Integrity Training & Communications in the 21st Century: Breaking Old Habits, Deploying Savvy Solutions
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Since the advent of the U.S. Sentencing Commission and its now famous 1991 “guidelines”—one of which is ethics and compliance (E&C) training and communications—the ECOA has been at the forefront of showcasing a wide variety of training tools that its members and specialized firms have developed over the years.

In this article, I provide a snapshot of the evolution of E&C training over the past twenty years and suggest that it’s time to bust the old “training” paradigm wide open and embrace what really matters: seamlessly integrating your own, diversified, and customized brand of integrity education into your business, allowing ethical decision-making to become a natural and expected part of everyday behavior.

I see three phases in the evolution of E&C education so far:

- **Phase 1: “The Bore Them to Tears with Slides Phase” (1991-2001):** Where we presented endless compliance slides (first transparencies, then PowerPoint), replete with dire warnings about incarceration, always accentuating the negative, and barely ever mentioning ethics. Needless to say, we didn’t win many friends with this approach.
- **Phase 2: “The Jazz Them with Interactivity Phase” (2001-2006):** Where we tried innovative delivery methods to get attention and participation . . . and we did, in many cases, with some really engaging materials. I remember Raytheon’s ethics movie review with critic Ebert and my adaptation of the Family Feud game show into an interactive ethics video suite at Bertelsmann. The ECOA also showcased some very cool training tools including Altria’s “mock” Enron trial video featuring actual participants. These efforts, however, are time-consuming or expensive or both; basically unsustainable or undoable in an era of limited resources or by companies lacking generous E&C budgets.
- **Phase 3: “The Pelt Them to Death with E-Learning Phase” (2006 – to date):** Where we discovered the marvels of automation in education and went wild shoving endless hours of faceless computer training on our exhausted colleagues. But it had that wonderful side-effect of testing and certifying up to 100% of the employee population—always good in case prosecutors show interest in our programs.

So what’s next? Three intertwined concepts: branding, diversification, and integration. We must elevate our game or otherwise risk losing the attention of the most important people in our organizations: our employees.
Branding. Properly branding E&C is about two things: business relevance and positivity. Create business relevance for E&C by branding it to reflect your business priorities. At Verint, we call it “Global Corporate Responsibility” (GCR) and it’s amazing how much more palatable that moniker is to business-people. It’s part of our value system, our organizational DNA (“The Verint Way”), and our annual business strategy, not to mention our customer sales and marketing process. The language of your E&C program needs to be the language of your business. Learn from your sales and marketing force how you can brand your message internally. Develop an actual brand for E&C and display it proudly.

Diversification. Design a diversified package of messaging that is not too oppressive in its impact (e.g., short intermittent bites instead of big gulps) and integrate the messages into a variety of vehicles (management letters, speeches, sales kick-offs, etc.). Mix it up periodically through a combination of e-learning, live training, videos, and slides. Involve your employees in interactive communications, and feature their responses in your messaging.

Integration. No more thinking in silos. E&C will become irrelevant if it is viewed as a necessary (and separate) evil rather than an integrated and savvy business enabler. Always ask: is a specific E&C message useful or relevant to my businesspeople? Reach out to business colleagues throughout your organization and make them part of a network of E&C resources available to all colleagues. Use examples, case studies, and ethical dilemmas relevant to or directly from your business. Always accentuate the positive impact of doing business ethically.

Each of us must find a customized way to combine these three concepts—branding, diversification, and integration—into our E&C messaging. When we do, we will have come a long way from the days of boring them to tears with too many slides, jazzing them with expensive razzle dazzle, and pelting them to death with hours of e-learning. Finding a simple and effective way to connect your E&C education directly to your business will help create that seamless ethical decision-making culture that we all strive to achieve within our organizations.

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