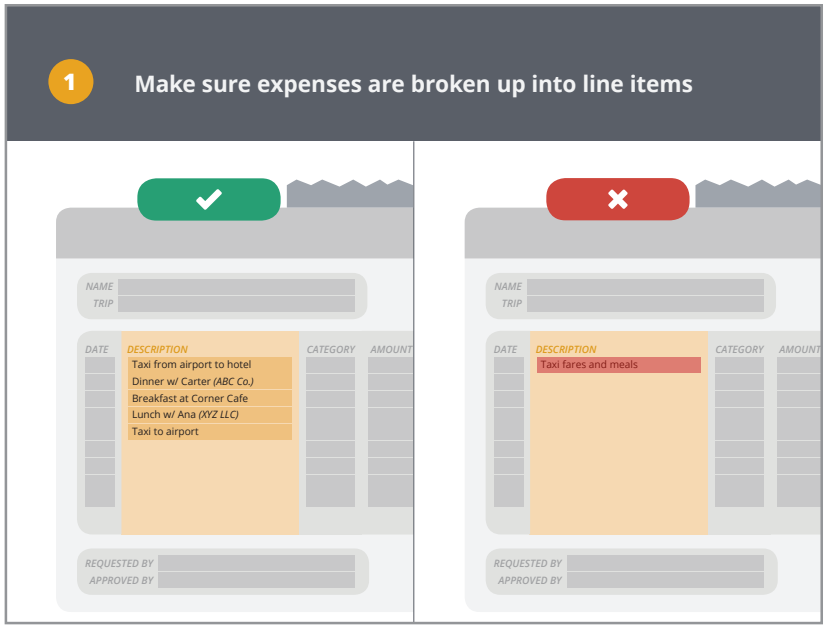
You want to create two types of training for your task: long-form and short-form training. This is to accommodate initial learning and quick refreshers (we'll get to the "why" of this when we get to delivering training).

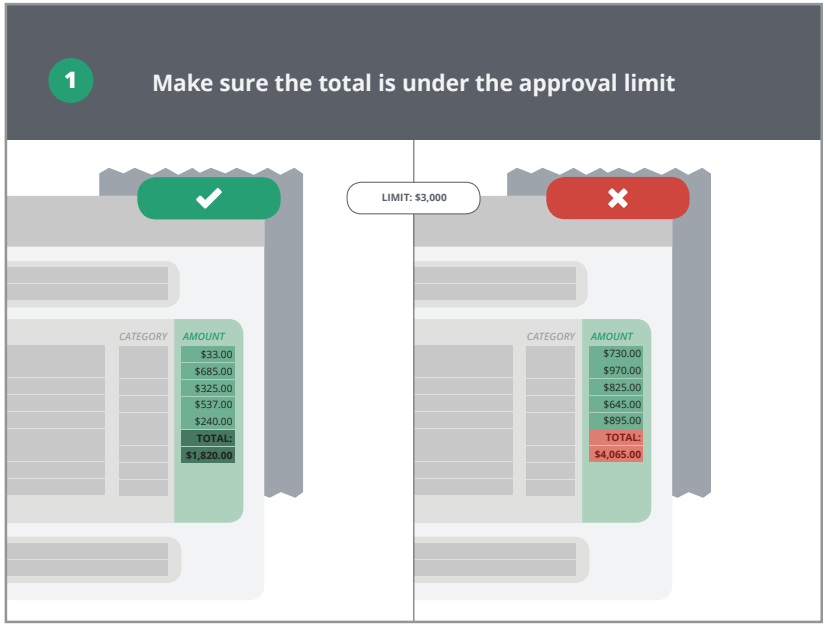
Short-form training

It's usually easier to start with the short-form one—it forces you to really understand the process because you don't have room for filler—so that's what we're going to do here. Over on the left, you see our short-form T&E training. It's captioned as a checklist, and it's broken down by the various sections of the T&E report that someone would review.

The to-do items on this checklist encompass a variety of risks: anti-corruption, fraud, waste, and so on. Since we've framed it around a job duty, employees don't need to worry about remembering eight different topics.

Logistically, we've created this as a single page—this will help with flexibility when we get to delivery methods.





Long-form training

This is our long-form T&E training. It syncs up with the short-form training and expands on it. This lets it act as both the initial training to walk employees through the process, as well as provide a reference for them if they have a question after using the short-form training.

The long-form training has a single page for each to-do item on the checklist; we've excerpted two of them over on the left. For each of those to-do items, employees get a contextual example of what's OK and what isn't—so they can compare and contrast the examples to their situation in order to make a judgment call.

Practically, this is a slide deck. There is no video or audio or animation, because we are trying to get the employee through the training at their own pace, not the arbitrary pace of a video or voiceover. This lets employees treat it as a resource instead of a one-time, passive event.

Now, all that said: "long-form" doesn't mean "slide deck" or "module." It does here because the task is complex and merits it, but many tasks might be fine with a long-form piece that is only a page or two. The key is the substance, not form; the short-form should capture all of the easy questions, the long-form the hard ones. Both should be as short as possible to get the job done.

Sound overwhelming? Don't worry—we can help.

STEP TWO

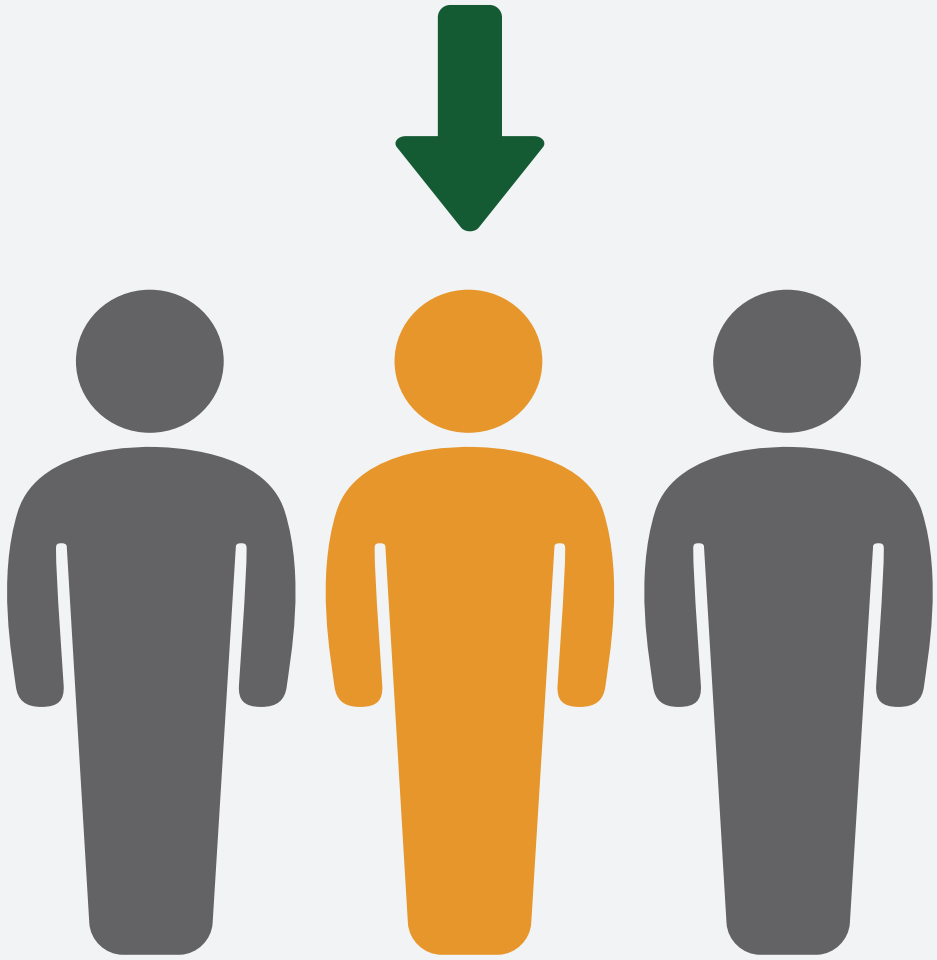
Deliver it when they need it

Now that we've created training framed around what people actually do, we need to deliver it at the right moment.

And that means we need to identify when those moments actually take place.

Again, we want to provide the training to our employees at two key times: the first time they do it (as a mandatory training) and every subsequent time (as an optional help).

So, let's dig into each one.



Identify first touch, then deliver long-form training.

Good news: this is the easy one.

That's because it's pretty easy to isolate when someone will be doing a task for the first time. They will have just joined the company, changed roles, or been given a new job assignment. All of this is data kept by HR.

Now, this is the part where you complain that you have a bad HR team and your HRIS software is actually just a guy named Gary with a graphing calculator.

Here's a really harsh statement that you need to hear: this does not excuse you from doing your job. It's totally possible that you have a weak HR team and garbage data—but you also have personal liability. So if your HR data is bad, either fix the problem or change jobs; sitting around and hoping for the best is a poor life choice.

At a bare minimum, get "this person just got hired/promoted"-level data from HR in an Excel spreadsheet every month. They need that data to pay people, so they'll have it.

Once you get at least "this person just got promoted" data from HR, you can take action. At a minimum, you deliver the training when their job changes; if at all possible, you deliver it when they actually do the task for the first time.

Let's take a look at this in our example of T&E approvals. An employee first gets exposed to T&E approvals when they've been promoted to manager, joined the company at a manager level, or have taken on this role as a member of finance.

The way you grab those people depends on how good your finance and tech systems are.

If your system is really good:

You have it identify when a new user has a T&E report to approve. You can have it automatically serve up the training when the person goes to approve their first T&E report (the best option), just email you so you can assign them the training in your LMS (the clunkiest option), or somewhere in between—there are a million ways to accomplish this depending on your tech capabilities.

The key is that something has happened in your system that is reasonably connected to the person doing the thing you are worried about, and that's what triggers you to give them the training.

If your system is Gary from HR with a calculator:

Have Gary send you a monthly Excel spreadsheet of people who have been promoted or moved into roles with T&E approval authority. You can assign that training in your LMS on a monthly basis, or send the training to their line managers for manager-led training, or get them all in a

room for compliance-led training, or any other method that at least reasonably ties the training to their new job role.

Of course, the first situation is much better. But don't get too hung up on this if it's a bridge too far for your IT system; just make sure employees get training when triggered by the new job duty, however you can pull that off. It's better to get closer to the task, inch by inch, than make no progress because you can't get the best possible thing done. You'll get them with the short-form training anyway—we'll discuss that next.

Make short-form training available real-time.

Now that you've given them the long-form training as part of their new job responsibility, you don't want to gamble on them memorizing it. Because they won't.

That's especially true for something as complex as "recognizing red flags in a T&E report"—that might seem common sense to you as a compliance professional, but there are actually a ton of steps involved, and you have to do it a bunch before it gets into muscle memory.

So, we need to give them the training every time they do it. And we need to do that in a way that makes it accessible, but not annoying—because then they'll just ignore it.

Again, think about using software: the little tutorial is helpful the first time, but after that you just want it to be easy to find help when you need it. It's annoying if you have to see the tutorial every time.

Over on the right, we've shown you how that would work in our example. First, when your employees have a T&E report to review for approval, there's obviously something that has to happen for them to know it. They'll get some kind of email or software notification (hopefully) or, at a minimum, some kind of paper form to fill out so they know that they've got something to approve.

No matter what it is, that's where you put the training.



And all you need to do is have it as an easy-to-see, prominent link that flags the compliance obligation and lets them dig deeper. It should make clear that approving the report has a compliance component and that they can get help if they need it. In our example, we just added a line saying "By approving, you certify that you have checked this report for red flags. If you need a refresher on what to look for, click here."

Note that we've made this part of the normal workflow email, not a separate thing. That's important. If they receive a separate email, they'll learn to ignore it as spam—and it'll further reinforce the idea that compliance is not part of their normal business duties.

Next, notice that when they're reviewing the short-form training, they get the option to dig into the long-form training if they need more help. And if even that fails, they get a link to contact compliance for questions.

That's it!

There's a lot of bluster about "just-in-time" training, but this is what it actually means. Basically, someone is doing a risky thing, and you offer them guidance on doing it the right way by flagging what they're doing and linking to help.

From the employee's perspective, they're not even getting compliance training; they're just getting help making sure they're doing their job compliantly.

And from your perspective, this is a much more defensible method than scheduled topic-based training.

Because if things go bad and you're sitting across from a prosecutor, your best case with topic-based training is to go through and count everything that might be related to the risky thing the person did so you can say something like "based on our LMS data, this employee was trained 20 times." That's training for the sake of training, with the hope that if that number is high enough you'll get off the hook.

But when you integrate training into your risky tasks, you don't have to go count LMS records. You can just say "this employee was presented with a compliance certification and guidance on this risky task literally every time they did it." And no matter how high your counting-up-all-your-stuff number is, it is never going to beat "literally every time."

But that's not the only benefit you get here. Because framing your training around job duties and delivering it at the right moment makes measurement a lot easier, too. That's our last step.

If you'd like to see a sample of our training and communications, skip to page 84 or go to compliancedesignclub.com



STEP THREE

Measure what they actually do

Let's take this home.

You've distilled a risk down to various risky job tasks, you've focused on one task at a time, and you've decided to train people on those tasks when they're actually doing them.

Because you've done that, the metrics are logical: instead of measuring training completion or quizzing your employees about legal theory, you're going to see how good they are at actually doing the task in real life.

In our example, that means asking "how good are our employees at approving T&E reports under our policy?"

And answering that means monitoring.

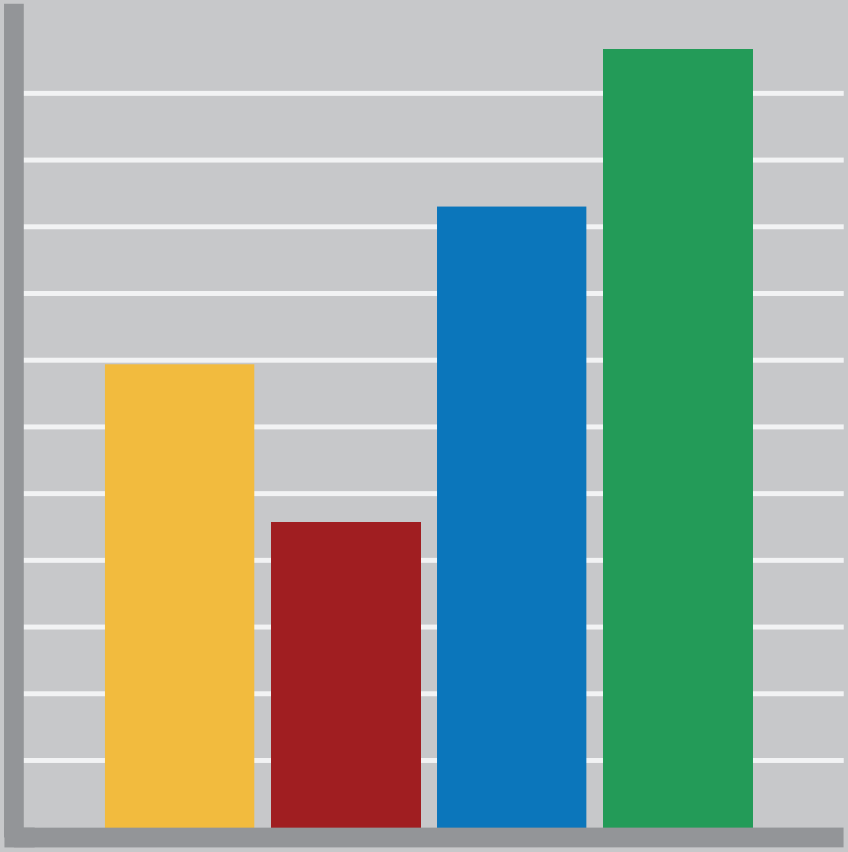
That's right: if you've framed your training correctly, you don't have to create all these new measurement methods—you just do what's already in the Federal Sentencing Guidelines.

And that means you have metrics that not only tie to real-world activity, but can be converted to dollars. So you don't have to tell your executives you had a "90% pass rate," because that means nothing—you can tell them that you saved them $83,100 in real money.

This is not future stuff; this is what you should be doing from Day One. And it's not just useful for training, either: what we're about to discuss applies to anything you do.

Because this is just making a simple business case, and it's critical to getting funding for anything you do.

So, here's how to do it.



Measure the results.

You've trained people on how to do a specific thing compliantly; now you pull the records and see if that's actually happening. The question you are answering here is "how many times did this happen?"

Here's what it looks like for our T&E example: we know we've given people a checklist on what red flags to look for, so we want to see if they're catching them or not.

If you've got some kind of fancy software, you plug in what you're looking for and see what it says. For example, you ask your software to pull "T&E reports with line items over $1,000" or "T&E reports coded to government projects with line items over $40." Stuff like that—just call your software vendor and walk them through the items on your checklist that you care about so that they can build a report for you.

If you're doing it manually, you just flip through the T&E reports and proof them against the checklist. If there are a lot, limit the scope to higher-risk reports (coded to government projects, high dollar value, etc.) or do a sample. If you don't have time, ask a junior team member, junior auditor, or a junior outside auditor to knock it out. It should be quick in any event.

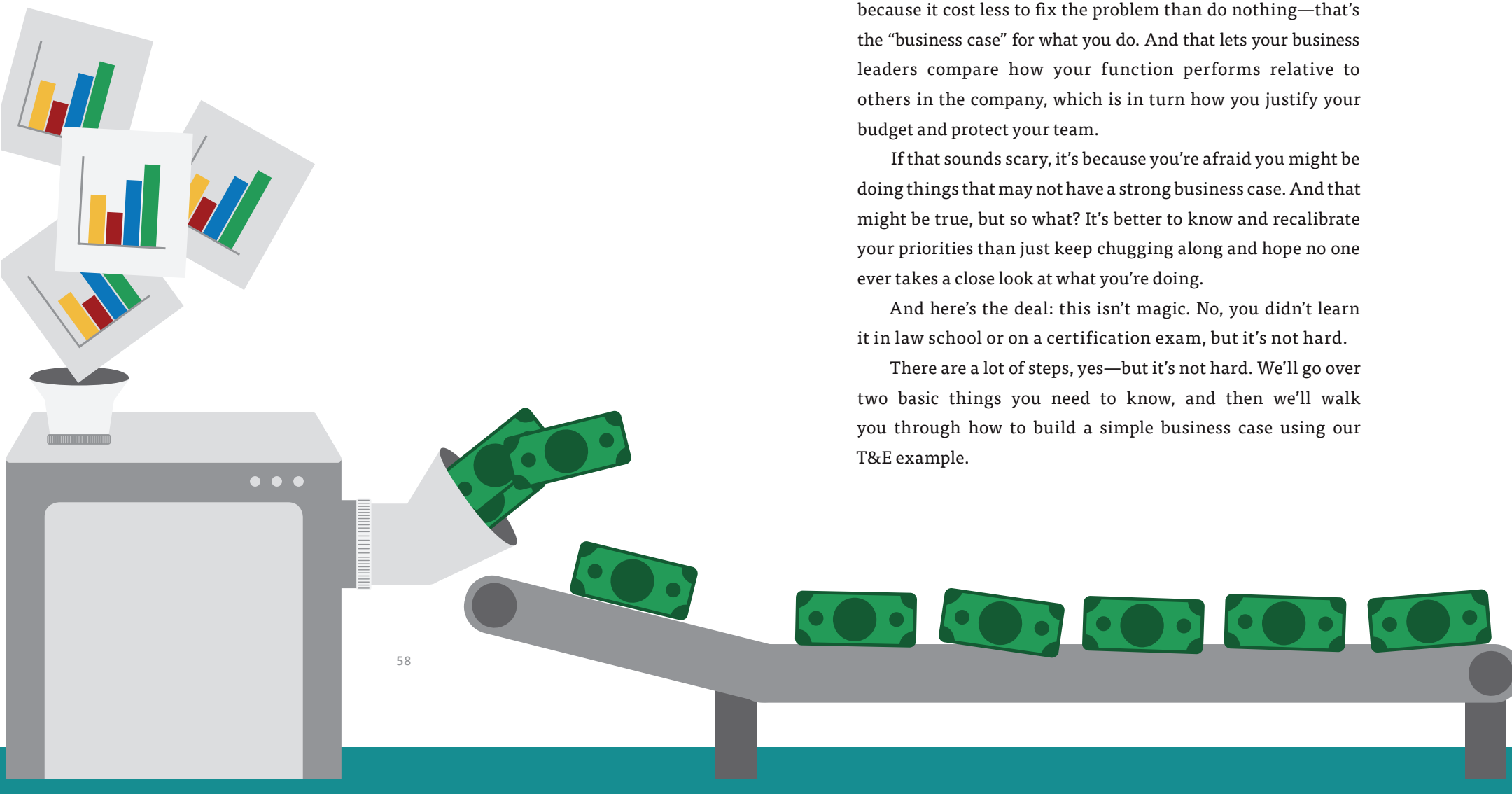
You want to do this for two time periods: before you did the training and after you did the training—and make sure those two time periods are of equal length if at all possible.

Your final result should sound something like this:

> *"Last quarter, our people approved 100 T&E reports that had red flags in them. We added training into the approval workflow, and this quarter that number dropped to 10."*

That is a real metric, which measures a real result.

But it's still not a business case.



Convert the results to dollars.

We have a business result, but that's not good enough.

Because a concrete number of potentially inappropriate T&E reports is a real result, but it lacks context. Is it a good number? Was it worth doing it?

The way to add context is to convert our result to dollars.

That lets you show that it was worth it to fix the problem, because it cost less to fix the problem than do nothing—that's the "business case" for what you do. And that lets your business leaders compare how your function performs relative to others in the company, which is in turn how you justify your budget and protect your team.

If that sounds scary, it's because you're afraid you might be doing things that may not have a strong business case. And that might be true, but so what? It's better to know and recalibrate your priorities than just keep chugging along and hope no one ever takes a close look at what you're doing.

And here's the deal: this isn't magic. No, you didn't learn it in law school or on a certification exam, but it's not hard.

There are a lot of steps, yes—but it's not hard. We'll go over two basic things you need to know, and then we'll walk you through how to build a simple business case using our T&E example.

Know your costs.

There are two ways a team can add value to a company: add revenue or reduce cost. You are on the "reduce cost" side.

So we need to start by discussing the types of costs we'll be dealing with, because we'll use those over and over again. And we'll be using two basic types of costs to help you think about things.

External cost

This is pretty much any non-payroll spend. Software, licensing, consultants, outside lawyers, and so on all go in here—this is money you pay outside of the company. You know how to calculate this: you just look at all the invoices or bills.

Internal cost

This is what it costs for the company's employees to do something. You can calculate internal cost like this:



You can get really accurate with employee cost per hour if you want—because, for example, your in-house lawyers probably cost more than your security guards—but for most cases an average cost should be fine.

You should be able to get that number from HR; if you don't have it, $50 is a fair cost per hour for a company with more than 500 employees (if you want more granular data on this by type of company, size, union status, etc., the US Bureau of Labor Statistics has that).

Those are the two types of costs we're working with. The most complicated math you have to do so far is multiply "number of hours spent on something" by $50.

Know the basic formula.

Every compliance project can basically be evaluated using the same formula. It looks like this:



If the "Result" is positive, your fix made business sense. If not, it didn't.

Because at its simplest, it should cost less to fix the problem than the problem itself costs. This is the most basic business case possible. If you're spending more to fix problems than the problems cost, something is wrong.

Let's break that down.

Calculating the Cost of Problem

First, you want to start by calculating what the problem itself costs.



Here, "Internal Cost" is going to be the time your folks spend dealing with bad processes or cleaning up errors caught in audits and investigations.

"External Cost" is money that's being inappropriately spent—fraud, overspend, whatever—as well as money you have to pay outside advisors to help you clean up the problem on a routine basis.

You start with this because it helps you choose how you're going to fix the problem—that is, you should be doing this before you actually try to fix it. We're assuming training is the right solution for our example, but that's not always true—especially when you're talking about training big groups of people. Knowing what the problem costs helps you choose a solution that is not only likely to fix the problem, but has a low enough cost to where it makes sense in the first place.

Calculating the Cost to Fix Problem

Next, you want to calculate what it costs to fix the problem.



Hey, same formula! See: lots of steps, but not hard.

Here, "Internal Cost" is going to be the time of everyone involved in fixing the problem. If you choose training as your solution, for example, it's not just your time in making and administering the training—"Internal Cost" also includes all the time spent by every employee in sitting through it. (That's why all-employee training is almost always a terrible solution—the internal cost is astronomical.)

"External Cost" is the amount you pay to vendors and outside advisors to help you fix the problem. Some of those costs will be one-time, and some will be ongoing. We'll get into the difference when we go through the example in the next section.

Calculating the Cost of Problem After Fix

Third, we calculate what the problem costs after the fix.



You do this the same way we did our first calculation. You have to figure this out because most of your fixes are not going to totally wipe out risk; you're still going to have some stuff left over. In our T&E case, for example, we still have 10 remaining reports with red flags that slip through each quarter.

Calculating the Result

Finally, after we have those numbers, we do the math.



If the "Result" is positive, the project made business sense.

As you get more used to doing this type of quick math, you'll find that it makes you smarter about what type of compliance tools you use. For example, the all-too-common play to "let's revise the Code and do a bunch of companywide e-learning" becomes pretty silly when you start putting numbers on it; it's almost impossible to get a positive return on investment there.

But this is still all abstract. So, let's go through our T&E example to see what it looks like in practice.

Example: Calculating the Cost of Problem

First, let's calculate what the problem costs; remember that our starting point here was "100 T&E reports that were inappropriately approved."

The answer here is probably not just "the value of 100 reports." Because realistically, most of those will turn out to be fine; the problem was that they were inappropriately approved, not that they were totally illegitimate expenses.

And your audit and investigations teams will have it on their plate to figure all of that out. Because the problem wasn't fixed proactively, you have to deal with looking at 100 T&E reports with red flags in them, auditing or investigating them to see what you're dealing with, and then figuring out how many actually should have been rejected outright.

That means our costs look like this:

Internal Costs

This is the total amount of internal time spent to sort through all of the reports.

Here's how we figure that out: let's say you started off by having someone on the compliance team flip through all 100 reports and identify that, at the end of the day, only 40 of them were a potential problem. The others had red flags, but they were clearly not a problem. This was probably done as part

of identifying the 100 reports in the first place—as part of identifying the problem, instead of cleaning it up—so we'll be generous and say this was free.

Cost: $0

Next, you have someone from your audit team help you do a deep-dive into the 40 remaining reports. They check receipts and do some internet research and determine that 20 clearly should never have been paid, and 5 of those are so troubling that they need to go for further investigation. This takes your audit team 60 hours in total. Since we know each hour of employee time costs the company $50, this part cost $3,000.

Cost: $3,000 (60 hours x $50)

Then, your investigations team takes up the 5 reports that audit couldn't clear. They review documents, talk to witnesses, and write reports. They are able to close 4 of the cases without a problem, but have to refer the final case to outside counsel (we'll get to that under External Costs).

Each internal investigation takes around 60 hours of investigator, witness, and management time—so 300 hours in total. We multiply 300 hours by our per-hour cost of $50, and we get $15,000 for this part.

Cost: $15,000 (300 hours x $50)

Those are the only internal costs we see here, so we just add up $3,000 for the audit review and $15,000 for the internal investigations to get a Total Internal Cost of $18,000.

Total Internal Cost: $18,000

External Costs

This is the total amount of reports that should have been rejected, plus the cost of any external advisors or tools that were used in sorting through the reports.

We know that audit identified 20 reports that should have been rejected. We add up the value of all of these reports, and let's say they turn out to be worth $16,000 in aggregate. That's our first piece of external cost.

Cost: $16,000

We also have bills from our outside counsel for a two-week investigation they did into that last high-risk report. We just look at the total on the invoice they sent, and because we have amazingly cheap outside counsel, that total is only $14,000. That's our next piece of external cost.

Cost: $14,000

Then we add up the $16,000 in should-have-been-rejected reports and $14,000 in outside counsel spend. That gives us a Total External Cost of $30,000.

Total External Cost: $30,000

And then, to figure out our Cost of Problem, we just add up our Internal Cost and External Cost.



So, that's our starting point: $48,000. That's what our problem cost us last quarter.

Note: a really aggressive businessperson might argue that the only "real" cost here is the $16,000 in T&E reports that

should have been rejected, because you could just decide to not look at the other ones or even do this at all. So you could also just use that $16,000 as the cost of the problem—we'll go through a scenario like that later.

If you're reading this book, however, that shouldn't be your situation; most companies do not get on board with compliance until after they already have audit and legal functions, and so they'll be on board with the idea that you have to look for stuff and fix it when you find it. But we'll come back to this in a bit.

Example: Calculating Cost to Fix Problem

We now know that our 100 sketchy T&E reports cost us $48,000 in one quarter.

Now, ideally, you haven't actually tried to fix the problem yet. Instead, you use that number to figure out the best way to fix the problem and stay cost-effective—that is, you decide to do training or buy software or hire someone because it makes sense given the cost of the problem.

In our hypothetical we've already done training and measured the results, so we'll just be using this to see if our solution actually saved money. That's fine too, but it's a gamble—it's much better to use the cost of the problem to help pick the right solution on the front end.

Now, the Cost to Fix Problem has a little more going on than the Cost of Problem itself. That's because "fixing the problem" usually involves a bunch of up-front costs and then relatively smaller costs afterwards. You buy some training or software and install it, and then you have ongoing fees that are much smaller.

It's easiest to show this with an example, so here's what that looks like for our T&E case.

Internal Costs

This is the total amount of internal time spent in creating and setting up the training, plus the time for each employee to sit through the training.

Let's say that you buy outside training, so your "creation" time is just 5 hours of customizing the training, and then your "setting up" time is 50 total hours of working with your operational teams to insert it into their workflows. This will normally be a one-time cost. We multiply 55 hours by our $50/hour cost, and we get $2,750 for this piece.

Cost: $2,750 (55 hours x $50)

Next, let's say that we wanted every employee with T&E approval responsibilities to go through mandatory long-form training right away. We have 2,500 of those employees and we estimate it will take them an average of 15 minutes each. That works out to be 625 hours in total; multiplied by our $50/hour cost, the mandatory training runs us $31,250.

Cost: $31,250 (625 hours x $50)

We've now gotten everyone caught up, but we also get new employees with T&E approval responsibilities every year—this is an ongoing cost. We talk to HR and find out that we get around

100 new hires or promotions to manager every year. We need to give them the training when they get the role; if we assume that these folks also take 15 minutes to go through the training, we're looking at 25 total hours of long-form training every year to capture these new managers. Multiplied by $50/hour, this runs us $1,250 a year in ongoing, annual cost.

Cost: $1,250 (25 hours x $50)

Adding those numbers up, we get a Total Internal Cost of $34,000 for the first year and $1,250 every year after that.

First Year Total Internal Cost: $34,000

Recurring Total Internal Cost: $1,250

Note: we have not included the time for employees to review the short-form, refresher training here. That's a value judgment; the marginal time involved in that kind of voluntary, problem-centered training is a little too granular for the level of case we're doing. We get more into that in a few pages, in the "You don't have to outrun the bear" section.

External Costs

This is the amount it costs to buy or license the training, plus the cost of hosting the training on an LMS or other compliance-specific software.

Let's say you bought the training modules for a one-time cost of $10,000.

Cost: $10,000

And although you've embedded links to the short-form training in employee workflows, you are actually hosting it in your LMS. You pay $50,000 a year for your LMS, and that's obviously not just for this specific training; so, you decide that this specific training makes up about 5% of your total need for the LMS. That means your annual hosting need is 5% of $50,000, or $2,500.

Cost: $2,500 (5% of $50,000 annual fee)

Adding those numbers up, we get a Total External Cost of $12,500 for the first year and $2,500 every year after that.

First Year Total External Cost: $12,500

Recurring Total External Cost: $2,500

Now, we add the costs together to figure out our startup costs—what it costs the first year to get everything in place—and then our ongoing costs.

First year:



Recurring:



So our first year costs $46,500, and then every year after that we spend $3,750.

The reason we want to get both of these numbers is that sometimes your startup costs will be more than the problem itself costs in a year—if you decide to implement better software, for example. Getting the ongoing cost helps you map out how things will look in the future so that you can figure out if and when you will recoup your investment.

Example: Calculating Cost of Problem after Fix

We know that our problem costs us $48,000 in one quarter. And we know that our startup costs to fix it are $46,500, and then $3,750 a year after that.

So far, things look good. If we say that the quarter we looked at was what things normally look like, our problem costs the company $192,000 each year. And even if that quarter was a fluke and the problem was only half as bad—so $96,000 a year—our proposed solution is a lot cheaper.

Assuming, of course, that it works.

The reality is that no control is perfect, so you have to recalculate what the problem costs *after* you put the fix in place. To do this, you use the exact same method you used to calculate the initial problem; you want that measurement to be consistent.



If you're stretched for time, you can just extend the same math you used in the original equation. So if you reduced the problem by 40%, you'd just estimate the "after-fix" cost to be 40% of the original cost.

For example, in our T&E example our problem dropped to 10 missed reports—10% of what it originally was. If we wanted to be rigorous, we'd go through those 10 reports exactly like we did before and calculate what they cost.

If we wanted to be quick, we'd just say that since 100 reports cost the company $48,000 a quarter, 10 will probably cost the company $4,800 a quarter.

That's not the tightest math in the world—we wouldn't, say, build an investment pitch off of it to take on *Shark Tank*—but for a purely internal business case it's probably fine if you're short on time. You just need to be clear that you're working on that assumption and haven't actually measured the after-fix situation.

And that's actually what we're going to use here to keep this book simple. We're going to say that our after-fix cost is $4,800 in one quarter.

Example: Calculating the Result

Now we have our:

1. Cost of Problem ($48,000/quarter)
2. Cost to Fix Problem ($46,500 first year, $3,750 every year after that)
3. Cost of Problem After Fix ($4,800/quarter)

We want to compare apples to apples, so let's convert everything to years. (This is a big assumption, by the way, and it's not always appropriate to make. We're doing it here for simplicity.)

That means our Cost of Problem becomes $192,000, and our Cost of Problem After Fix is $19,200.

Now we can see if our project was worth it. Remember, this is the formula:



And we're hoping that "Result" is a positive number, because that means fixing the problem cost less than the problem itself.

We'll start with our first-year numbers, which look like this:



Good news: it worked! It cost us $192,000 to have the problem, and after we fixed it our costs were $65,700. We have saved the company $126,300 in the first year alone.

Every year after that, it gets even better:



Our problem would continue to cost $192,000 a year, but our after-fix costs drop to $22,950 a year. That means we save $169,050 every year after that.

Now, this is an easy example because our solution cost less than the problem right away. But as we said before, that's not always true.

So let's use that scenario we mentioned earlier, where your business wants you to just focus on the totally inappropriate T&E reports—the ones that should have been totally rejected—and not worry about investigating all the other red flags. So we drop all of the costs related to reviewing and investigating the reports and just use the cost of those 20 reports that should have been rejected.

(This type of thing happens at companies that just want to focus on internal fraud. To be honest, if this happens at your company, you have bigger problems than math—but stick with us here.)

In our example, those 20 reports were worth $16,000/quarter. But let's ramp this up even more and say that those reports were only worth $10,000/quarter. If we keep everything else the same, our Cost of Problem After Fix would be $1,000 in one quarter.

And if we make those apples to apples with the rest of our assumptions, we're looking at our annual Cost of Problem being $40,000 and annual Cost of Problem After Fix being $4,000.

When we do this math, the first year doesn't look so good.



Because the problem is so much smaller, we actually spend $10,500 more the first year than if we just did nothing. That is not a good result.

But when we look at every subsequent year, with our much lower ongoing costs, things get a lot better:



So in this case, you'd want to go to your business leaders and show that, even if you totally ignored the cost of looking at

and investigating all of those T&E reports, you'd still be better off fixing the problem than doing nothing. You'd do that by making a chart like this.

Year	Total Savings to date	Cost of Not Fixing	Cost of Fixing
1	-10,500	40,000	50,500
2	21,750	40,000	7,750
3	54,000	40,000	7,750
4	86,250	40,000	7,750
5	118,500	40,000	7,750

This helps you show that you start off negative, but things turn around and then snowball into a whole bunch of saved money.

And that's it! That's how this works for the vast majority of cases.

Now, if you have a really huge up-front spend that will take years to recover—like a major software purchase—and it's a really important project that will get a lot of scrutiny, you might want to take it a step further and do a discounted cash flow analysis. Because future money is worth less than right-now money, a discounted cash flow analysis lets you calculate more accurately whether your project will be worth it. It's basically the same process; you'd just be applying another round of math to that chart we made.

We're not getting into that here, because it's overkill for most things. Just know that if you want to do a really huge spend and you're getting a lot of pushback, you'll want to recruit someone from the business team to help make sure you're discounting the future savings appropriately.

You don't have to outrun the bear.

A few final words on making the business case: business cases are not social science studies.

The biggest enemy to making them is discomfort with the fact that they all work on assumptions and have some degree of fuzziness or uncertainty because they are all dealing with the future in some sense. It's tempting to think that because you can't back up every single thing with a study or case law, it's better to not even try.

Don't get bogged down in that. Your goal is not to publish in a peer-reviewed journal with a tight p-value. Your goal is to just be rigorous enough to where you can make business cases that credibly defend your program, help you select the right projects, and secure your budget. That's it.

Because remember, if your business starts making cuts, you don't need a perfect business case—just a better one than some of the other corporate teams. Think of it like this: if you and your friends are being chased by a bear, you don't have to outrun the bear. You just have to outrun your slowest friend.

So don't worry about whether your business case is perfect; no business case is perfect. You'll learn from your executives how much detail they want as you go.

Just start running—so that if the bear comes, your team won't be at the back of the pack.

Here's how we help you do this.

We want to be clear: you can do this on your own. Whether you should, of course, is a different question.

Your highest value isn't sitting in your office, generating content. It's being out there in front of your employees and leaders, getting your hands dirty with the business so you can know and relate to what their problems actually are.

And we free you up to do that.

We're Broadcat, and we're a compliance design company. And that's just a well-marketed way of saying that we make the best customizable infographics, checklists, job aids, and more—everything you need to handle all your corporate compliance communications, made by people you trust.

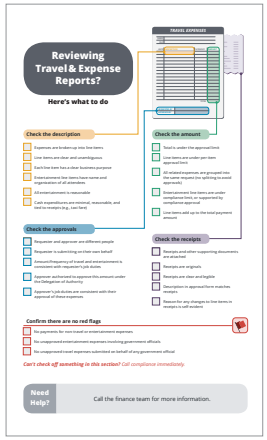
Our designs are editable, customizable, and yours for the keeping in our groundbreaking membership program: Compliance Design Club. Turn the page to find out what we mean.

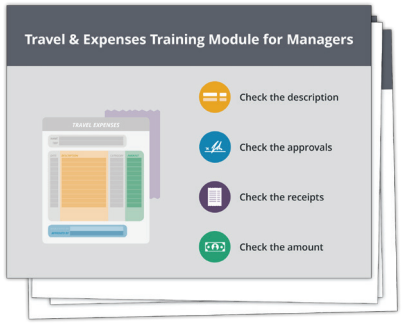
Simple, task-oriented training

We're best known for our training.

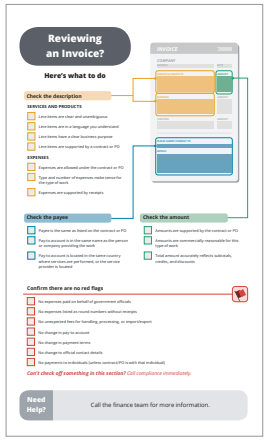
It's built on the approach laid out in this book, working backward from common business process gaps to help your employees do their jobs the right way.

Turn the page to take a peek at the best training you'll ever see—we've included a few products from our Compliance Design Club for your viewing pleasure.



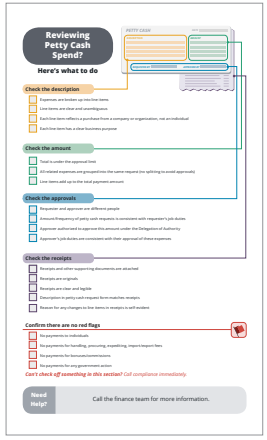


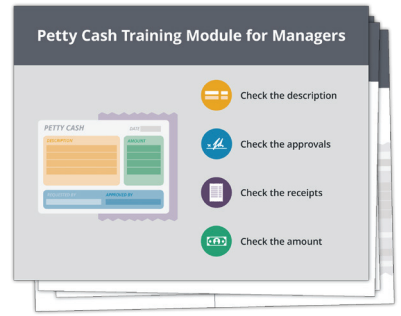
INVOICES





PETTY CASH





Financial Controls Training

First up: these should look familiar.

That's because the T&E example we worked through in this book is one of our tools that covers short- and long-form training on red flags in T&E, invoices, and petty cash—you know, the ways your company spends money on stuff.

And nailing down "how your company spends money on stuff" is critical, because a good number of your compliance risks hinge on your financial controls. So if your managers and finance team are catching questionable spend before it happens, you're in good shape.

Each financial process gets an editable short-form checklist and long-form module that can be customized to your policies and procedures. You'll integrate them into your approvals process and measure the results exactly like how we've laid out in this book, and you'll tackle a whole bunch of risks in the process.



GOING OVERSEAS ON A BUSINESS TRIP?

HERE'S YOUR TO-DO LIST

GET PRE-APPROVALS

- [ ] Planned business gifts and entertainment
  If giving to a government official or more than $150, you need pre-approval
- [ ] Product samples you have to carry with you
  It's easier to ship in advance—if you can't, email [TradeControl@Company.com] for help

PACK SMART

- [ ] Take a Safe Laptop instead of your regular computer
  Avoid problems at customs—email [safelaptop@Company.com] to get a travel-safe machine
- [ ] Understand how to rotate your SIM card if necessary
  If this applies, IT will inform you when you get the Safe Laptop
- [ ] Only take work files you need for this specific trip
- [ ] Know how to disable WiFi and find secure networks
  Need a reminder? [It'll appear when you boot up your Safe Laptop]
- [ ] Bring a privacy screen for your laptop to use in public areas

BE IN THE KNOW ON THE GO

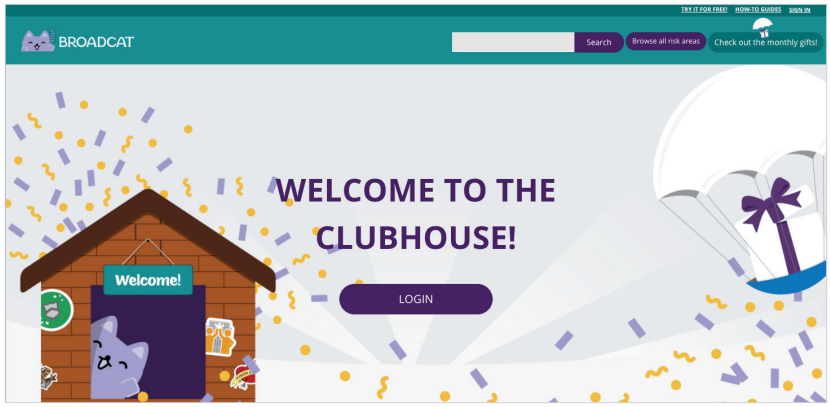
- [ ] Review what to do if you get asked for a bribe on the spot
  Need a reminder? Check out the [RESOURCE (Intranet, call Helpline)]
- [ ] Save the Ethics Helpline and 24/7 Travel Desk in your phone
  Ethics Helpline: [NUMBER] — Travel Desk: [NUMBER]
- [ ] Keep your Emergency Card on you at all times, just in case
- [ ] Hold all business and travel documents until you return
  Do not discard confidential information at the hotel, in a public place, or another company's office

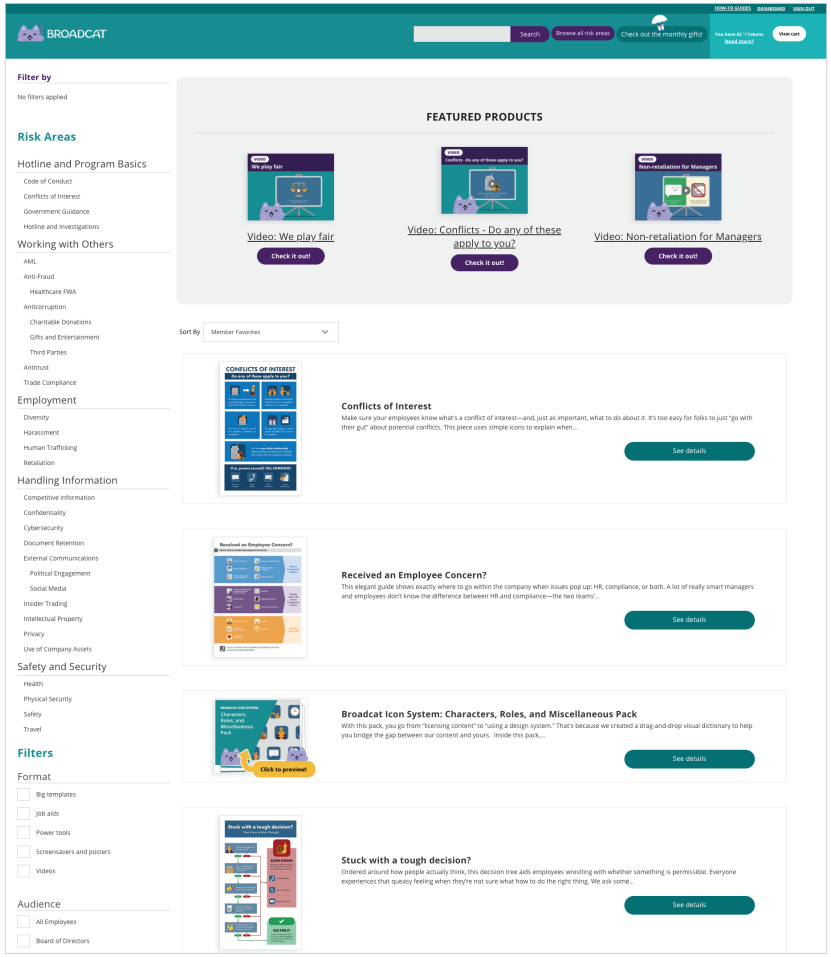
Travel Checklist

You know what's really risky? International travel.

It triggers a whole host of risks ranging from anti-corruption to cybersecurity—and that's a problem if you're still doing training based on risks. Because the likelihood of someone remembering all those different risk topics before a trip abroad is basically zilch.

This short-form training helps you out. You integrate it into your travel workflow so that when an employee receives that "here are your trip details" email from your travel system, they also get a prominent reminder that travel involves compliance obligations—and this piece helps them understand what they are.





And much more.

This is just a tiny sampling of our training.

We have tons more resources to share. When you become a Member of Compliance Design Club, you get access to an innovative program with compliance training and communications that are editable, customizable, and yours for the keeping.

For low annual dues, you get 40 tokens to redeem for *a la carte* compliance training and communications—everything in Compliance Design Club is flexible, practical, easy, and effective. And created by compliance experts you trust.

To join, you won't pay based on the number of employees you have. You won't pay for everything available. *You only pay for what you use*. And once you download it, you get to keep it.

That's right: you can keep it *forever*.

And that's not all. As a Member, you get a free compliance gift every single month.

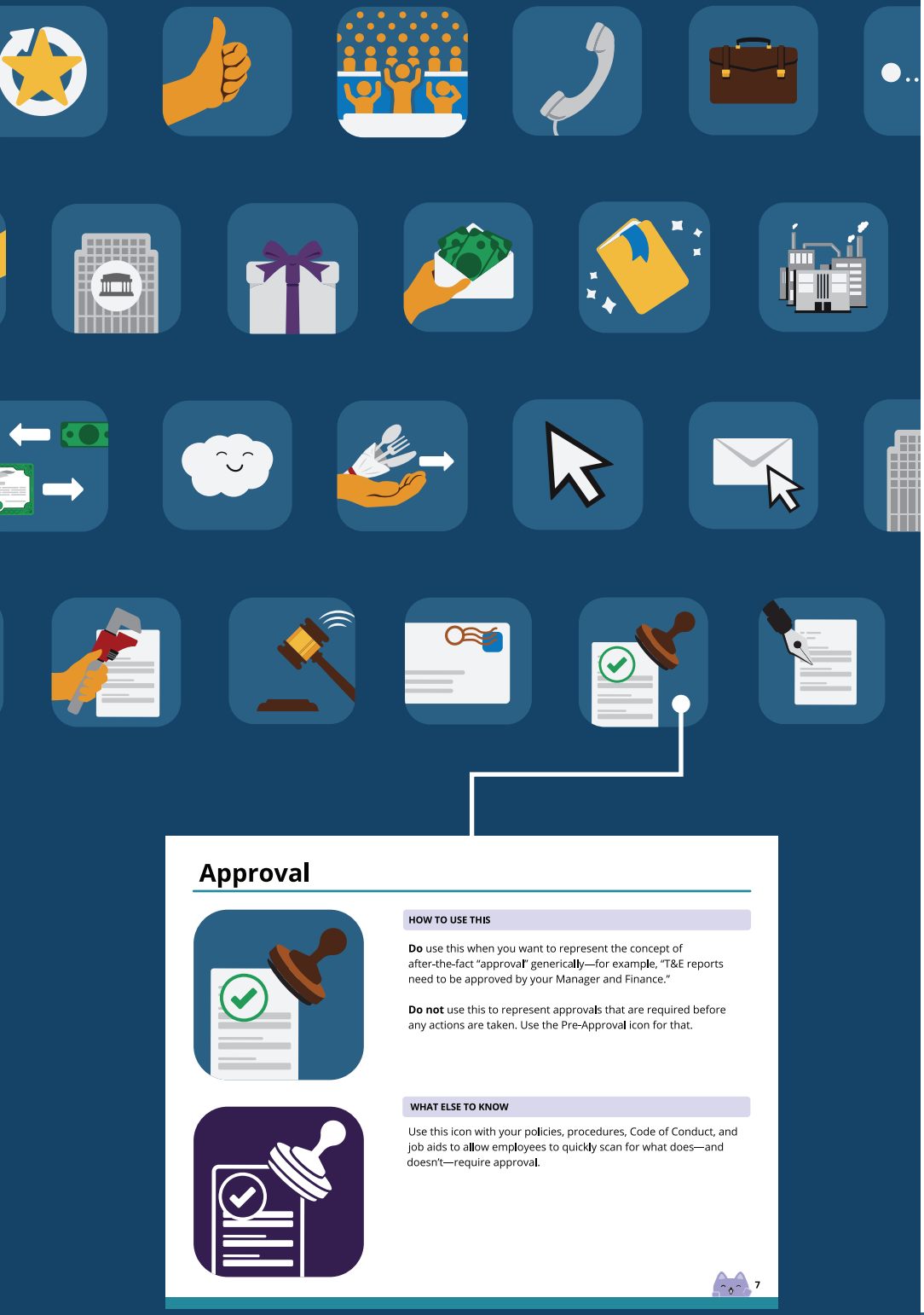
It's way too much to cover in a little book. So why don't you try it out for free? Go to compliancedesignclub.com and download our FREE editable hotline posters. You won't believe how easy they are to customize.

Tools to make your life easier

We also create tools just for compliance teams to use.

Because we've got ex-in-house folks on staff, we know the parts of your job that suck up your time and distract you from getting out there with your employees—and we've handled them for you.

Turn the page to see how we can ease your pain.



Design System

First up, our design system—a tool that *Compliance Week* called "powerful stuff." It's a first for our industry, and it's only at Broadcat.

So what is it? Simply put: a visual language of icons with standardized meanings. And that's exactly how we use them in our products in Compliance Design Club.

This means that every time your employees see something with an icon that you've gotten from Design Club, they know what it means and what to do—because it's always used the same way. It's how we make our training modular, so you can mix and match risks and audiences and still keep everything crystal clear for your employees.

It's more than just a feature of our training and communications, though: it's a tool unto itself. You can drag and drop these icons into emails, newsletters, policies, procedures, and anything else you want.

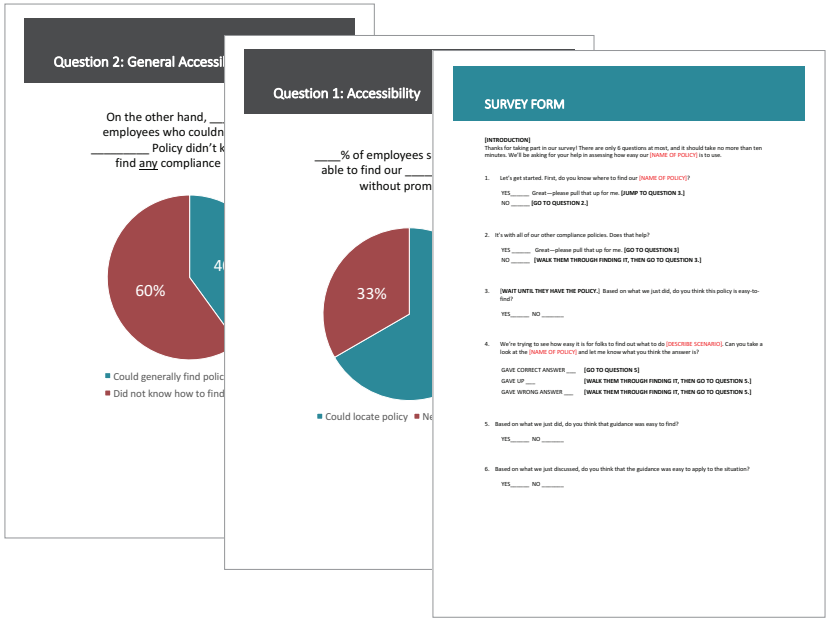
And the more you use them, the more you're setting up your compliance brand as consistent and trustworthy. Not only will your employees recognize what your communications mean, but they'll know, "This is from compliance, and compliance gives me things that are easy to understand."

And *that's* the compliance brand you want.

POLICY TEMPLATE



POLICY USABILITY GUIDE



Policy Design and Measurement

Training isn't the only element of a compliance program that we cover. Compliance Design Club has tools to make policies easier for you and your employees, too.

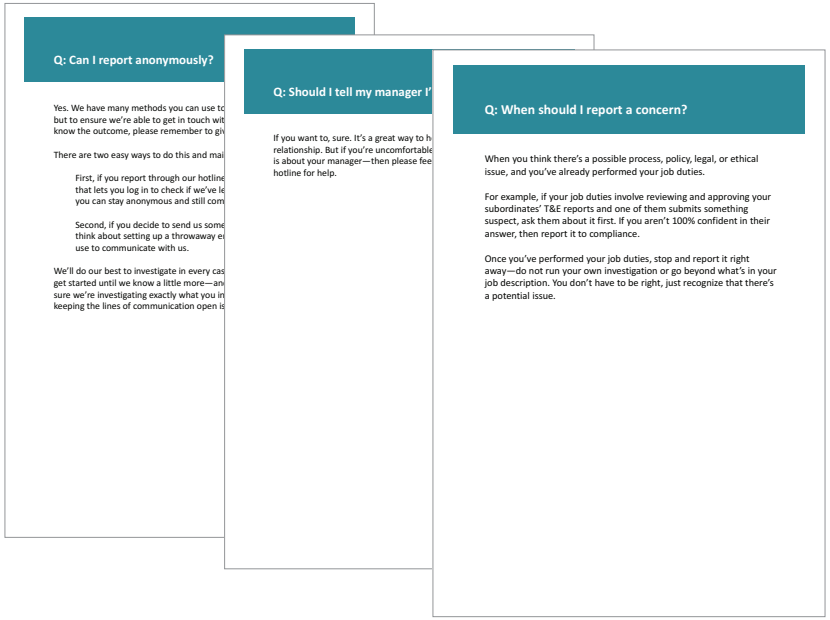
We've put together a policy template that follows familiar conventions, but leads off with a visual, one-page summary that's framed around how your employees actually think. It'll help you put yourself in your employees' shoes when writing the policy—and let your employees quickly scan for what's really relevant to them when they do need help.

But that's not all.

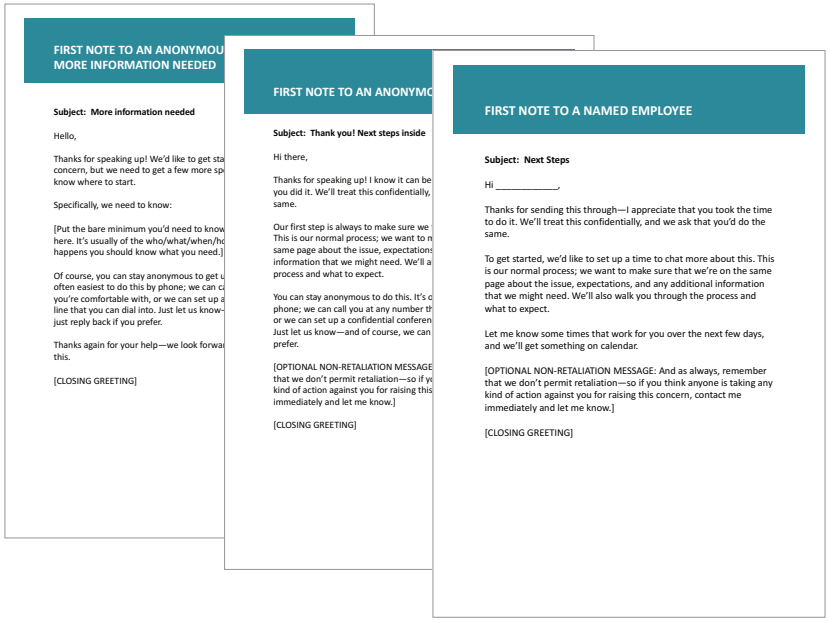
Because it's not enough to have policies; your employees have to understand them, too. And that means figuring out if they actually do that—instead of just waiting to see what comes through the hotline.

So we put together a template survey for you, complete with a turnkey report that spits out pie charts when you put in your data. It helps you get more value out of all the time you put in your policies—because it gives you confidence that your key employees actually understand what those policies require them to do.

FAQ TEMPLATES FOR YOUR HOTLINE



EMAIL TEMPLATES FOR COMMUNICATING WITH HOTLINE CALLERS



Hotline Management Tools

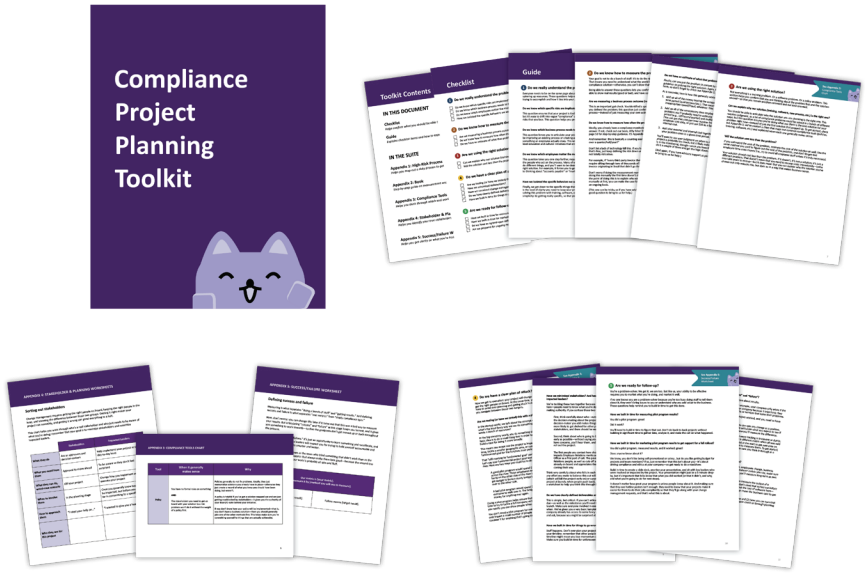
We've got all sorts of hotline resources for you, too—because we're led by a former in-house compliance investigator.

Do you want to encourage reporting, but feel like posters and speak-up messaging aren't doing the job? That's because those things just capture awareness—they don't answer the "but what happens next" questions that employees wrestle with before making the call.

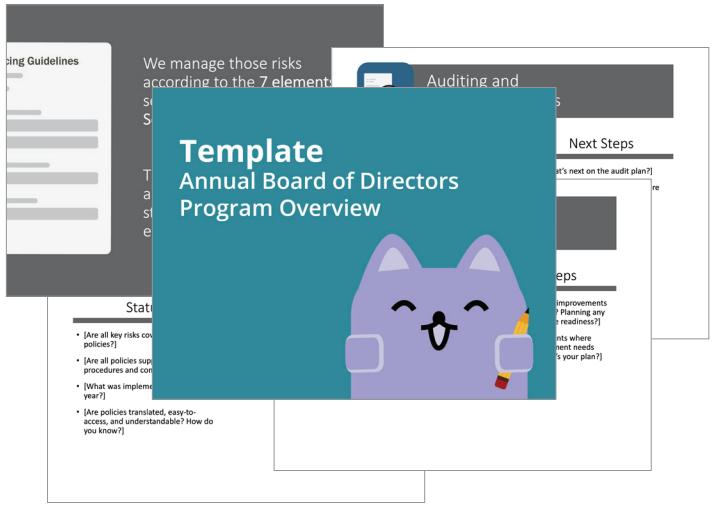
That's why we crafted hotline FAQs that answer those questions—so employees don't waver on a report because they're not sure what happens next. They're ready to be cut-and-pasted into your intranet or hotline site.

And when your hotline does ring, do you ever struggle with crafting *just* the right response to a caller—one that balances transparency and privacy, encouraging the caller without fostering gossip or giving your lawyers a panic attack?

We've got you covered there, too: tons of template emails for every stage of an investigation, with variations for both anonymous and named callers—and every email sounds like a human wrote it.



ANNUAL BOARD OF DIRECTORS PROGRAM OVERVIEW TEMPLATE



Easy-to-use planning tools and templates

Compliance isn't just training and investigations—you've got to be a jack- (or jill-) of-all-trades, too. So whether you need to project manage or report your results, we've got you covered.

First up is our compliance project planning toolkit. This isn't for little day-to-day decisions; this is for critical projects and thinking through how you'll show measurable value to your business.

This six-part kit includes everything from a high-risk process map to a breakdown of compliance solutions. The entire thing was built to make sure you're maximally effective—and that your business knows it, too.

You also need to report your results to your Board of Directors. But how do you give your annual status check without getting mired in the weeds of day-to-day details?

Simple: frame everything around the elements of a compliance program under the Federal Sentencing Guidelines. And our annual Board of Directors template slides do exactly that.

These editable slides are pre-populated with graphics and suggested content so you can keep your board focused on the stuff that matters—program structure and oversight—while presenting in an easy-to-understand way.

Ultra graphic awareness materials

Designed to work seamlessly with our other operational tools and training in Compliance Design Club, our killer posters and screensavers are effective, eye-catching, and engaging. Who knew your job could be this fun?


This is business travel.
We reimburse for this.
You can't change their mind...
Find gum on the ground?
DON'T PUT IT IN YOUR MOUTH
Find a USB on the ground?
DON'T PUT IT IN YOUR COMPUTER
Found devices are a security risk
NEVER USE THEM
for our
Conduct?
PROTECT YOUR
DATA
www.friendlyco.com
www.friendlyco.co
www.friendlyco.us
LOOK AT THE
EXTENSION
BEFORE YOU CLICK
SHRED IT
KEEP IT CONFIDENTIAL


Social media can kill context
Think twice before you share.
@TotallyLovesCats16
I seriously hate my cat.
#TryingToWork
The Popular News Blog
EMPLOYEE HATES CATS
Company fires cat-hater immediately
THIS HALLOWEEN
YOU ARE PROTECTED
LOTS OF PEOPLE PAY BRIBES
THEY'RE CALLED
CRIMINALS
IT'S A CONFLICT OF INTEREST
WORK VS PERSONAL
PRESENTED BY YOUR ETHICS & COMPLIANCE TEAM • WORKING TO PROTECT THE COMPANY AND YOU • REACHABLE 24/7, 365

Let's rock and roll.

So, moment of truth: are you ready to give up on e-learning fads and corny videos to get serious about what your business actually does?

And are you ready to stop viewing training as an add-on and integrate it into how employees do their jobs?

And are you ready to stop using lame metrics and embrace real measurement so that you can show results that make business sense?

Because your business is beyond ready for that.

Time to join Compliance Design Club. It'll change your compliance program forever.

Compliance Design Club:
get effective and engaging training and communications
that are a breeze to customize.



Try it for free!

thebroadcat.com/hi-there