

Employee Training Guidelines with Post Training Survey

Introduction: Why Train?

Corruption is a widespread phenomenon. It can happen in any geography or market and with any type or at any stage of a business project life cycle. While some corrupt acts are committed knowingly and deliberately, others are committed simply because an individual failed to understand and recognize the risk. An organization cannot implement anti-corruption policies and procedures effectively unless its employees and others with whom it works are trained on the rules and know how to follow them. Training is how this happens. Training arms employees with information they need to do their jobs effectively while avoiding even inadvertent violations of policy or law.

Who should you train?

You should train employees at all levels of the organization, wherever they are located, and in the relevant language. This includes training senior management, including the C-Suite, and the board of directors (or equivalent), who are responsible for cultivating a culture of compliance and 'tone at the top,' on their own roles and responsibilities vis a vis the compliance program. We discuss tailoring your training program to particular roles and responsibilities in more detail below. You may also wish to consider training third parties who may pose a significant legal risk for companies.

How should you train?

At a minimum, you should provide regular (at least annual) anti-corruption training to your employees, but more frequent training will make the most of their ability to concentrate and absorb training material. Short bursts of training can reinforce broad, annual sessions. Similarly, training on specific topics at different times of the year (i.e. gifts and hospitality around the holidays) can be more effective than the typical once-a-year training.

To be effective, training also must be accessible and engaging. While in-person training is a best practice, particularly in high-risk regions or industries, eLearning can be a cost-effective means to provide training. Utilizing technology saves on travel costs and allows for trackable and reportable evidence of employee training completion.

What should you cover?

The goal of your training program should be to communicate a zero-tolerance message and to make your employees and others aware of three key concepts: (1) what conduct is prohibited and why (2) how they may encounter corruption; and (3) how to respond if they do.

For all employee training, that means your training material should cover the following kinds of topics:

- Your anti-bribery policies and what conduct is prohibited
- Key risk indicators
- Who are government officials and state-owned enterprises and how our policies apply to them
- Gifts, hospitality and other expenses
- Charitable contributions
- Political contributions
- Typical scenarios in which bribery can occur
- How to recognize and respond to solicitations
- Duty to comply and consequences of non-compliance
- How to report suspected violations
- Anti-retaliation policy

In addition to the above, and since roles will vary across an organization and across geographies, it is important to customize anti-corruption training specifically to business functions and roles that is tailored to identified risks. For example, this could include training the financial department to spot 'red flags' of corruption or bribery or training the internal audit function on how to audit for corruption. It can mean giving extra training to employees in higher risk functions such as sales or government contracting to recognize solicitations and how to respond. Scenario based training – again tailored to the specific risks that your employees and third-parties may face – is a best practice.

How to know whether your training is effective

For each training, you should require employees to acknowledge that they have taken it, either in-person or electronically, and then maintain those records. It is also important to have a way to measure the effectiveness of the training, such as a quiz at the conclusion of the training or one several months after the training to gauge whether the concepts are retained. Please see the Appendix for an example of a training effectiveness quiz.

How to keep your training up to date

Just as an organization's corruption risks may change over time, so should your anti-corruption training program. At least annually, an organization should review its training program and update it to address changes in law, policy or risk profile. If you move into a new market, you may need to translate to a new language as well.

Key questions:

- Is your training robust and targeted to various groups within your organization?
- Is your training in all relevant languages?
- Does your training address awareness, commitment and implementation?
- Do you evaluate the impact of your training?

Training Effectiveness Survey

Instructions

You should develop evaluation surveys for all types of training, whether online, classroom, or blended. Finding out what trainees thought of the course and how much they learned is vital to increasing effectiveness.

Leading Practices for Developing Effective Evaluations

- Surveys should be given as soon as possible, ideally at the end of training.
- Keep it short – surveys should take no more than five minutes to complete.
- Provide anonymity so trainees can be honest.
- Tie questions to learning objectives.
- For questions that are followed by a set list of responses, provide three to five options.
- Provide at least one open-ended question so trainees can provide specific, detailed feedback. In these types of questions, respondents can write in their own answers.

Sample Effectiveness Survey for Introductory Anti-Corruption Training

Your feedback is critical to improving the quality of our training. Your identity will be kept completely confidential, so please be candid.

Please indicate on a scale of 1 to 5 the extent to which you agree or disagree with the following statements, where 1 is “Strongly Disagree” and 5 is “Strongly Agree.”

Item	Strongly Disagree ←————→ Strongly Agree				
1. The topics covered were relevant to me in my job.	1	2	3	4	5
2. The training materials and their presentation were clear and understandable.	1	2	3	4	5
3. This was the right amount of information to learn in the time provided.	1	2	3	4	5
4. I now understand our company’s anti-corruption policies.	1	2	3	4	5
5. I now understand my role in corruption prevention.	1	2	3	4	5
6. I know who to go to if I have a question or concern.	1	2	3	4	5
7. I would be willing to report a concern.	1	2	3	4	5
8. The material was engaging and interesting.	1	2	3	4	5
9. My time in training was well-spent.	1	2	3	4	5

Please answer this question on a scale of 1 to 5 where 1 is “Poor” and 5 is “Excellent.”

Item	Poor	←—————→	Excellent
10. How would you rate this training overall?	1	2 3 4	5

For the following questions, please use your own words to provide a candid response.

11. What part of the training did you find most effective?
12. What would you recommend changing about the training?
13. Do you have any suggestions for future anti-corruption training?
14. Do you have any other comments, observations, or suggestions?

For in person training, consider adding the following questions:

1. The trainer was knowledgeable about the subject matter.
2. I was encouraged to ask questions.
3. My questions were answered to my satisfaction.