

2017 Ethics & Compliance Training Benchmark Report

Data and Insights to Get More Value from Your Program



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INTRODUCTION

In 2017, NAVEX Global partnered with an independent research firm to survey ethics and compliance (E&C) professionals from a range of industries on their approach to E&C training.

The findings represent responses from 929 respondents. (See respondent profile in the next section for additional details.)

This report provides insights and analysis of E&C training questions such as:

- » What approaches do organizations take?
- » What challenges do organizations face?
- » How do organizations measure effectiveness?
- » What outcomes or benefits do organizations realize and what influenced them?
- » What activities are priorities for organizations?

How to Use This Report

Many organizations have compliance training programs in place today. In most cases, these programs are pursued to both protect their organization and to help build a culture of ethics and respect. Yet, many programs are challenged by a lack of budget and resources, often as a result of the difficulty program leaders and administrators have demonstrating the value of a training program. When faced with increasing demands for training despite limited resources, demonstrating the value of program performance is critical.

This report will help you:

- » Assess the quality and effectiveness of your own training program, and whether your program is protecting the organization or leaving it at risk
- » Evaluate your program against peers and discover ways for it to mature
- » Benchmark your training program against industry norms and best practices
- » Leverage data and recommendations to improve your program effectiveness

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

What Is Ethics and Compliance Training?

For the purposes of this analysis, unless specified, “ethics and compliance training” includes regulatory compliance, code of conduct, employment law, and information security training. Topics as diverse as workplace harassment, wage and hour, code of conduct, cyber security, and anti-bribery and corruption all fit within this broad definition. Further, this definition includes all forms of training on ethics and compliance topics such as online, in-person, virtual and blended training approaches.

TRUST NAVEX GLOBAL'S
ETHICS & COMPLIANCE
SOLUTIONS

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



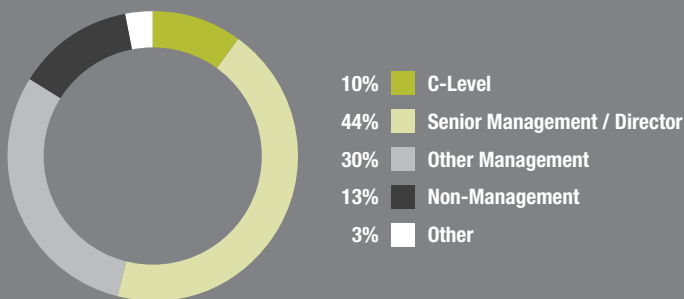
SURVEY RESPONDENT PROFILE

N=929

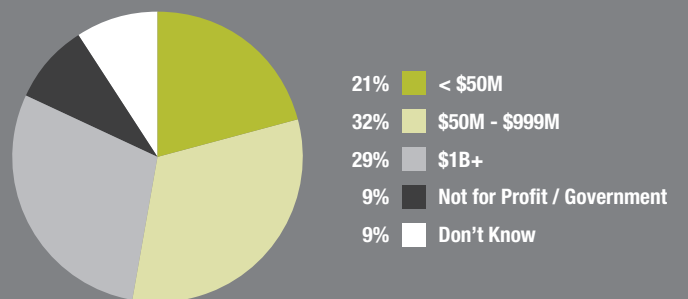
Job Function



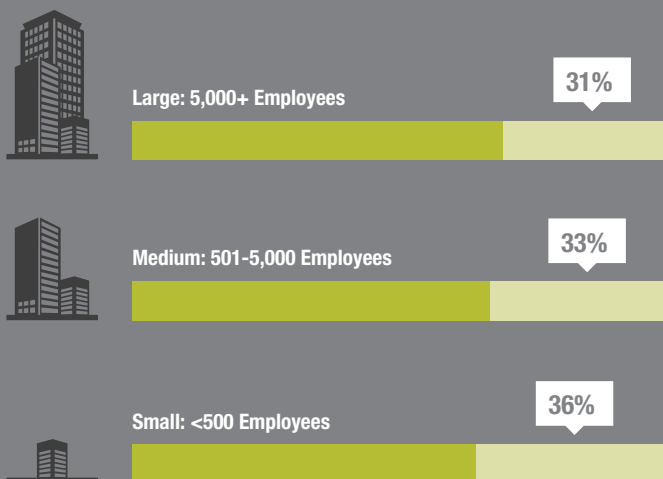
Job Level



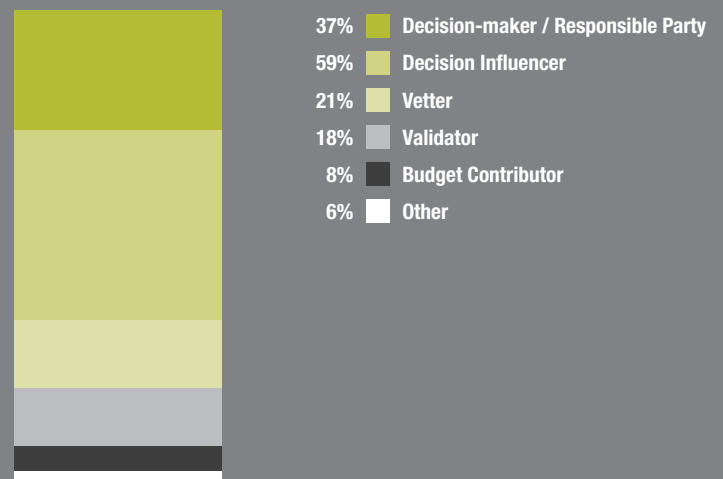
Company Annual Revenue



Company Size



Purchasing Role





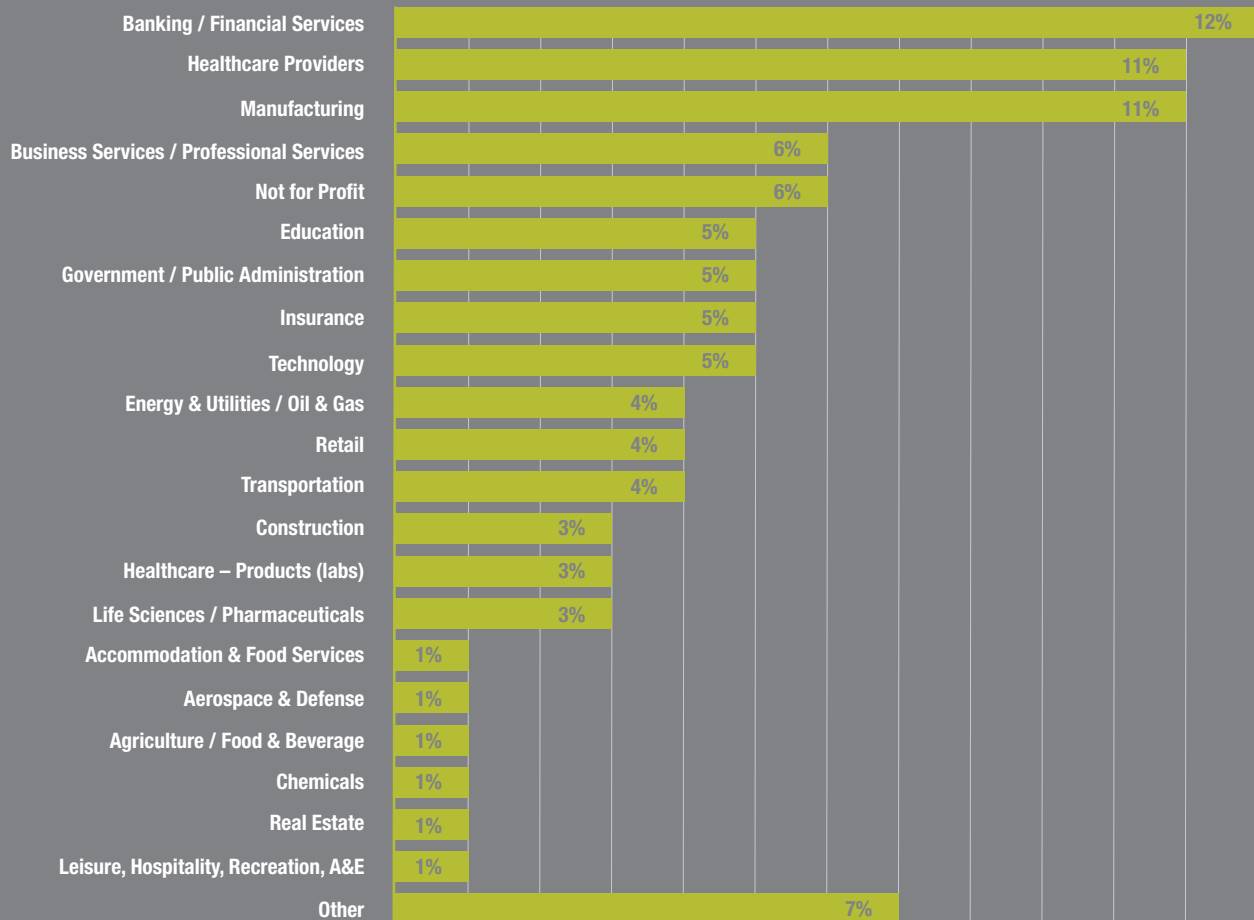
Regions Where Respondents Conduct E&C Training

United States	89%	Middle East	16%
Europe	29%	Australia / New Zealand / Pacific Islands	14%
Asia	24%	Africa	12%
Latin America	20%	Caribbean	7%
Canada	20%		

Location of Headquarters

North America	83%
Europe	10%
Asia Pacific	3%
South America	2%
Middle East / Africa	2%

Industries



Note: Totals may be over 100% due to multiple selection options

EXECUTIVE SUMMARY

This is the fourth year NAVEX Global has published a market benchmark report on the state of ethics and compliance training. Each year, new insights and a few surprises are revealed.

This year's survey was designed to expand upon a core set of questions we've asked in previous years to create benchmarks for your program. For the second time, we have expanded our analysis on the benefits of program maturity to help your organization justify resource allocation (both time and money) to drive program improvements. Our research continues to show that mature, well-run programs drive higher performance and improved outcomes. When organizations commit resources to and assign structure to their ethics and compliance programs, there is a positive relationship between investment and outcomes. In addition, including organizational executives and boards in training strategies is critical to program success; it represents a best practice and improves the effectiveness of your program.

The following key themes are considerations for this year's analysis:

- » **Compliance is in the news.** Compliance missteps have dominated news cycles this past year. Both household brands and market newcomers are finding their programs and efforts to curb misconduct under an often intense and critical spotlight. Add in social media's ability to reach millions and you have an operating environment that is less forgiving and more demanding for ethics and compliance professionals. Failed efforts and poorly run programs (including low-quality training) quickly become fodder for the news cycle and put uninvited pressure on your program. The best organizations are not just focusing on culture and regulatory

compliance, but also considering how their efforts will fare under the scrutiny of the public eye.

- » **Compliance replaces culture as the top training objective.** For the first time since this benchmark report has been published, "complying with laws and regulations" is the most important ethics and compliance training objective (59% selected this as one of their top three objectives) followed by "creating a culture of ethics and respect," the second-most important objective at 57 percent. However, culture remains more important to organizations with *Mature* or *Advanced* E&C practices. Also worthy of note, "preventing future issues or misconduct" has become a higher training priority compared to the previous year (39% in 2017 vs. 28% in 2016).
- » **Culture of ethics and respect is defined in various ways.** The most common perception is that a culture of ethics and respect encourages people to speak up and is aligned with regulatory requirements and guidelines. Larger and more mature organizations are more inclined to believe that a culture of ethics encourages people to speak up whereas small and medium organizations are more likely to define it as an alignment with regulatory guidelines. "Training, coaching and awareness efforts," "intolerance of unethical behavior," "executive buy-in and leading by example" are the top strategies that organizations employ to pursue a culture of ethics and respect.
- » **Doing more with less.** Compliance professionals continue to be asked to do more with less. They are asked to cover more risk areas, expand the reach of their program,

be more creative with what they are doing, and advance their programs, with budgets that are flat or experiencing only incremental adjustments. This requires ratcheting up planning, organization, management and measurement. Limited training time, more courses, additional dimensions and more risk areas can strain even the most efficient programs and require greater creativity and structure. However, there is some good news as a higher proportion of small businesses anticipate an increase in their budgets compared to the previous year (26% in 2017 vs. 12% in 2016). These organizations are likely outgrowing their basic programs and prioritizing improvements.

General employee ambivalence, such as “learner fatigue,” “training is not seen as relevant or useful,” “training is not seen as effective at changing attitudes or behavior,” and “a lack of executive buy-in” creates additional challenges. Solving for these challenges will require organizations to demonstrate the benefits of training in order to increase employee buy-in and secure additional resources. Organizations are clearly at a tipping point. To succeed in this new environment, greater program sophistication is an essential next step for all programs as well as an increased awareness around the needs of learners.

- » **Significant gaps still remain with respect to board training.** Board training is an important aspect of an effective ethics and compliance program. In order to conduct effective oversight, directors must have an understanding of the potential risks. Despite this, fewer organizations provided training to their board members in 2017 (44% in 2017 vs. 58% in 2016). Only 17 percent of new

directors received training, leaving 4 out of 5 without an important opportunity to learn about the ethics and compliance values of the organization. And despite the ever-present risk of cyber security loss, only one-quarter of organizations cover this critical risk area with boards. Failing to educate directors about key risks and program features is a major program vulnerability.

- » **Measuring effectiveness remains elusive for most organizations.** Most organizations today want to demonstrate the effectiveness of their training efforts and the return on their investment. However, methods used are ineffective at best. Rigorous methods, such as referring to data from ethics hotlines or measuring changes in behavior, are practiced by fewer than one-third of organizations. Only 7 percent of organizations attempt to show a return on investment from their E&C training. Implementing more sophisticated methods to assess training effectiveness and ROI will help demonstrate the usefulness of E&C programs and increase executive buy-in.

KEY FINDINGS



1: The State of Ethics & Compliance Training Today

What Are the Top E&C Training Objectives?

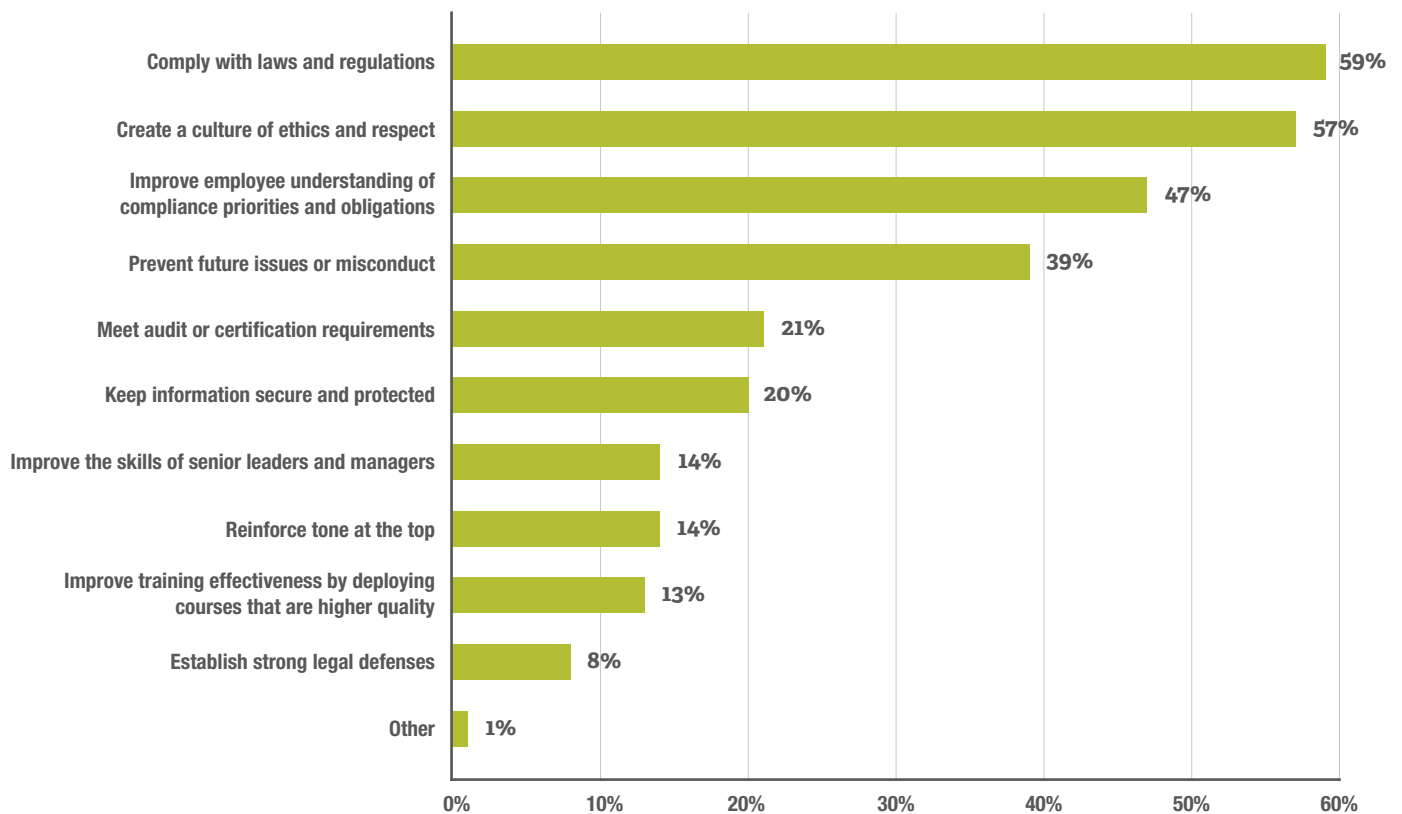
Findings: Our survey revealed two primary motivations for organizations pursuing ethics and compliance training: complying with laws and regulations (59%) and creating a culture of ethics and respect (57%). Improving employee understanding of compliance priorities and obligations was the third-most important objective (47%).

- » Culture remains a top program driver, but complying with laws and regulations takes

top spot by a very narrow margin. However, complying with laws is more important to small and medium organizations with (63% of organizations with 5,000 or less employees) than it is to larger organizations (53% of organizations with 5,000 or more employees).

- » Creating a culture of ethics and respect is more important to organizations with *Mature* or *Advanced* (see page 15 for maturity analysis) E&C practices (61% and 62%, respectively) than it is to organizations with less mature practices (53% of *Reactive* and *Basic* organizations).

What Ethics & Compliance Training Objectives Are Most Important to Your Organization Today? (Respondents Select Their Top 3 Objectives)



Base: All respondents, n=929. Multiple responses possible.

The State of Ethics & Compliance Training Today Continued

Analysis: For the first time in the four years of this report, creating a culture of ethics and respect is not the top training program objective. Complying with laws has taken a slight lead, although both remain top priorities. The shift in program objectives may be influenced by factors such as external and internal pressure to prevent compliance missteps (which can result in significant reputational and financial harm); this objective increased in importance (28% in 2016, to 39% in 2017).

As noted in the findings above, complying with laws and regulations is more important to small and medium organizations with less mature programs than to large organizations and those with mature programs. This may indicate a first-things-first approach to prioritizing essential compliance requirements, before focusing on cultural issues. Also, large organizations and those with well-established programs tend to appreciate the strong link between culture and compliance, and are actively pursuing culture changes as part of their program.

How Do Organizations Define a Culture of “Ethics and Respect”?

Findings: Organizations define a culture of ethics and respect in various ways. The two most common definitions highlight a culture that creates a workplace that encourages people to speak openly and aligns with regulatory requirements and guidelines.

- » Large organizations are more likely than small organizations to define a culture of ethics and respect as one that encourages employees to speak up (56% vs. 40% of small organizations). Organizations with higher maturity levels (see page 15 for maturity analysis) are also more inclined to use this definition (55% of *Advanced* and 53% of *Mature* vs. 37% *Basic* and 27% *Reactive*).
- » Small and medium organizations are more likely to define it as alignment with regulatory guidelines (42% vs. 34% of large organizations).
- » Large organizations are more inclined to indicate a commitment to shared values as defining a culture of ethics and respect than small organizations (41% vs. 31%). Small organizations are more inclined to define it as an environment free of toxic behaviors (35% vs. 24% of large organizations).

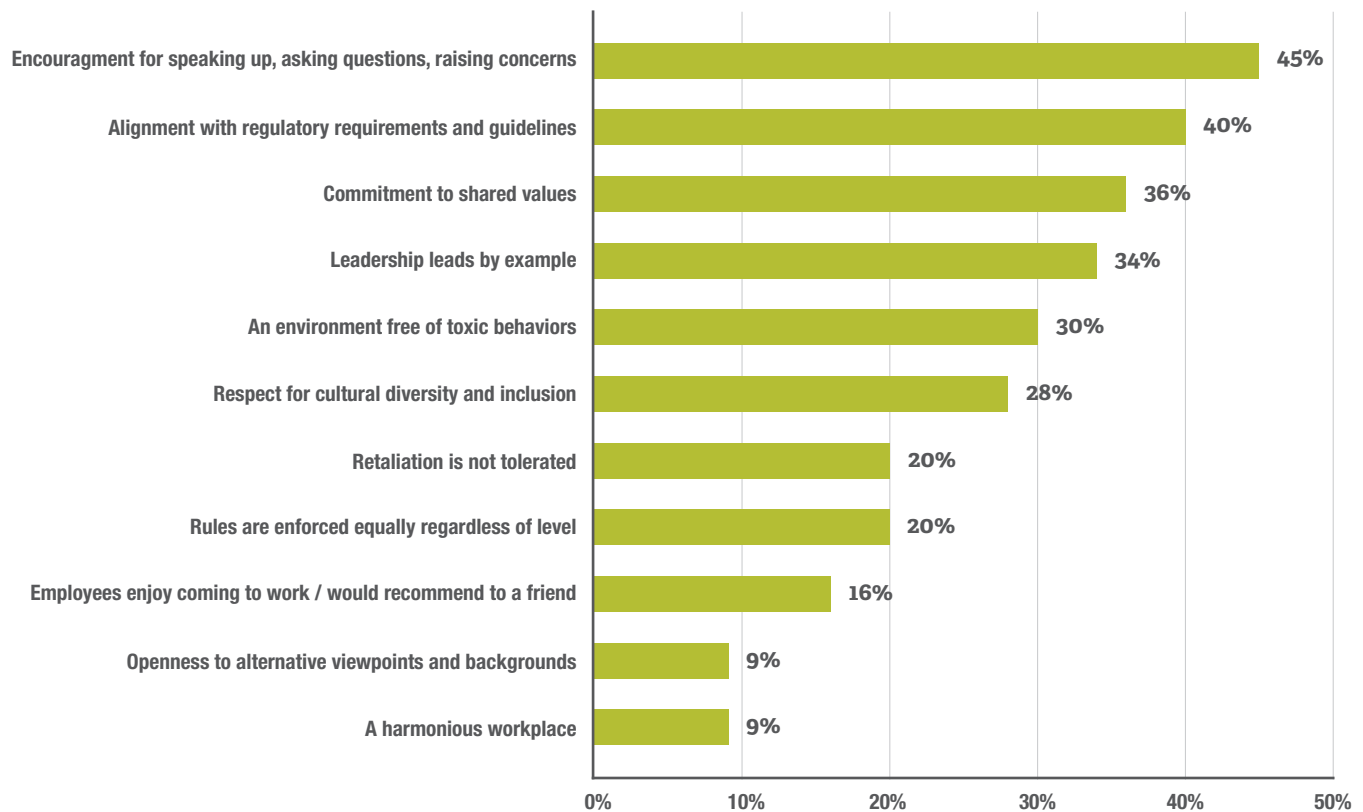
The State of Ethics & Compliance Training Today Continued

Analysis: The data reveals that there is no strong alignment between what is meant by “culture of ethics and respect” with many different variables having almost equal footing. An ideal culture of ethics and respect would be one in which employees feel empowered to speak up (at 45%); there is a respect for diversity (at 28%); there’s no fear of retaliation (at only 20%); it’s free of toxic behaviors (at 30%); and leadership provides great role models for the organization (at 34%). Surprisingly, the second most popular definition is alignment with regulatory requirements (at 40%). While the phrase can mean different things to different organizations, the diversity

of responses suggests that even within one organization there may not be alignment on this key program objective. Additional awareness and communication may be necessary about what this phrase means if an organization wishes to advance this important objective in coming years.

Anti-retaliation concerns are lower than we expected at 20 percent, particularly due to the implications of failing to make all employees aware of an organization’s anti-retaliation policies. There are few conditions that can harm an organization’s cultural reputation worse than reports of retaliation.

How Does Your Organization Best Define a Culture of Ethics & Respect? (Respondents Selected up to 3 Choices)



Base: All respondents, n=929. Multiple responses possible.

The State of Ethics & Compliance Training Today Continued

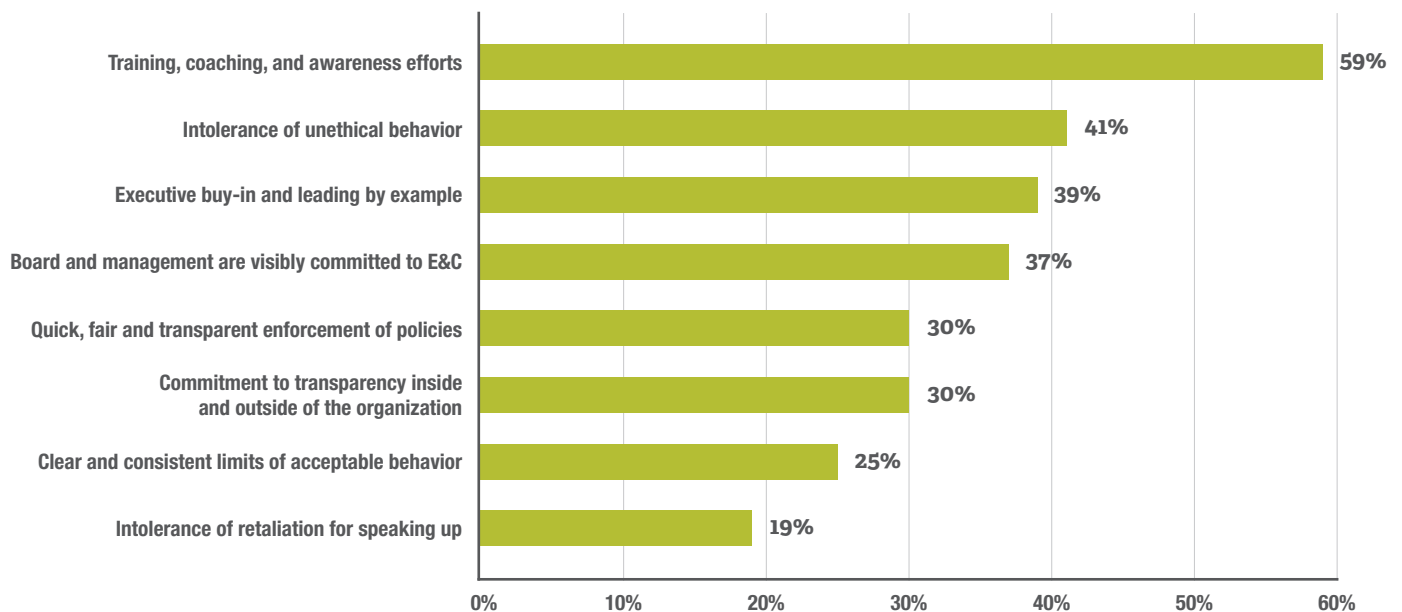
How Do Organizations Pursue a Culture of “Ethics & Respect”?

Findings: Despite a lack of cohesiveness on how the phrase is defined, when it comes to pursuing a culture of ethics and respect there is consensus on how to do it. Training, coaching and awareness efforts come out on top.

- » In terms of pursuing a culture of ethics and respect, more mature organizations are more inclined to mention training and awareness efforts than less mature organizations (71% of *Advanced*, 61% of *Mature* vs. 52% of *Basic*, 57% of *Reactive*).

Analysis: Education and training are positive activities that organizations can take to change culture, employee behavior, and employee understanding of the regulatory and legal environment in which the organization operates. This data demonstrates that most organizations view education programs as a clear pathway to make a difference and see results. However, to be effective, training must be carefully selected or created. Training efforts that are not relevant to employees’ work, or that are low quality and lack engagement can backfire on an organization. Negative side effects that flow from poor quality training include increased levels of cynicism, a lack of behavior change, and a lack of engagement.

What Do You See as the Most Important Ways Your Organization Pursues a Culture of Ethics & Respect?



Base: All respondents, n=929. Multiple responses possible.

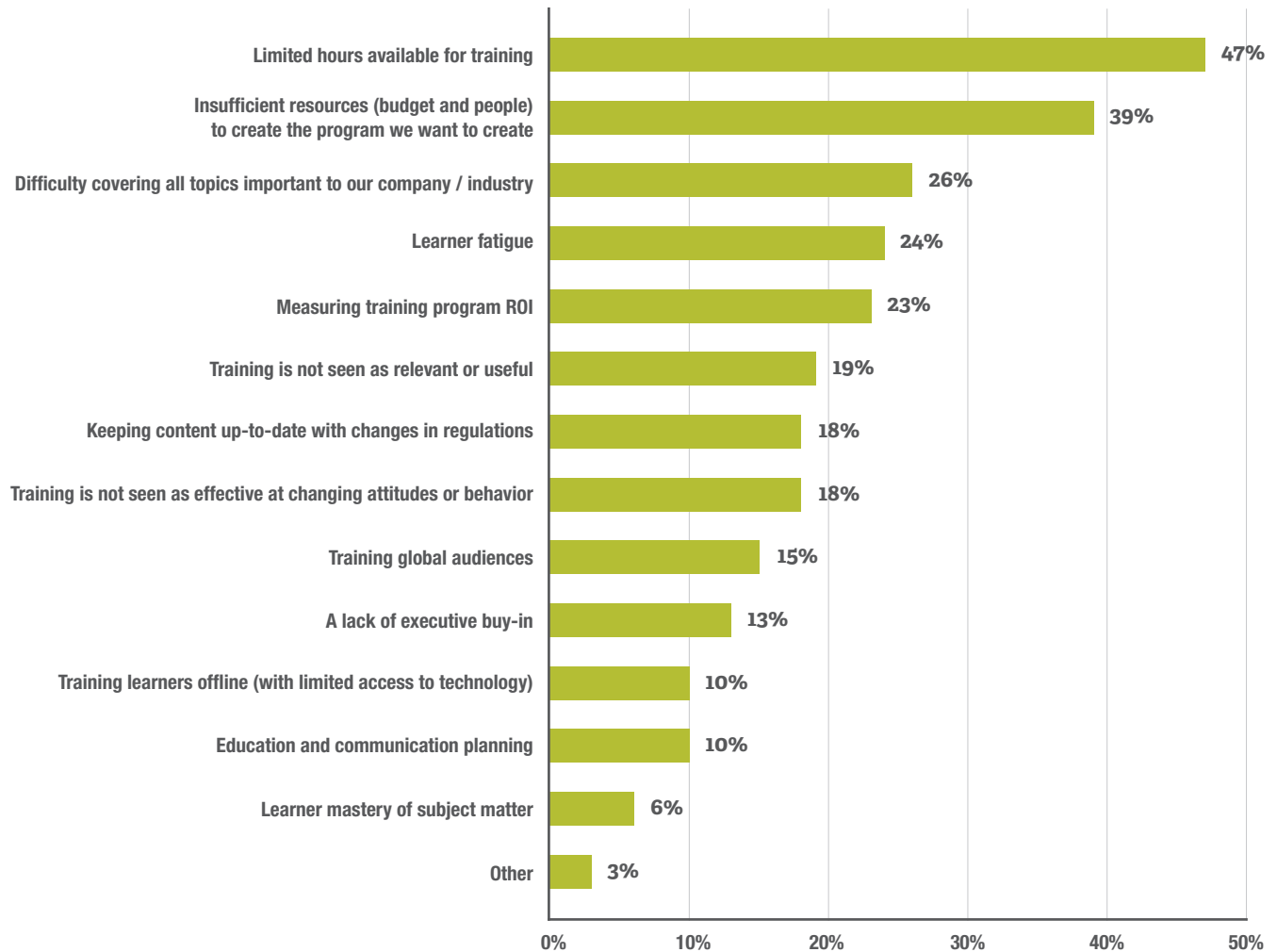
The State of Ethics & Compliance Training Today Continued

What Are the Top Ethics & Compliance Training Program Challenges?

Findings: Limited time for training and insufficient resources are the top challenges facing

organizations today. Keeping content up-to-date with changes in regulations was the second-most mentioned challenge in 2016 (36%), but the addition of the category “insufficient resources” in 2017 may have displaced its relative importance as it’s likely that this type of challenge stems from a lack of resources.

What Are the Top 3 Challenges to Your Organization When It Comes to Ethics & Compliance Training?



Base: All respondents, n=927. Multiple responses possible.

The State of Ethics & Compliance Training Today Continued

- » Learner fatigue is a greater challenge among large organizations than amongst small and medium organizations (32% vs. 21% of small and medium organizations). Training global audiences was also more often mentioned as a challenge among large organizations (30%, compared to only 8% of small and medium organizations).
- » A lack of executive buy-in is a greater challenge among organizations with *Reactive* E&C training programs (26%), compared to organizations with *Basic* programs (15%), *Maturing* (9%) or *Advanced* (8%).
- » Organizations with higher employee turnover are more likely to cite a lack of resources as a top challenge. Forty-five percent of organizations with an annual turnover rate of 15 percent or greater indicate insufficient resources to create the program they want. This is compared to 33 percent of organizations with moderate turnover (6-15% annually) and 35 percent of organizations with low turnover (5% or less annually).

Analysis: Basic challenges continue to hamper the success of training programs. Unfortunately, the challenges that are most daunting for respondents have persisted since our survey was first conducted four years ago. Limited hours available for training continues to be the top challenge. Combined with insufficient resources, too many demands on their program, low levels of executive buy-in and limited budget, compliance professionals need to rethink the way they are approaching their training programs if they want to overcome these persistent challenges.

A few critical steps to consider taking include (1) improve program planning to better stretch training budgets and allocate resources more effectively, (2) add new training formats to the mix of offerings, and (3) improve overall effectiveness measurement to secure enhanced budget and or seat time. As this report shows, high performing program leaders often make the best use of limited budgets and hours through innovative scheduling and mixing topics and course lengths.

Organizations should be more concerned with learner fatigue (1 in 4 organizations) and lack of relevance of training (1 in 5 organizations). Both of these challenges, if not properly resolved or addressed, can undermine training efforts. Organizations can address these challenges while selecting or creating training by ensuring that the training is not just check-the-box but rather is engaging, relevant and powerful.

The State of Ethics & Compliance Training Today Continued

How Mature Are Ethics & Compliance Training Programs?

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

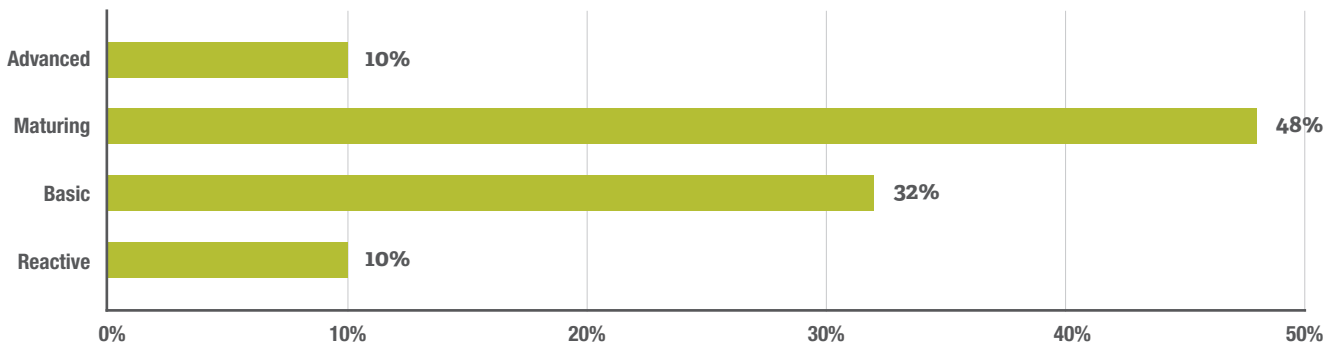
- » *Reactive:* Address issues as they arise with no formal plan (10% of organizations)
- » *Basic:* Train on basic topics only (32%)
- » *Maturing:* Have a basic plan for the year that covers a handful of topics with limited risk and role-based topic assignments. Effectiveness measures are limited to completion rates and qualitative feedback (48%)
- » *Advanced:* Have a sophisticated multiyear training plan that covers a variety of topics assigned to specific audiences based on need and risk profile that includes live

and eLearning, short-form and long-form courses and a variety of engaging formats. A disciplined approach to reporting and measuring training effectiveness that focuses on training outcomes (10%).

These proportions remain virtually unchanged from 2016 findings.

Not surprisingly, level of maturity is often related to organizational size, with 55 percent of small organizations classified as *Basic* or *Reactive*, although 38 percent of these would consider their training program *Mature*. Medium-sized firms tend to classify their program as either *Basic* (34%) or *Maturing* (50%). Large organizations tend to consider their program *Mature* (58%) or *Advanced* (16%), however 1 in 5 large organizations consider their program more *Basic*.

Choose the Option that Best Describes Your Organization's E&C Training Program.



Base: All respondents, n=896.

The State of Ethics & Compliance Training Today Continued

Analysis: For the second year, we see training programs maturing slowly even when they have been in place for many years. Even though training spend often represents the largest non-salary budget item for compliance and HR functions and E&C programs benefit from their structure and formality, only 10 percent of respondents meet the criteria of an *Advanced* Program and 48% are *Maturing*.

Over 40 percent rate their programs as *Basic* or *Reactive*. In today's enforcement environment, these programs are likely to face heightened scrutiny and are not likely to experience the program benefits of more mature programs. *Reactive* and *Basic* programs must analyze and apply the program elements of *Maturing* and *Advanced* programs to improve their effectiveness.

As you will see in this report, much of the data analysis we've completed takes into account program maturity as a contributory factor in program approach and performance. It is important to note that many of the criteria for *Advanced* and *Mature* programs are based on structure and strategy and not directly correlated to the total dollars available for the program.

What Are the Overall Training Activities?

Findings: The top training trend is assigning courses based on learner role or risk, which increased to 52 percent in 2017 from 39 percent in 2016. This was followed by developing a multiyear training plan, also increasing to 40 percent in 2017 from 34 percent in 2016. Also up slightly from 2016 is online or collaborative, or social learning, (to 22% from 14% in 2016).

- » Over half (52%) of all organizations are assigning courses based on learner role or risk
- » *Advanced* organizations are more likely to be assigning courses based on risk (76% vs. 27% *Reactive*) and applying multiyear training plans (59% vs. 33% *Reactive*)
- » *Mature* and *Advanced* programs are more likely to include enhancements such as micro learning (26% and 29%, respectively), social learning (24% and 40%), and gamification (14% and 26%) in their learning programs
- » *Advanced* programs conduct a greater number of training activities, with 35 percent indicating they conduct five or more different training activities (compared to 16% of *Mature* programs, 4% of *Basic* programs, and 8% of *Reactive* programs)

Analysis: This year's survey results show some interesting shifts in the trends that organizations are tackling. And all of the top trends fit squarely into the category of doing more with less, and improving the experience for the learner. The two trends with the most significant increase in

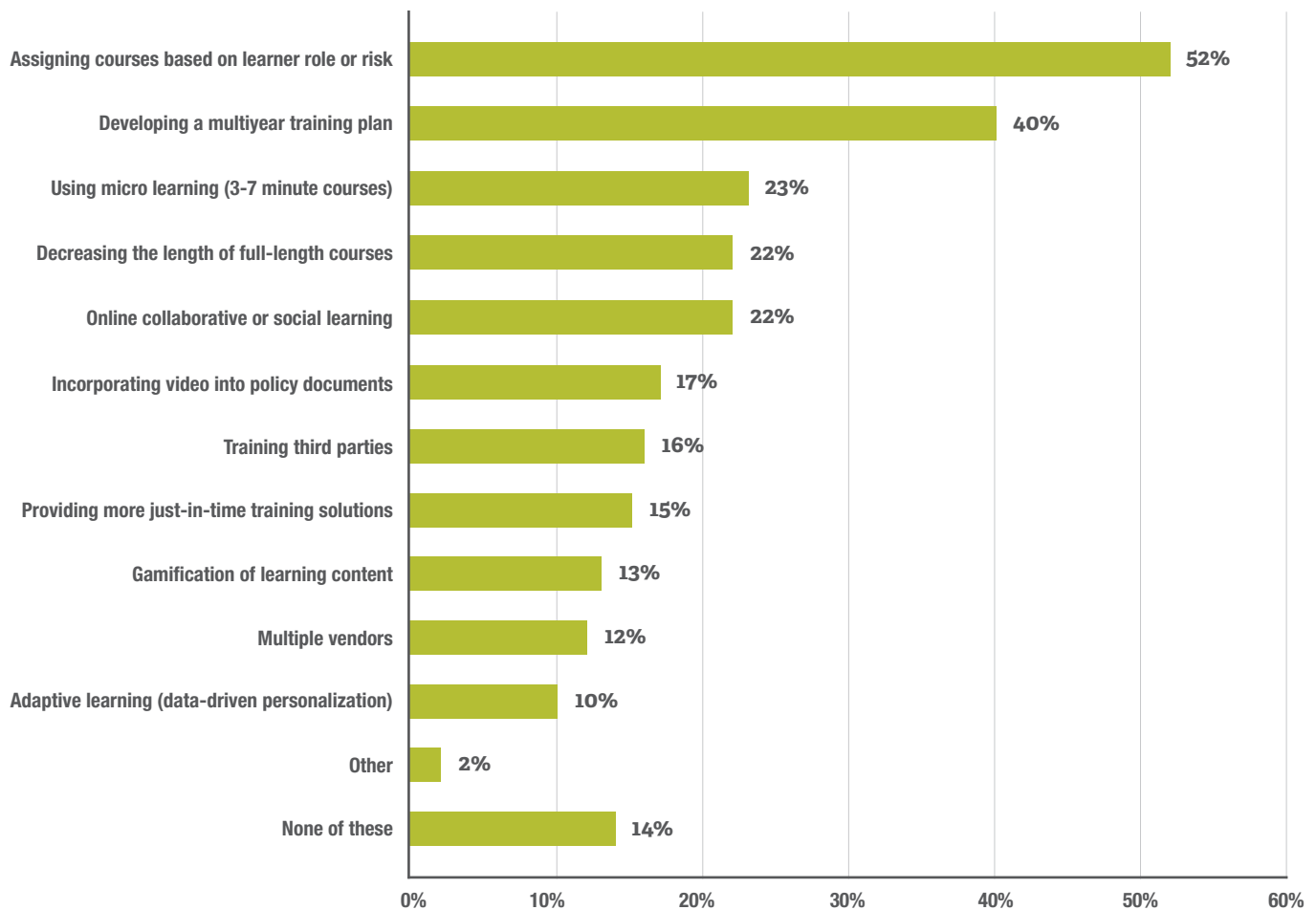
The State of Ethics & Compliance Training Today Continued

adoption rate are (1) assigning courses based on learner role or risk and (2) developing a multiyear training plan. Both activities are incredibly important and are characteristics associated with advanced programs.

Size of the organization, complexity of the training initiative and maturity of the training program impact adoption rates of these important trends. Large and medium organizations are more likely to assign courses based on learner role or risk (62%

and 52%, respectively) than are small organizations (43%). Also, organizations that plan on covering 10 or more training topics over the next 2-3 years are more likely to have a structured, multiyear training program in place (50%) than organizations that plan on covering fewer than 10 topics (33%). Similarly, organizations that plan on covering 10 or more training topics over the next 2-3 years are more likely to assign topics based on learner role or risk (67%) than organizations that plan on covering fewer than 10 topics (42%).

Which of the Following Ethics & Compliance Training Activities Are You Currently Applying in Your Organization?



Base: All respondents, n=929. Multiple responses possible.

The State of Ethics & Compliance Training Today Continued

Training Activities by Maturity Level

	Reactive	Basic	Maturing	Advanced
Assigning courses based on learner role or risk	27%	37%	62%	76%
Developing a multiyear training plan	33%	29%	46%	59%
Using micro learning (3-7 minute courses)	15%	21%	26%	29%
Decreasing the length of full-length courses	8%	16%	27%	39%
Online collaborative or social learning	11%	16%	24%	40%
Incorporating video into policy documents	9%	15%	19%	25%
Training third parties	8%	9%	21%	25%
Providing more just-in-time training solutions	18%	12%	16%	17%
Gamification of learning content	7%	7%	14%	26%
Multiple vendors	5%	8%	15%	23%
Adaptive learning (data-driven personalization)	11%	5%	11%	20%

Number of Training Activities by Maturity Level

	Total	Reactive	Basic	Maturing	Advanced
Conduct 5 or more activities	14%	8%	4%	16%	35%
Conduct 4 activities	14%	8%	11%	14%	17%
Conduct 3 activities	24%	16%	22%	27%	26%
Conduct 2 activities	24%	20%	25%	25%	12%
Conduct 1 activity	25%	48%	37%	18%	11%
Mean number of activities	2.9	2.3	2.2	3.1	3.9
Median number of activities	3.0	2.0	2.0	3.0	4.0

Note: Excludes organizations that indicate they do not apply any training activities.

The State of Ethics & Compliance Training Today Continued

What Undermines Training Success?

Findings: About three-quarters of respondent cite concerns that undermine E&C training in their organizations, with employee cynicism, supervisors that downplay complaints, lack of disciplinary measures, and employees that are afraid to speak up as top issues.

- » Mature organizations were less inclined to mention lack of communication by leadership as an issue in training and awareness efforts than less mature organizations (18% of *Advanced*, 19% of *Mature* vs. 30% of *Basic* and 28% of *Reactive*).
- » They are also less likely to indicate a lack of disciplinary measures (14% of *Advanced*, 23% of *Mature* vs. 30% of *Basic* and 29% of *Reactive*).

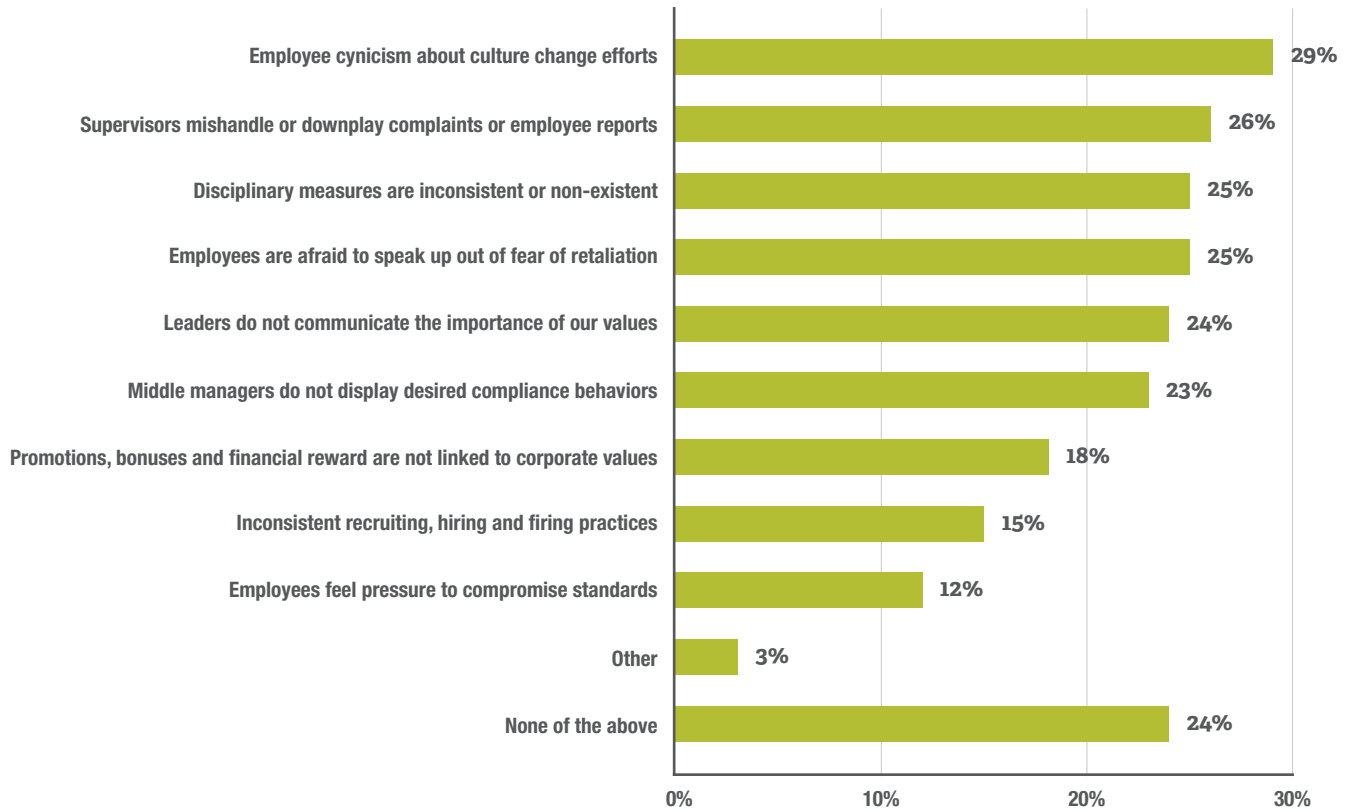
Analysis: Making an investment in employee training can be a big financial commitment for an organization, but even more significant is the management time and learner seat time that is

consumed when a program is rolled out. If the efforts are wasted because the program is not effective or supported, or employees are not engaged, the true cost of training goes well beyond the amount paid for the course itself. For a training program to be successful, compliance professionals must focus on not only the quality of the training (selecting the best training they can) but also the culture of the organization and what changes are required to support an effective learning program.

Employee cynicism, supervisors that downplay complaints, lack of disciplinary measures, and employee fear of speaking up are top issues that undermine E&C training and must be addressed; more than 1 in 4 organizations cite these obstacles as impacting their organization, with many organizations citing more than one of these. Mature training programs are less likely to mention a lack of leadership or indicate a lack of disciplinary measures. Addressing these concerns, in addition to reinforcing E&C concepts through training, is key to improving culture.

The State of Ethics & Compliance Training Today Continued

Which of the Following Concerns Currently Undermine Ethics & Compliance Training in Your Organization?



Base: All respondents, n=929. Multiple responses possible.

The State of Ethics & Compliance Training Today Continued

How Prevalent Are Formal E&C Training Plans?

Findings: Just over a third of organizations (37%) do not have a formal compliance education plan in place. Among organizations that do (63%), half indicate their plan covers multiple years.

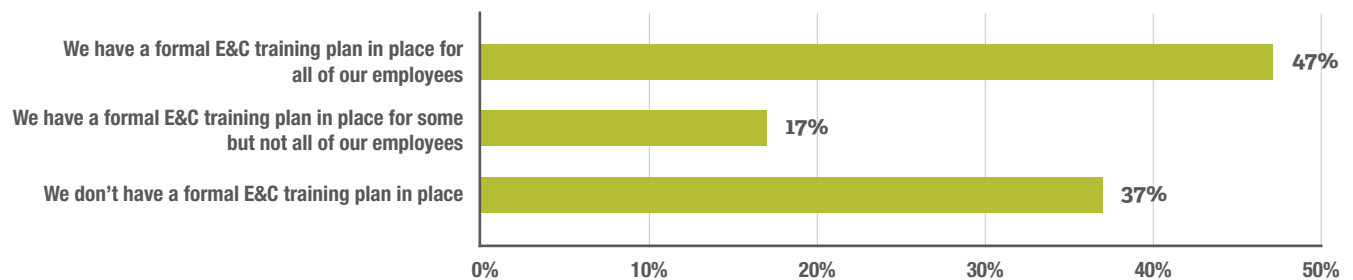
- » *Mature* and *Advanced* programs are more likely to have a formal compliance training program in place (56% and 84% respectively)
- » Organizations that intend to cover 10 or more topics in the next 2-3 years are more likely to have a formal plan in place (75%) than those planning to cover fewer topics (59%)

Analysis: An emerging and important trend that has not yet gained full market adoption is education planning. Multiyear education planning is critical to program success and is one of the most significant steps an organization can take to get better control over its program.

As we would expect, *Mature* and *Advanced* organizations have more formal training programs in place compared to *Reactive* organizations where 81 percent have no formal training program.

An education plan is the roadmap for your organization; it helps ensure that you are covering topics at the right level and right cadence, and provides your learners with predictability. Education plans must evolve as training evolves, which requires plans to be revisited. As organizations move to a more advanced model of education (one that allows learners to access content just-in-time), planning will remain important. Providing new and updated content as well as role-based access is becoming a key priority, while the spacing of content is becoming less critical. Those organizations that have either no plan, or a limited plan should make the creation of a robust education plan a key priority for 2017/2018. And while a one-year plan is a great start, organizations should strive to create a plan that covers 3-4 years.

Do You Have a Formal Ethics & Compliance Training Plan in Place?

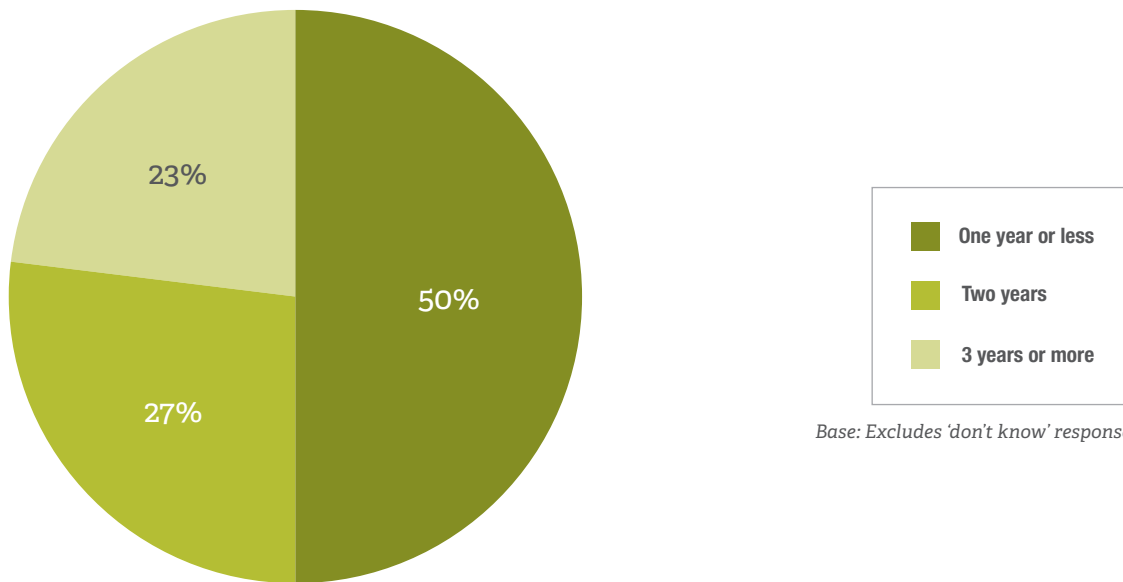


Base: Excludes 'don't know' respondents, n=882.

Training Plans by Maturity Level

	Reactive	Basic	Maturing	Advanced
We have a formal E&C training plan in place for all our employees	10%	33%	56%	84%
We have a formal E&C training plan in place for some but not all our employees	9%	14%	22%	7%
We don't have a formal E&C Training plan in place	81%	52%	23%	8%

How Many Years Does Your Formal E&C Training Plan Cover? (Organizations With a Formal Plan)



Base: Excludes 'don't know' responses, n=509.



2. Benchmark Ethics & Compliance Training

What Is the Dedicated Budget for E&C Training?

Findings: One-quarter of respondents indicate that their organization does not have a dedicated budget for ethics and compliance training, remaining unchanged from 2016. The proportion of organizations with smaller budgets (between \$1 and \$25,000) has increased to 46 percent in 2017 from 31 percent in 2016.

- » Not surprisingly, large organizations are most likely to have larger training budgets, with almost one-third indicating their budget is \$25K-\$100K and a third citing a budget in excess of \$100K
- » 25 percent of those with *Advanced* training programs have training budgets of \$100K or more

Analysis: The number of programs (28%) that continue to operate without a dedicated budget for training is troubling. This major program deficiency is shared equally across organizations of all sizes. And the lack of defined budget is a characteristic found in *Basic* and *Reactive* programs (81%).

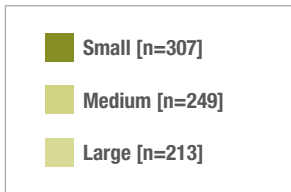
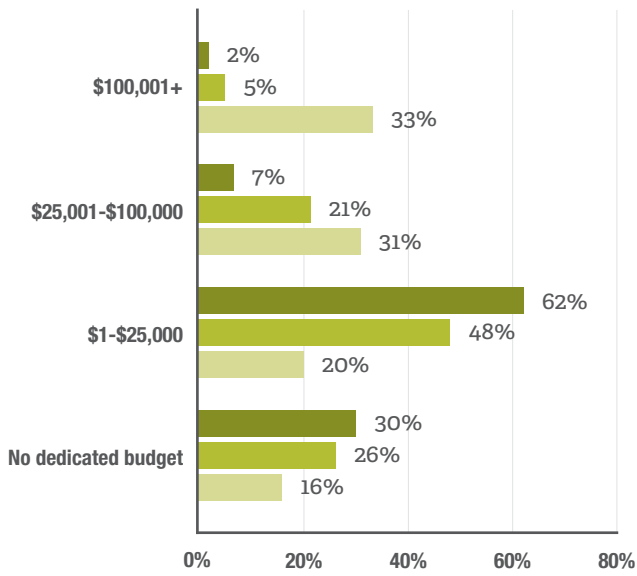
A dedicated budget helps ensure predictability and allows for long-term planning (which is critical to success). However, even among *Advanced* and *Mature* programs, nearly one-third have room for improvement as they don't have a dedicated budget (11% of *Advanced* and 18% of *Mature* organizations).

There is also a correlation between program maturity and size of budget. Organizations with larger budgets tend to be more mature programs. Organizations with smaller budgets are more likely to report that they have *Reactive* (42%) or *Basic* (41%) training programs.

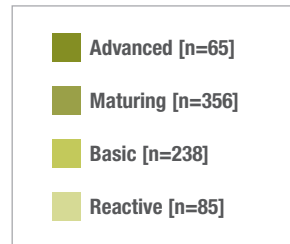
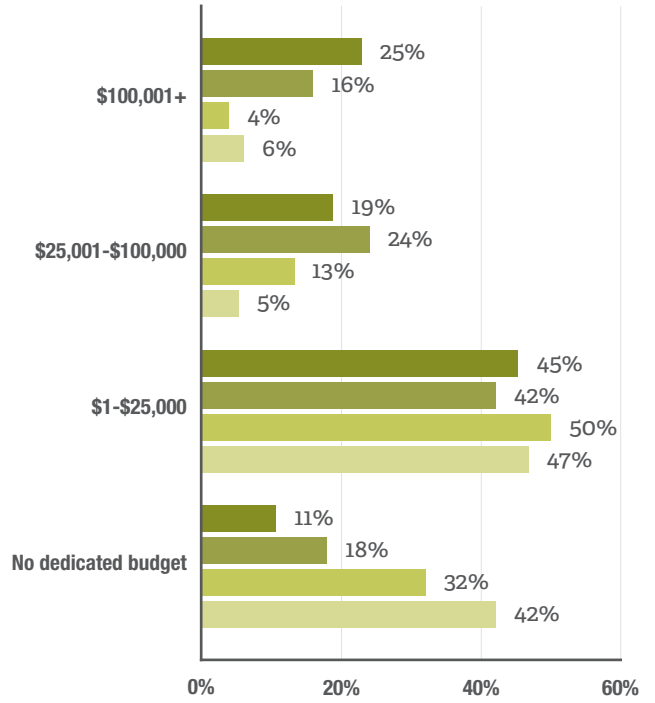
Benchmark Ethics & Compliance Training Continued

What Is Your Organization's Total Dedicated Budget for Ethics & Compliance Training (Not Including FTE Salaries)?

Dedicated Budget by Organization Size



Dedicated Budget by Program Maturity



Benchmark Ethics & Compliance Training Continued

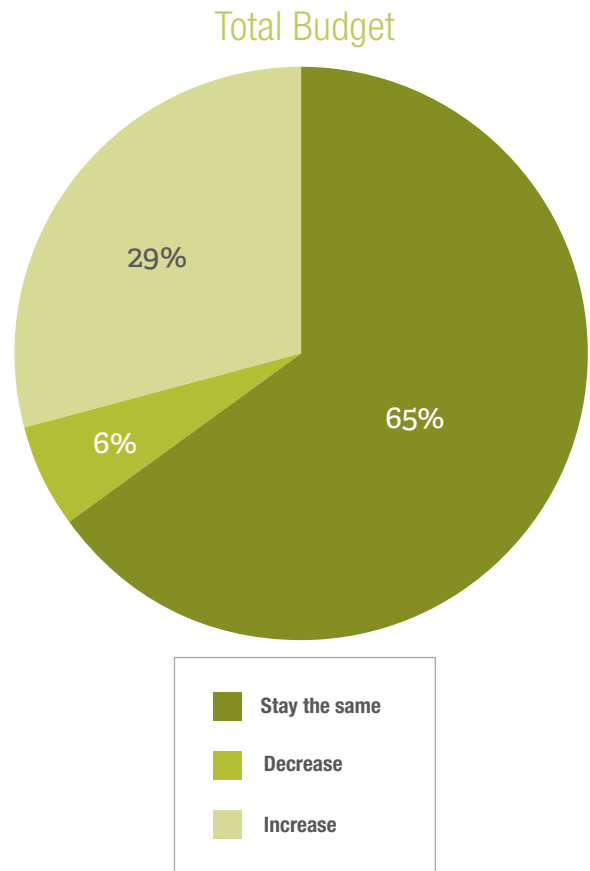
What Is the Anticipated Change in E&C Training Budgets over the Next 12 Months?

Findings: Nearly two-thirds (65%) of organizations with dedicated training budgets anticipate that these budgets will stay the same over the next 12 months, identical to 2016 findings. Just over one-quarter (29%) anticipate an increase and 6 percent anticipate a decrease in budgets, also in line with 2016.

- » Notably, a higher proportion of small businesses anticipate their budgets will increase over the coming year (26% vs. 12% in 2016).
- » Nearly 4 of 5 small organizations anticipate that their budget will stay the same. Just under a third of both medium and large organizations expect budget increases in the next year.
- » A higher proportion of organizations with large training budgets over \$100K expect an increase in their annual budget (42%) than those with smaller training budgets, where just over one-quarter (27%) anticipate an increase.

Analysis: As we have seen in the last few years, organizations continue to report that they are asked to do more with their programs, yet need to do so with little or no changes in budget. With a dynamic regulatory environment, increasing demands for targeted training and flexible delivery methodology, training program administrators are under increasing pressure to manage more complex yet more efficient programs. This may require using shorter, targeted messaging that’s engaging, drives understanding, application and retention, all within budget. It is an unenviable task, but as this report shows, with a structured program, it is more likely to result in success.

In the Next 12 Months, How Do You Predict Your Ethics & Compliance Training Budget Will Change? (Respondents with Dedicated Budgets)



Base: All respondents, n=639.

Budget by Organization Size

	Large	Medium	Small
Stay the same	53%	70%	70%
Increase	37%	27%	26%
Decrease	10%	3%	4%

Base: Large= >5,000 employees [n=219], Medium= 500-5,000 employees[n=208], Small= <500 employees [n=211].

Benchmark Ethics & Compliance Training Continued

How Many FTEs Are Involved in E&C Training Programs?

Findings: The number of FTE employees involved in ethics & compliance training has increased over the past year in large organizations, with 61 percent indicating four or more FTEs compared to 31 percent in 2016. Small organizations, on the other hand, have seen a decrease in the number of FTEs, with 31 percent indicating four or more FTEs, compared to 47 percent in 2016.

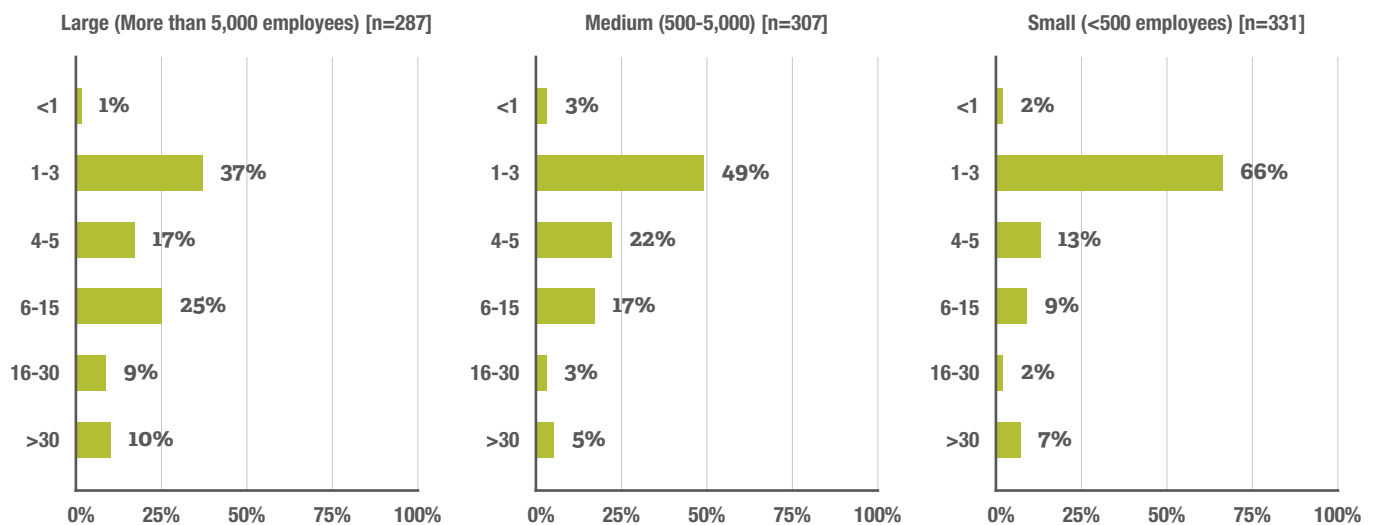
- » Organizations with training budgets over \$100K have more FTEs, with 67 percent having more than 3 FTEs compared to only 39 percent of organizations with less budget, and 41 percent of those with no dedicated budget

Analysis: Organizations of all sizes remain hampered by limited staff available to manage

training program initiatives. Across organizations of all sizes, programs on average have only 1-3 full-time equivalent dedicated employees. When respondent organizations are evaluated based on the regulatory intensity of their industries, there is no significant difference in the number of dedicated FTEs in each organization.

Although technology can help streamline workflows, significant staff time is still required to develop, administer, track, plan and report on program achievements. And as many organizations are actively using both eLearning and live training in their programs, time is required to both develop and deliver such training. Delivering world-class training and ensuring program effectiveness require compliance leaders to rethink their staffing needs and structure of their programs.

How Many Full-time Equivalent (FTE) Employees in Your Organization Are Responsible for the Management, Creation or Delivery of Ethics & Compliance Training?

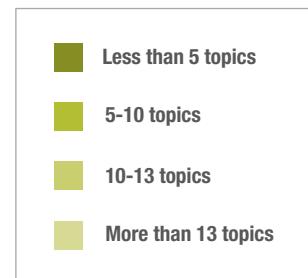
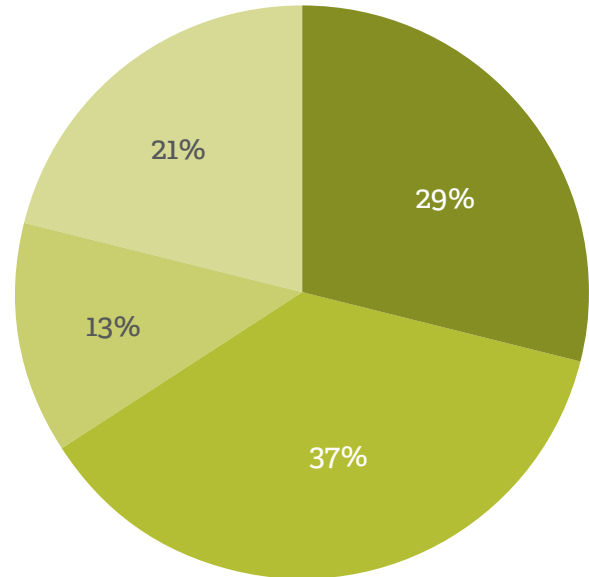


What Are the Anticipated Training Topics?

Findings: Most organizations plan on offering fewer than 10 topics over the next 2-3 years. Most (93%) will provide some type of conduct training, and just over two-thirds will provide training on employment law and information security topics. Just less than two-thirds will provide training on topics related to compliance.

- » The top three topics have remained the same in 2017 as in 2016 – code of conduct/ethics, workplace harassment, and conflicts of interest. However, across all topics, fewer organizations indicate they will be offering training
- » Large and medium organizations are more likely to offer training on compliance related topics (79% and 59%, respectively) than small organizations (45%)
- » Organizations with a formal training plan are more likely to provide training on information security topics (73% vs. 59%) and compliance topics (69% vs. 46%) than ones without a formal training plan. And organizations with a formal training plan are more likely to offer training on more than 13 topics than those without a formal plan (27% vs. 13%)
- » Organizations with high and moderate employee turnover are more inclined to provide training on employment law topics (76% and 73%, respectively) than organizations with low turnover (59%)

Number of Training Topics Over the Next 2-3 Years



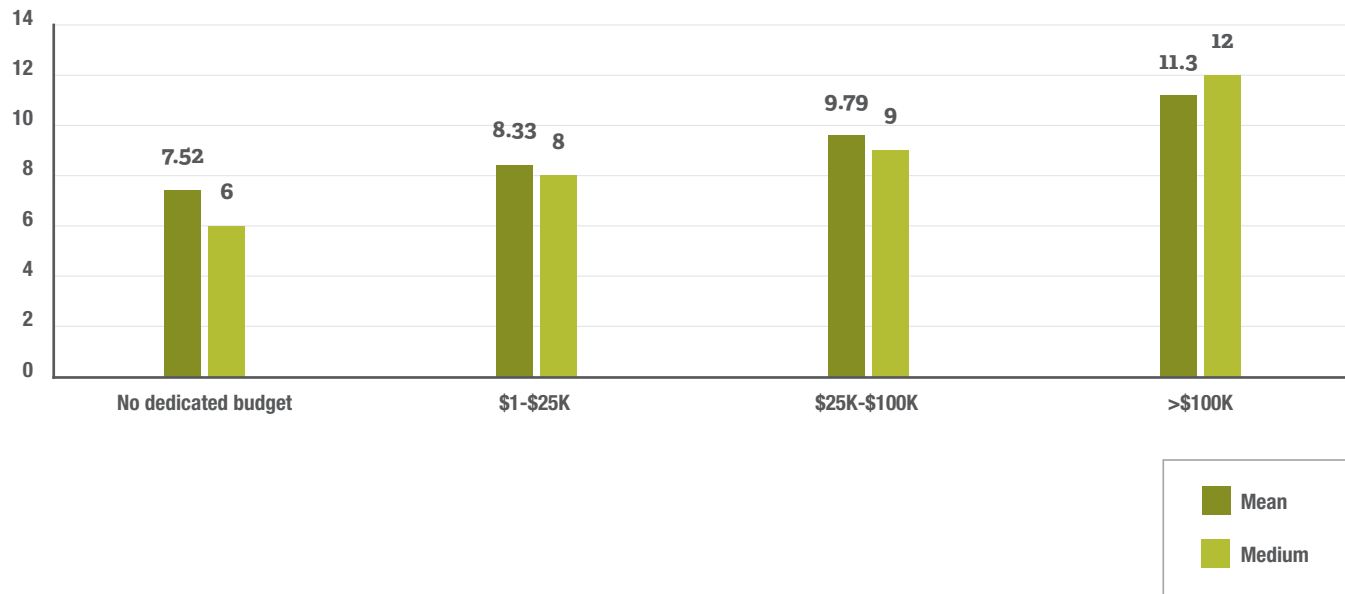
Base: All respondents, n=928.

Benchmark Ethics & Compliance Training Continued

Analysis: There is a relationship between the number of topics on which training is offered, and organizations offering more topics as their maturity level increases. This trend is in line with best practices around education planning; when done right, planning empowers an organization to effectively cover more risk areas. In addition, most organizations training on a topic do so on a repetitive basis, either annually or every other year. This training cadence is in line with regulatory guidance recommending periodic training. Training less frequently leaves an organization vulnerable to increase in misconduct, and an increase in legal risk.

The results also indicate that insufficient attention is being paid to critical topics that apply to all organizations across industries. Topics such as insider trading (18%), social media use (38%), diversity (34%), and wage and hour (20%). All organizations, including those struggling to cover some of these critical topics, should consider adding or expanding on the use of micro learning in their programs.

Average Number of Training Topics Offered by E&C Training Budget Size



Base: All respondents, n=770.

What Training Topics Will Be Covered & How Often?

	Year		How often will these topics be offered?			
	2016	2017	One time only	About every year	About every two years	Every three years or longer
Compliance Training						
Anti-Bribery & Corruption	60%	43%	4%	65%	23%	7%
Antitrust & Competition Law	46%	23%	5%	56%	33%	7%
Government Contracting / Federal Acquisition Regulations Topics	31%	19%	9%	61%	20%	10%
Money Laundering	25%	18%	6%	68%	20%	6%
Insider Trading	30%	18%	4%	60%	23%	12%
Conduct Training						
Code of Conduct / Ethics	93%	78%	8%	70%	17%	5%
Conflicts of Interest (COI)	76%	53%	8%	65%	19%	9%
Speaking Up and Reporting / Anti-Retaliation	68%	43%	7%	72%	15%	6%
Gifts & Gratuities	66%	43%	6%	72%	15%	7%
Social Media	50%	38%	12%	57%	19%	11%
Ethical Leadership / Decision Making	51%	35%	7%	61%	20%	11%
Technology Use / Use of Assets	44%	34%	13%	65%	16%	6%
Third-Party Compliance	43%	25%	8%	66%	21%	6%
Human Trafficking	11%	8%	16%	50%	24%	11%
Employment Law Training						
Workplace Harassment	76%	56%	6%	59%	29%	6%
Discrimination	63%	42%	5%	65%	22%	8%
Abusive Conduct / Bullying	53%	34%	7%	61%	25%	7%
Diversity & Inclusion	50%	34%	7%	60%	22%	11%
Workplace Violence	51%	32%	8%	62%	21%	9%
Wage & Hour Laws (FLSA)	29%	20%	15%	54%	23%	8%
Disability Accommodation (ADA)	31%	19%	14%	55%	21%	11%
Information Security Training						
Data Privacy	63%	45%	7%	73%	17%	4%
Cyber Security / Information Security / Confidential Information	69%	41%	5%	75%	16%	4%
HIPAA	41%	30%	8%	77%	10%	4%



Benchmark Ethics & Compliance Training Continued

How Many Hours of Training Courses Were Deployed?

Findings: On average, middle managers and non-managers receive the highest number of training hours, followed by senior leaders and board of directors. Few organizations train third parties, and if they do, generally provide about one hour or less of training.

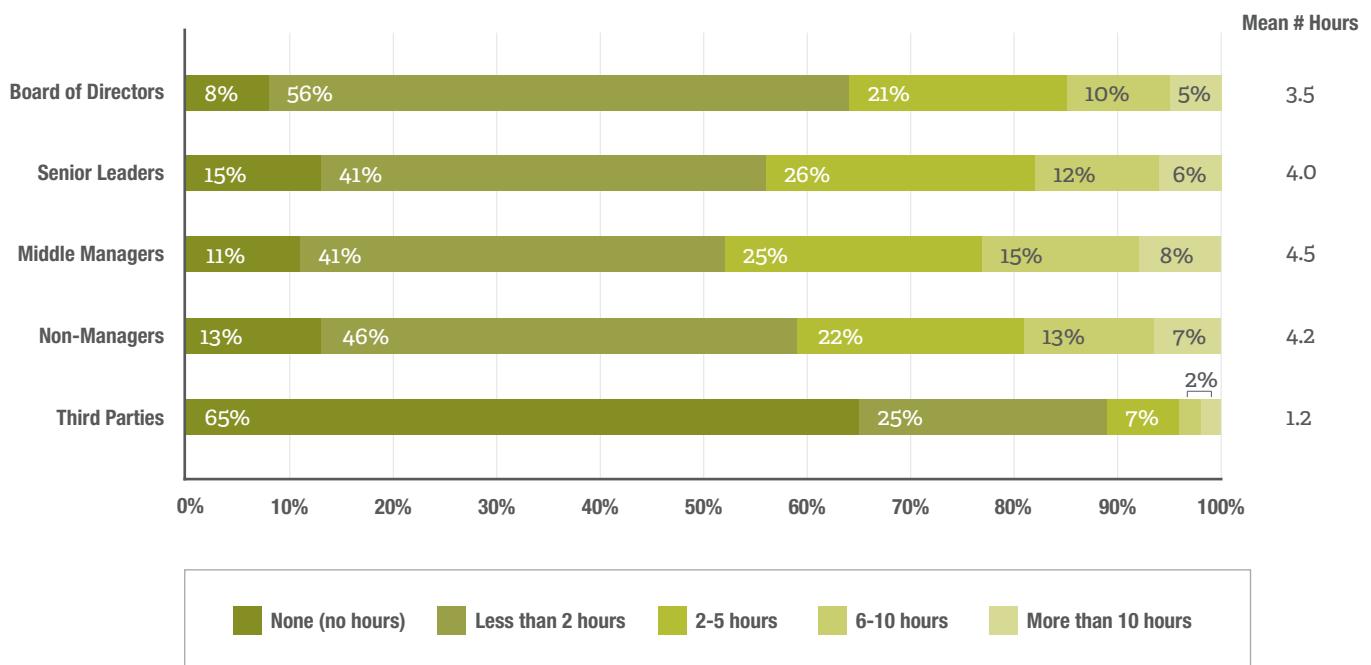
- » Organizations with formal training plans provide on average more hours of training to their board (3.8 hours vs. 2.4), senior leaders (5.1 hours vs. 2.9), and middle managers (6.0 hours vs. 3.7) than those without a formal training plan

Analysis: Regardless of role or level in the organization, the number of hours dedicated to training continues to be a challenge for

organizations of all sizes and industries. Mean numbers this year reflect a trend downward in available seat time for all groups except directors, who will receive more training in the coming training cycle.

Reduced seat time could be the result of more efficient programs (targeted, risk-based programs that are well-planned) or could be a byproduct of programs not receiving sufficient support or funding. If your available seat time is shifting downward (despite pressures to cover more risk areas) it is important to evaluate why you are experiencing the shift, is it a controlled or uncontrolled change, and whether program modifications (better communication to and support from upper management, for example) are required to get your program back on track. Training all employees on relevant compliance priorities is vital to an effective compliance program.

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



Note: For board members, only among those organizations that provide training to the board. Board of Directors n=406, all others n=928.

Benchmark Ethics & Compliance Training Continued

What Types of Board Training Are Provided?

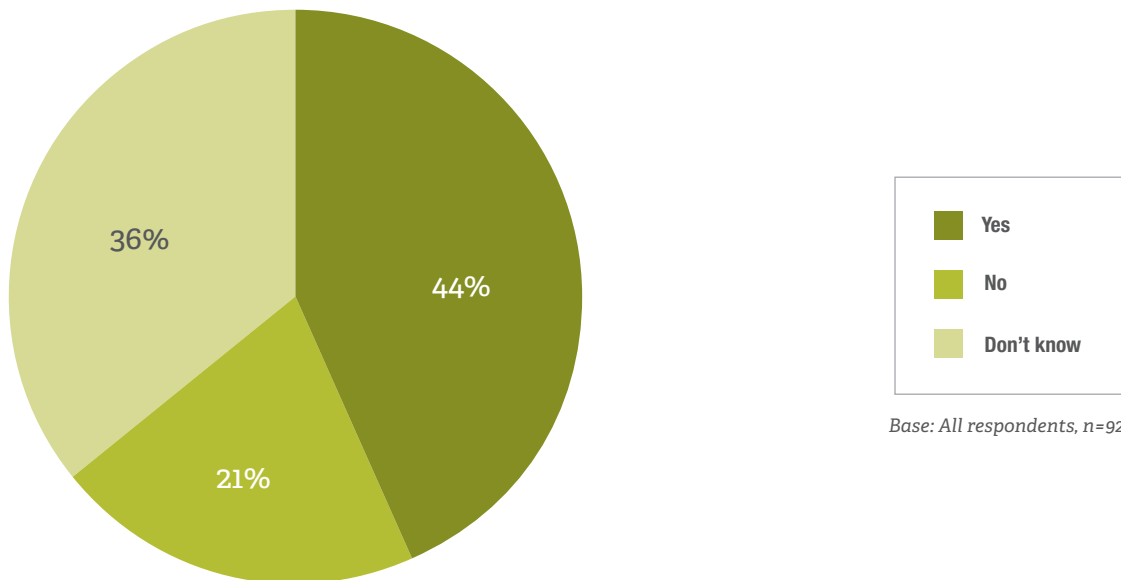
Findings: Organizations that provide training to their board in 2017 (44%) are split in terms of whether they offer a single training format or multiple formats. In-person or live training is the most common approach to E&C training delivered to boards (74% overall), followed by access to eLearning that is provided to employees (47%), and content developed exclusively for the board (14%, down from 40% in 2016).

Of those organizations that do provide board training:

- » Those with training budgets more than \$100K are more inclined than those with smaller or no fixed budgets to develop training content exclusively for their boards (23% vs. 12%)

Analysis: Only 44 percent of respondents provide training to their board. This number is incredibly low in light of the oversight responsibilities assigned to the board, and represents a significant decline from 2016 (58%). In the current compliance environment, where risks evolve quickly, it is more important than ever to have alignment at the highest levels of the organization. The connection between compliance missteps and organizational value is unmistakable; in the past year we have seen numerous companies hit hard financially as a result of a compliance scandal. In order to ensure proper oversight and obtain appropriate funding and support for the training program, the board must be educated about this link and the tools required to mitigate risk.

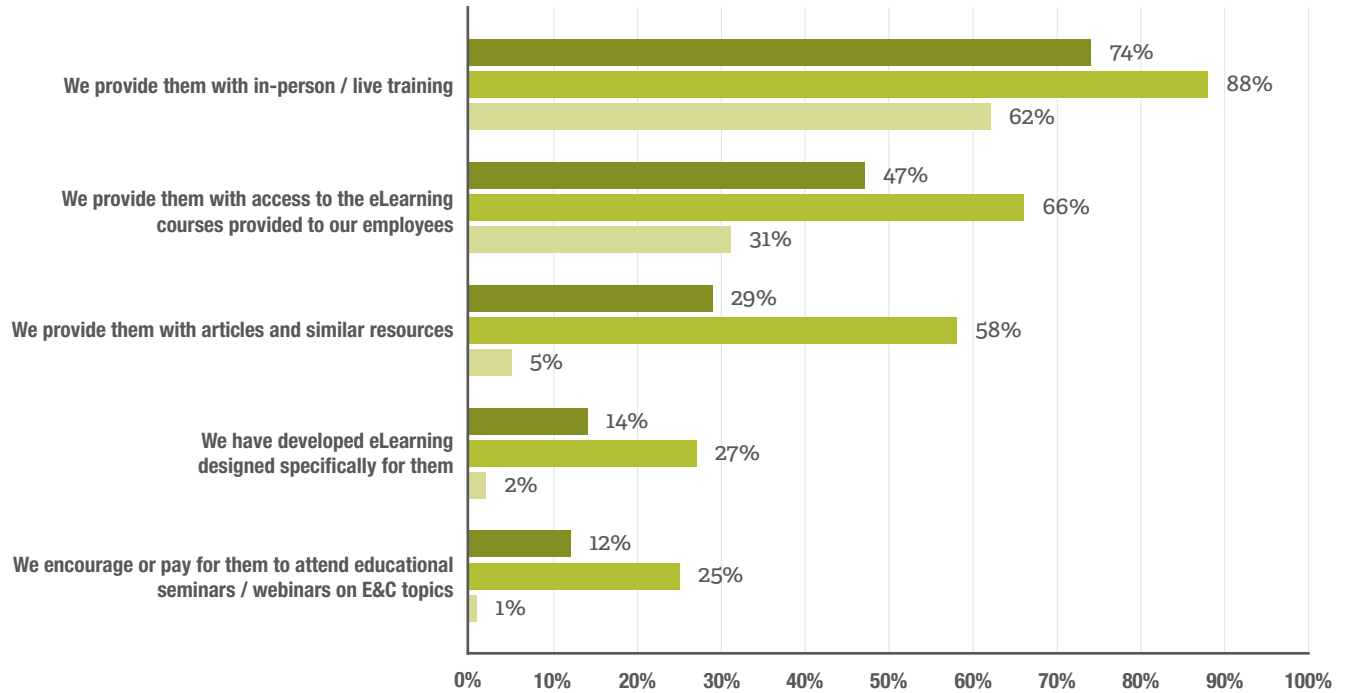
Will Your Board of Directors Receive Ethics & Compliance Training in 2017?



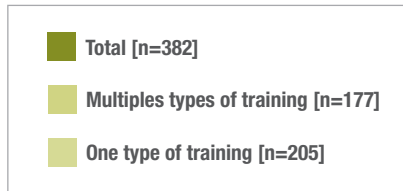
Base: All respondents, n=929.

Benchmark Ethics & Compliance Training Continued

How Do You Provide E&C Training to Your Board?



Base: Excludes 'don't know' responses. Multiple responses possible.



Benchmark Ethics & Compliance Training Continued

How Often Is E&C Training Delivered to the Board?

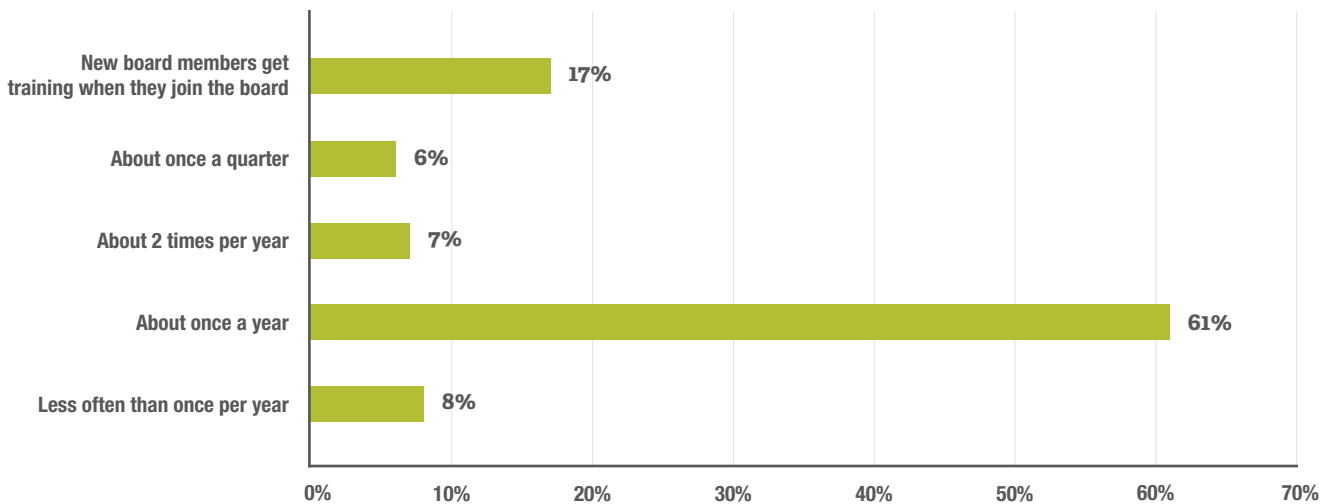
Findings: Of those organizations that do train their boards, they typically provide training on an annual basis. Almost 1 in 5 indicated that new board members receive training when joining the board.

Analysis: Like employees who receive training on the code and important risk areas when hired, members of the board should likewise be immersed in this same learning. New hire training exposes the individual to the culture, the risks, and expectations established by the organization

– and it is an important way to level-set and gain alignment around important values. Even though this point represents an ideal opportunity for training, only 17 percent of new directors are receiving E&C training.

For those organization that do provide education to directors (44%), 61 percent are providing it at least annually and 15 percent are offering it 2-4 times per year. For this subset of organizations, we are seeing a positive trend with a slight increase over 2016. Regular education on risks and program effectiveness is essential to ensure proper funding and oversight of the program and to ensure that directors understand how to help the compliance program evolve.

How Often Do You Deliver Ethics & Compliance Training to Your Board?



Base: Excludes 'don't know' responses, n=366. Multiple responses possible.

Benchmark Ethics & Compliance Training Continued

What Are the Board Training Topics?

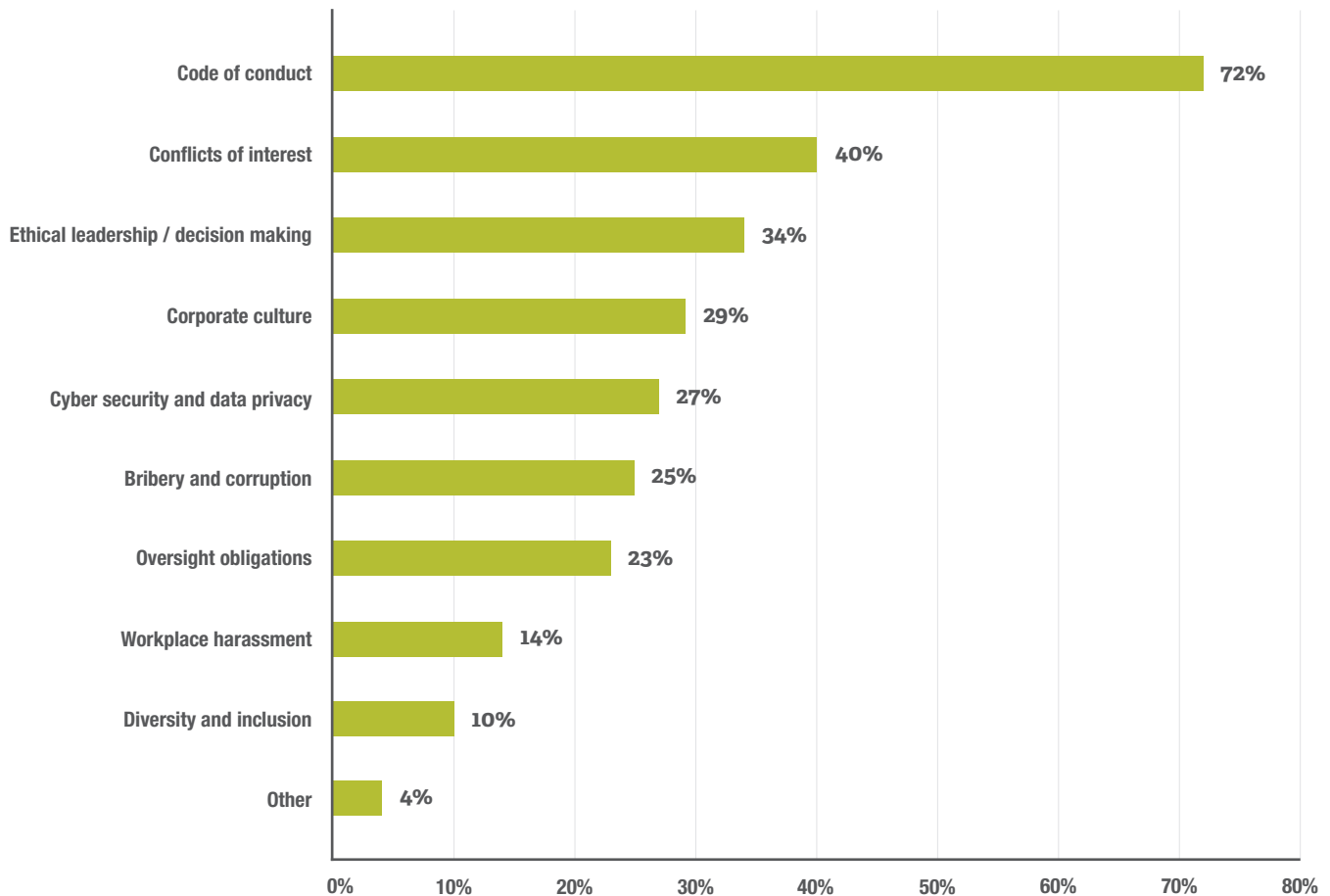
Findings: Among organizations that provide E&C training to their board, almost three-quarters focus on the code of conduct.

- » Organizations with a formal training plan are more likely to focus training on corporate culture, than those without a formal plan (32% vs. 19%)

- » Large organizations are more likely to focus on bribery and corruption, compared to small and medium organizations (38% vs. 19%)

Analysis: A positive trend is that board training has focused on topics that impact the culture or minimize the legal risk associated with board members' actions (72% are trained on code of conduct and 40% on conflicts of interest). Given the recent news and trends, we are surprised that workplace harassment was not a top three priority for many organizations.

What Are the Top Ethics & Compliance Topics On Which You Focus Training Provided to Your Board? Select Up to Three (3)



Base: Excludes 'don't know' responses, n=379.

Benchmark Ethics & Compliance Training Continued

What Are the Elements of E&C Training Programs?

Findings: The most common components of E&C training programs are mandatory assigned E&C training: training for new staff, senior leadership support for training, and eLearning. Mobile, micro learning, and social are less widely implemented, however there has been a slight increase in organizations employing these approaches since 2016.

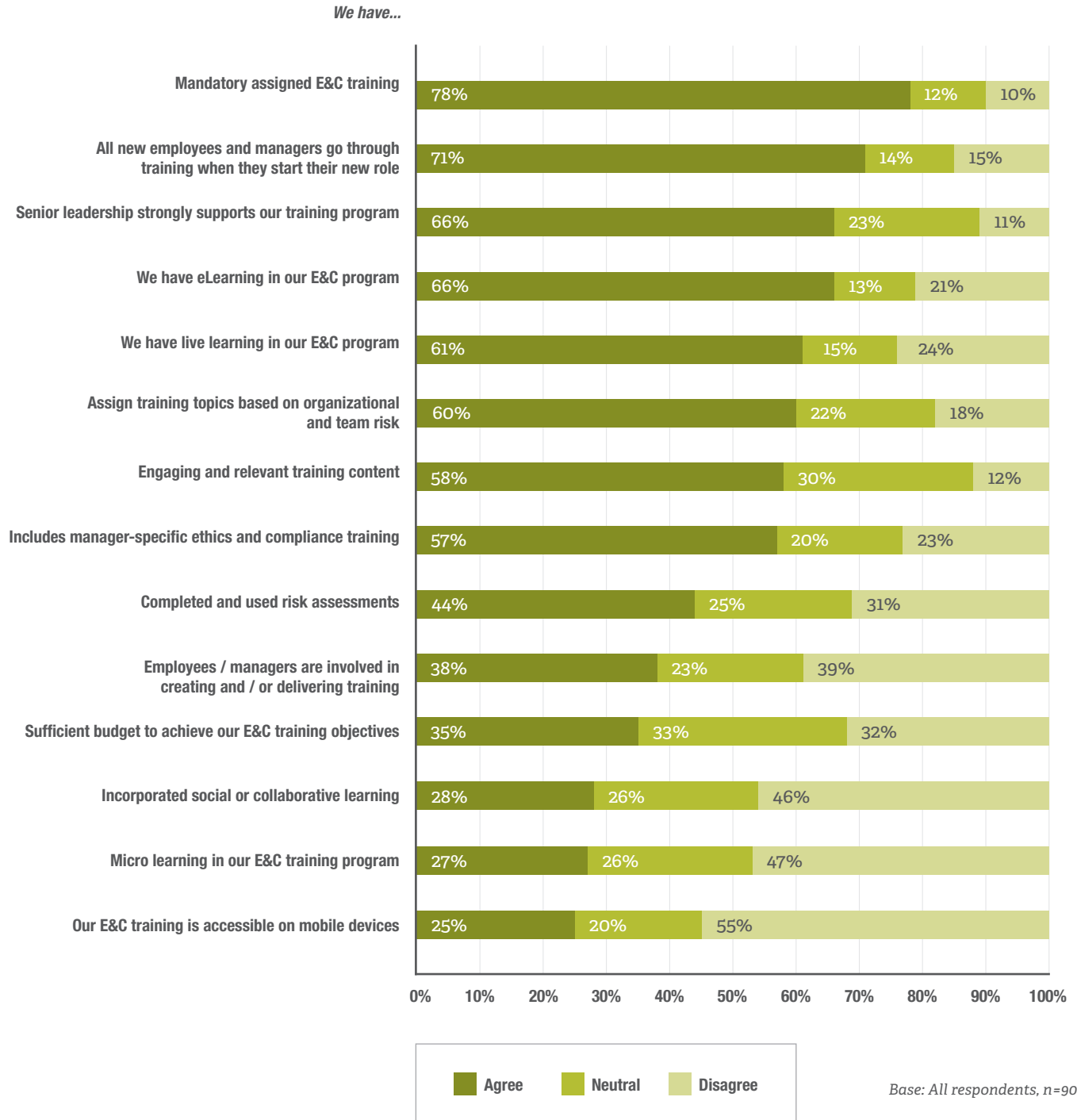
- » Organizations with a formal training plan in place are more likely to indicate that training is mandatory (91% vs. 58% of organizations with no formal plan). They are also significantly more likely to indicate that their E&C training program has all listed elements compared to organizations with no formal plan
- » Organizations with low employee turnover are more inclined to indicate that they have sufficient budget to achieve their objectives than organizations with high turnover (43% vs. 27%)
- » Large organizations, those with dedicated training budgets and more *Mature* or *Advanced* organizations are more likely to indicate that their program contains these elements

Analysis: Most companies are covering the basic elements of training. While adoption rates of the most important emerging trends continue to rise, there is still room for dramatic improvement. Most learners now have access to and heavily use mobile devices; however, only 25 percent indicate training is available on them (up from 19% in 2016). Despite challenges on topic coverage and seat time, only 27 percent are leveraging micro learning in their programs; while this represents growth over 2016 numbers (20%), this method is still underutilized. Well-embedded cultural trends, such as social and collaborative interactions, are still under-represented in compliance programs (28%), but it is important to note that we are seeing growth in adoption rates over 2016 (18%). Other core program elements experienced a slight decrease, including mandatory assignment of training (down 4%) and new employee training (down 4%).

Although there are pressing challenges facing organizations in terms of basic program structure – the efficient use of training hours, budget ownership, measurement and reporting – it is important to focus on how modernizing your compliance training program can deliver significant benefits. Focus on the way that information is communicated, the context around what is being said, the tools that are required to effectively deliver your message and the quality of the assets that are deployed to have the greatest impact and make a lasting impression. Innovating now will provide immediate benefits for all your learners.

Benchmark Ethics & Compliance Training Continued

Rate Your Agreement with the Following Statements about Elements of Your E&C Training Program



Benchmark Ethics & Compliance Training Continued

How Is Training Effectiveness Measured?

Findings: In line with 2016 findings, most organizations (85%) report undertaking some formal E&C training effectiveness measurement. Organizations typically use a mix of approaches (3.7 on average), with post-training quizzes and training completion rates being the most common.

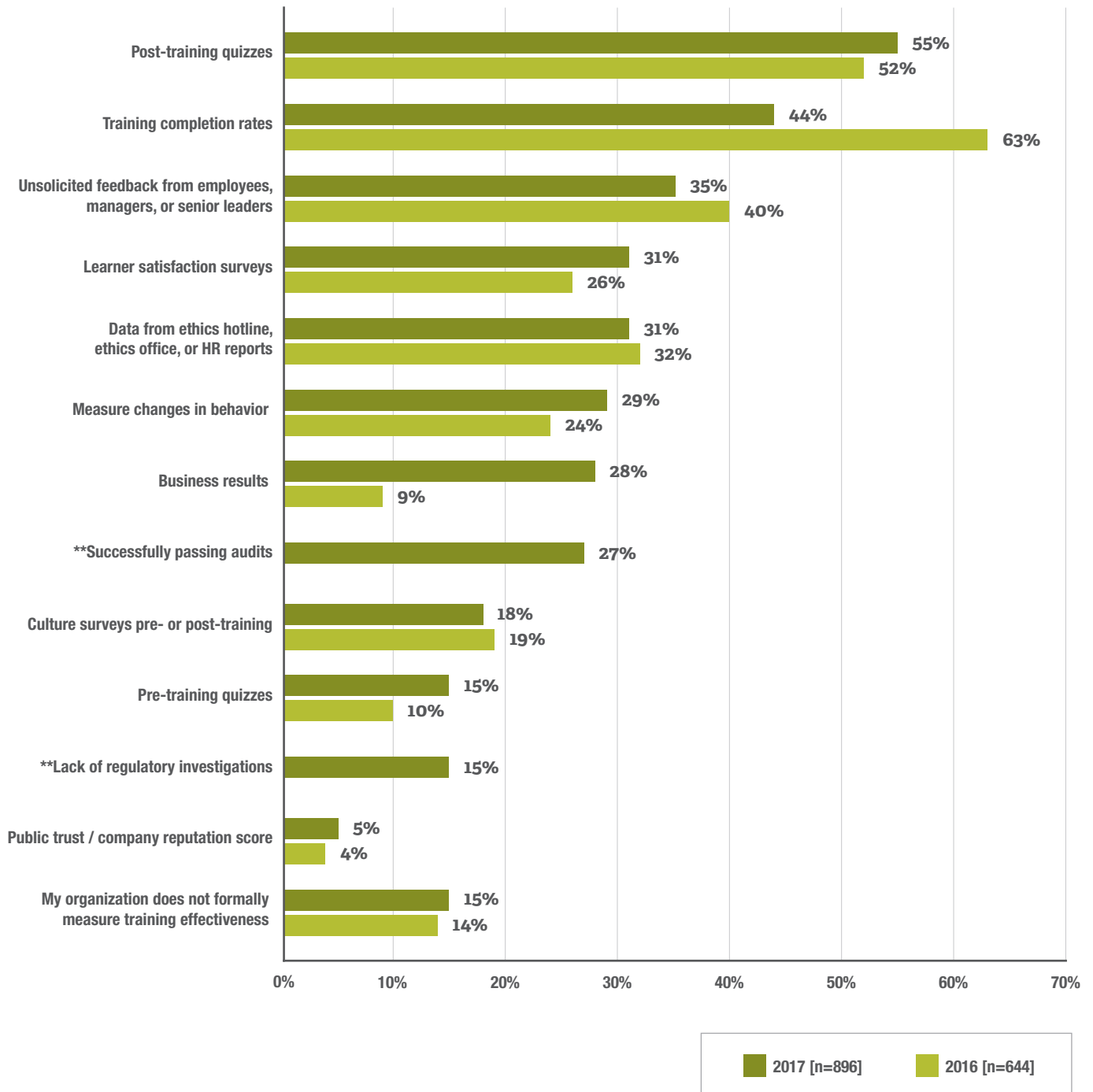
- » Almost a third (30%) of organizations with no fixed budget indicate their organization does not formally measure training effectiveness
- » Large organizations, more *Mature* or *Advanced* organizations, and those with dedicated training budgets tend to use a greater number of approaches to measure training effectiveness

Analysis: Fifteen percent of organizations do not measure effectiveness at all. Of the organizations that do measure, we are seeing some great trends. Reliance on completion rates is down to 44 percent, from 63 percent in 2016. On the rise are other more accurate methods including post-training quizzes (up 3%), learning satisfaction surveys (up 5%), changes in behavior (up 5%), pre-training quizzes (up 5%), and business results (up 19%). One metric that remains elusive and a challenge is cross-platform data, which remained relatively flat at 31 percent.

Number of Approaches Used to Measure Training Effectiveness (Mean)

Number of employees			Maturity level				Presence of a dedicated budget	
Less than 500	500-5000	More than 5000	Reactive	Basic	Maturing	Advanced	There is a budget	No dedicated budget
3.0	3.2	3.8	2.0	2.5	3.8	4.9	3.6	2.7

How Do You Measure the Effectiveness of Your E&C Training?



**Note: Response categories not offered in 2016. Multiple responses possible.



Benchmark Ethics & Compliance Training Continued

What Are the Compliance Training Program Outcomes?

Findings: A sizeable number of respondents (about a third to half) indicate they are unsure what outcomes their E&C training program has achieved. They are especially uncertain the extent to which their program has reduced employee turnover. However, analysis suggest that organizations with sufficient budget (mainly organizations at an advanced stage of maturity) for their E&C training program experience lower employee turnover than those with insufficient budgets. Employee turnover is considered one of several indications of the strength and quality of an organization's culture.

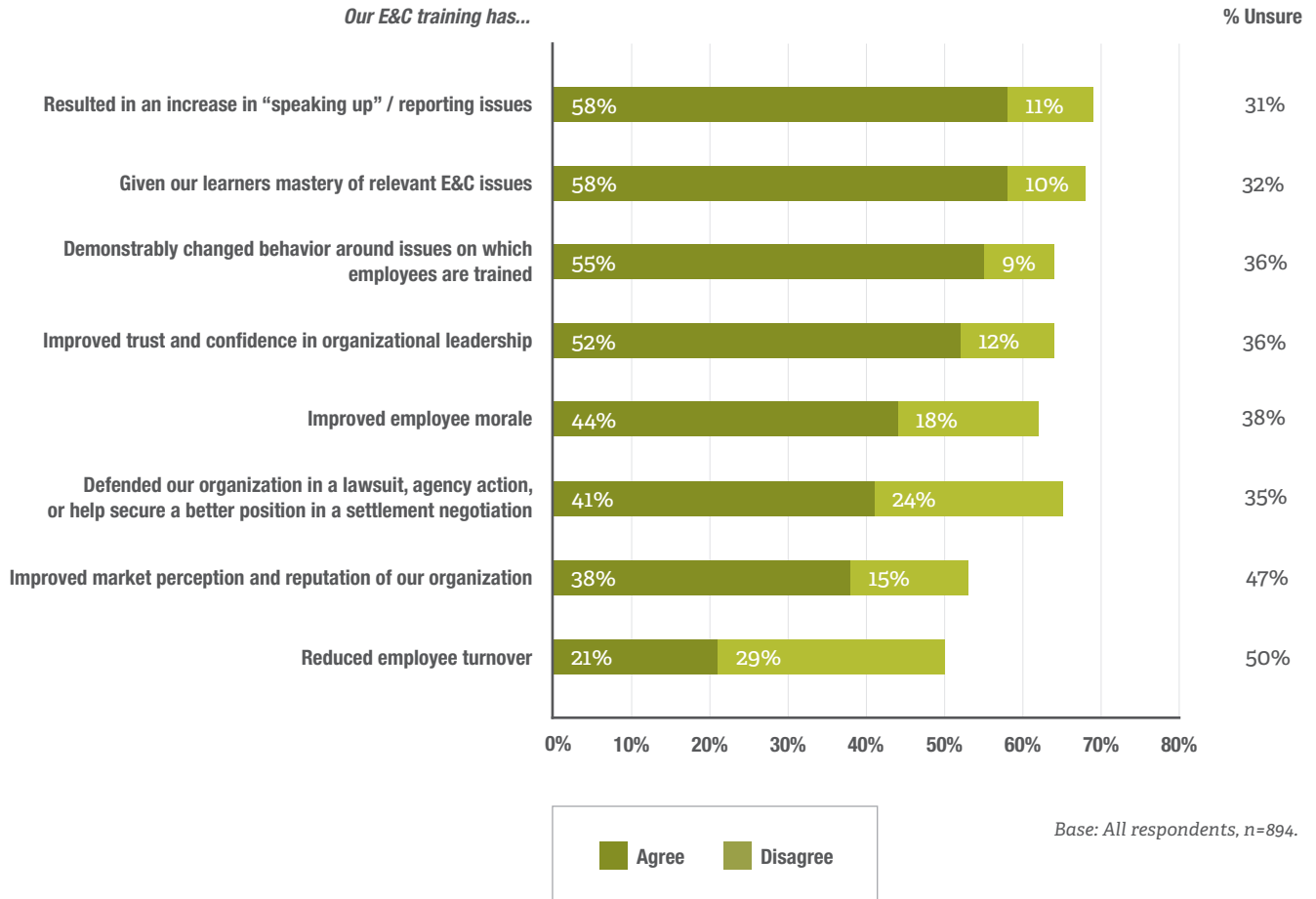
More than half of organizations reported an increase in employees reporting issues, that employees have mastered E&C topics, behavioral changes, and improved confidence and trust in the leadership.

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

Analysis: Organizations with more mature E&C training programs realize greater benefits. Although few organizations attempt to demonstrate a return on investment from their E&C training program, organizations maturing their practices realize greater benefits from their E&C training programs than organizations with less mature programs. For example, more than half of organizations with *Advanced* or *Mature* programs indicate their employees have gained mastery over relevant E&C issues, have increased incident reporting, have facilitated behavioral changes, and have improved trust in the leadership, compared to fewer than half of organizations with *Reactive* or *Basic* maturity levels.

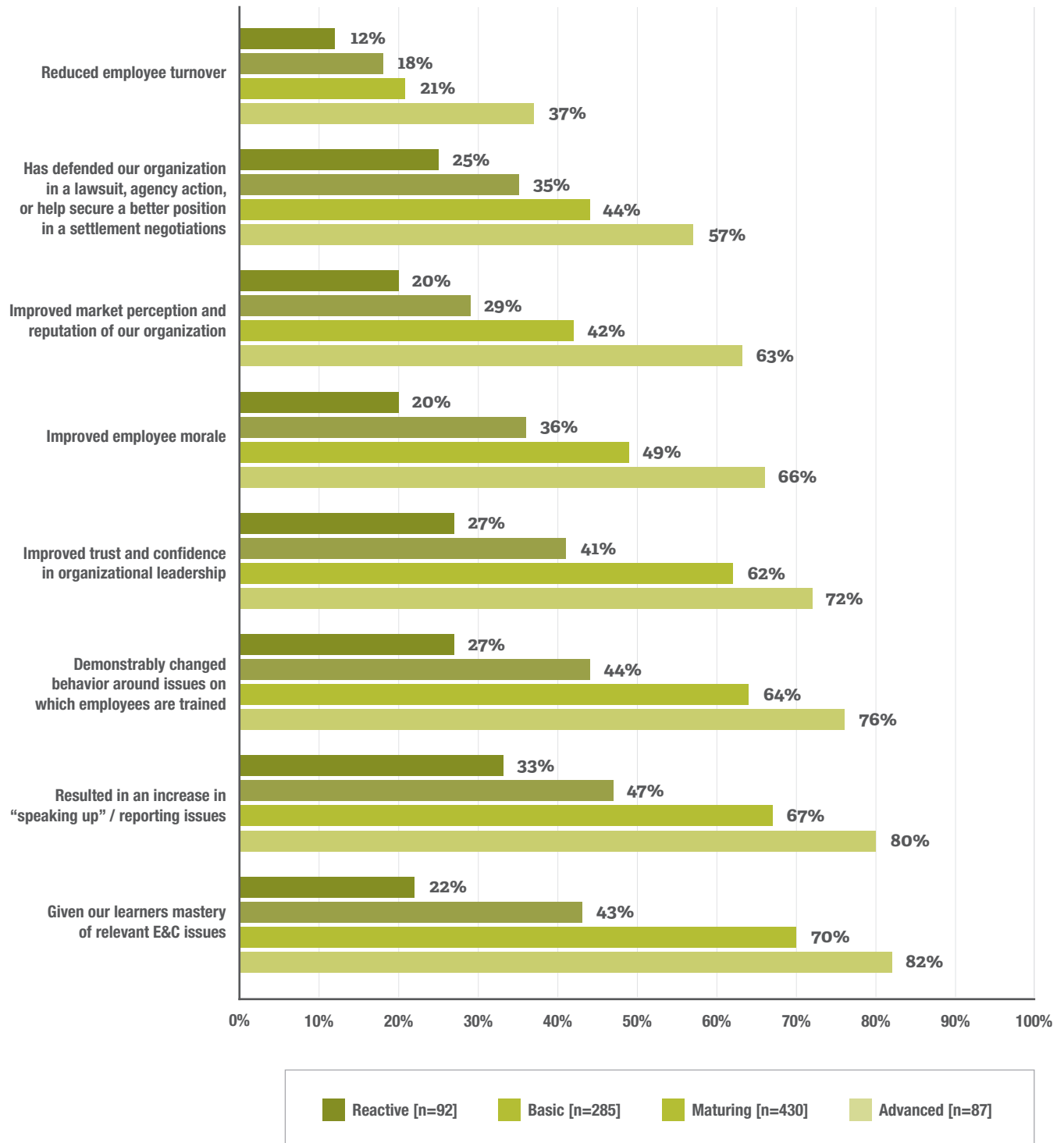
Benchmark Ethics & Compliance Training Continued

Rate Your Agreement with the Following Statements about the Outcomes of Your E&C Training Program



Benchmark Ethics & Compliance Training Continued

Please Rate Your Agreement with the Following Statements about the Outcomes of Your E&C Training Program (% Who Agree)

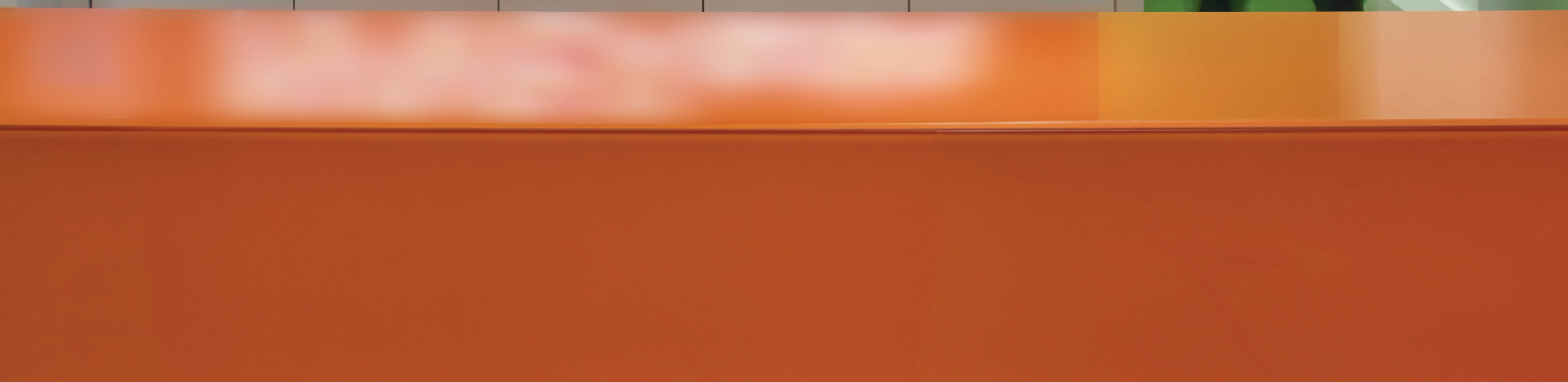






NAVEX GLOBAL®

The Ethics and Compliance Experts



CONCLUSION & KEY TAKEAWAYS

Ethics and Compliance training is an important element of an effective compliance program. It is through training and education initiatives that organizations most effectively share out their ethics and compliance expectations, the code of conduct and employee behavior expectations, and the organization's drive toward delivering a culture of ethics and respect.

Done properly and executed with excellence, a training program can also help reduce risk, enhance employee engagement and morale, and drive desired compliance behaviors. But executing a program at this level takes structure, commitment, and analysis. As we see in this report, more *Advanced* and *Mature* training programs are seeing many of these rewards at much higher rates than programs than are considered *Basic* and *Reactive*.

In order to successfully overcome the challenges that lay ahead, organizations must strive to advance their training programs and use the methodologies discussed herein to get more value out of them. Structured programs with dedicated budget, multiyear education plans, true effectiveness measures, work-flow improvements and a mix of high-quality training options will reap the greatest rewards from their programs.

Key Takeaways

- » **Earning respect can be constant.** We see that employee cynicism is the top concern in terms of undermining program efficacy, followed closely by multiple measures that demonstrate employee suspicion of E&C program security and honesty (page 17). In some organizations, those who manage training programs are facing a Sisyphean task where they not only need to address
- organizational risks within limited hours and budgets, but also must battle insurmountable learner fatigue and resistance. Demonstrating small wins through program efficiencies that include shorter content, targeted topics, and detailed reporting and measurement can offer a pathway to defeat cynicism and fatigue. Ensuring that the content you deliver is high-quality, engaging and meaningful will also help to dramatically cut employee skepticism.
- » **Focus on increasing executive buy-in.** The top two challenges facing organizations – lack of time and resources – can be lessened by increasing executive buy-in. Demonstrate the need for the program by adopting more rigorous measures to assess the effectiveness and return on investment, and share your program successes and challenges with executive leaders. Utilize this report to help establish a need for a more mature and better funded program.
- » **Build a risk-based training program.** Define your organization's risk profile based on its people, processes and regulatory landscape, and prioritize training topics, hours and audiences based on how to address your most pressing risks first. Utilize risk-based training topic assignments to improve effectiveness and efficiency as well. By targeting training topics to audiences based on risk-defined needs, an organization can reduce the overall training burden on its learner base and drive effectiveness. Risk-based training programs allow organizations to prioritize education, deliver the right training to the right learner, and better allocate scarce resources over their training cycle. A disciplined approach and focus helps organizations drive positive program outcomes.

Conclusion & Key Takeaways Continued

- » **Keep program objectives front and center.** Once you define your key objectives and program goals, you must recognize that the business world is dynamic; changes in training requirements will not only happen, they should be expected. Build your structure with some flexibility, but also build it with a focused intention to reach a defined ethics and compliance objective. When making decisions about what courses to train on and which assets to build and/or purchase, ask yourself if they will advance your ultimate program goals and objectives. To get the measurable outcome you desire, ensure that your training is high-quality, effective and sets the right tone. Check-the-box training (no matter how cost effective) will undermine efforts to change culture and will likely create more employee cynicism.
- » **Optimize your program to perform.** The challenges of limited seat time and program resources have been persistent challenges for programs of all sizes and complexities since our first benchmark report four years ago. But as these foundational challenges persist, other challenges place enormous additional pressure on programs, including the expectation that the program will be able to address an increasing set of risk areas while also improving on the quality of what is delivered and demonstrating an ROI on the efforts. To even begin to meet these challenges, leaders must seek out and deploy training content that is up to date, covers topics adequately, and efficiently and effectively educates learners. It requires prioritization of topics, optimization of seat time, and creativity around education,

awareness and attestation. A strategic program, planned and diverse, can enable organizations to meet their training requirements and create a culture of respect within the resource and time challenges they face.

- » **Recognize your training program's ROI.** Defining how you will measure the return on your training investment is important, no matter how well defined your program is. This report shows that more mature programs see better program outcomes across multiple key measures. While these alone may demonstrate the ROI of a training program to many, program leadership should be looking for methods to prove ROI throughout the life of the program. We found in our results that less than 10 percent of respondents actively calculate the ROI for their training programs, but the methodology for assertions are not consistent. Most correlate training ROI with a reduction in hotline reporting incidents and law suits, while fewer assessed ROI based on employee satisfaction, followed by employee output. But the overwhelming outcome is the majority of those investing in training programs have difficulty quantifying the return on the investment. This is not surprising to us, yet we are watching trends to both report on and help the market better measure the ROI of training programs.

ABOUT NAVEX GLOBAL'S NAVEXENGAGE ETHICS & COMPLIANCE TRAINING

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

- » Online training courses that feature multiple formats, lengths, means of access, and audience targets. Our courseware content is relevant, global, legally vetted, and engaging.
- » In-person training designed for your organization and delivered by our team of advisory and training teams, who have decades of compliance industry experience and many years of consulting on training topics that matter to you, your leadership and boards of directors.
- » Learning management technology and flexible course-deliver options to meet the training, reporting, certification and management needs of organizations of all sizes and complexity.
- » Risk assessment, culture assessments and multiyear training program development that helps organizations to ensure their training program is tightly aligned to their organizational risks and objectives.

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



ADDITIONAL RESOURCES

NAVEX Global also offers many valuable resources relating to improving your ethics and compliance training strategies. Visit our resource center at www.navexglobal.com/resources to find these tools and more:

- » **Online Courseware Library:** Browse our full library of training options and topics:
www.navexglobal.com/coursewarelibrary
- » **Definitive Guide to Ethics & Compliance Training**
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