# 2021
# Training Benchmarking Survey Report

RethinkCompliance

# Introduction & Overview

At Rethink Compliance (Rethink), our mission is to help great companies create compelling and effective Compliance & Ethics (C&E) programs. A big part of that mission is providing our clients with attractive, engaging, and modern C&E content — including training and communications to help influence employee culture, attitudes, and actions. We are always looking to learn more about how companies train their employees on C&E-related topics. Who's getting training? How often are they getting it? What training methods work? Which ones do not? To understand the answers to those questions and many more, we launched Rethink's first Training Benchmarking Survey.

Our goals for Rethink's Training Benchmarking Survey were to identify current trends, tools, and leading practices of existing C&E training programs, to use this information to better meet the needs of our clients, and to inform the C&E community at large.

## 38

The survey included 38 questions and addressed topics like:

- Who gets C&E training
- When they receive it
- How much they receive
- What training formats and strategies are deployed
- What support, technology, and tools are used
- How the pandemic has affected C&E training programs

## ↓$500M-↑$15B

Respondents represented organizations of varying size, with annual revenue under $500 million (20%) to over $15 billion (18.4%).

## large+small

Similarly, the survey's respondents included both large employers with over 50,000 employees (17%), and relatively small employers with under 1,000 employees (19%).

## 125

C&E professionals from a wide variety of organizations and industries completed the survey. All told, 125 C&E professionals participated. These respondents primarily came from organizations headquartered in the U.S. (75%), but also from Europe (13%) and other parts of North America (7%). Respondents represented over 20 industries, including:

- Pharmaceuticals and Medical Device
- Technology
- Banking and Financial Services
- Healthcare
- Business and Professional Services

We were pleased with the **variety of participants** in our survey, and their **distinct backgrounds** allowed us to **analyze the results** in a number of ways.

# Who Gets What?
# When? How Much?

In not surprising but welcome news, a large majority of respondents said "all employees" receive C&E training. Zero respondents indicated that **no** employees at their organization get C&E training. These trends were consistent across regions and company size (by both revenue and number of employees).

An additional 11% of respondents said they provide only a subset of employees with C&E training. This particular response makes sense for some industries prominent among these respondents — such as Metals and Mining, Automotive, Food and Beverage, Transportation and Logistics, and Industrial Manufacturing. These organizations, like many of Rethink's clients, are likely to have a diverse set of employees whose compliance-related risk profiles differ.

However, it was surprising to see other industries such as Government, Banking and Financial Services, and Healthcare represented within this subgroup, given that compliance-related risks are likely more broadly applicable in those industries, and a much larger percentage of employees in certain of those sectors are connected to computers.
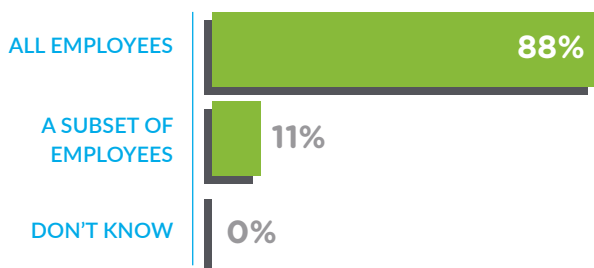
Looking more closely at the training employees receive, 85% of respondents indicated that a subset of their employees receive C&E training that is specific to their risk profile, with no significant variance by region, industry, or company size.

Conversely, 11% of respondents said that their organizations do **not** provide risk-specific training to **any** employees. Among this subset of respondents, more small companies (by revenue and number of employees) are represented, but there was no meaningful trend among this subset in terms of region or industry. Additionally, all of these respondents train "All employees" on C&E topics, generally, which is a good sign from our perspective.

**Which employees at your organization receive C&E training that is specific to their risk profiles?**

HIGH-RISK EMPLOYEES **46%**

PEOPLE MANAGERS **36%**

ALL EMPLOYEES **35%**

SENIOR LEADERS **30%**

NONE **11%**

**Which employees at your organization receive training regarding their C&E responsibilities and behavioral expectations?**

ALL EMPLOYEES **88%**

A SUBSET OF EMPLOYEES **11%**

DON'T KNOW **0%**

# Why Don't Employees Receive Risk-Specific Training?

"Systems and data limitations" is the most common reason employees don't receive risk-specific training. Other respondents cited the difficulty or lack of resources to provide it.

Thankfully, only a very few respondents indicated that management doesn't support risk training, a much more difficult problem to fix than tactical or technical obstacles.

In your opinion, why don't employees at your organization receive C&E training that is specific to their risk profiles?

| | |
|---|---|
| OUR SYSTEM(S) OR DATA DON'T SUPPORT TARGETING TRAINING TO EMPLOYEES BASED ON THEIR DEPARTMENT OR JOB FUNCTION | 43% |
| IT'S TOO DIFFICULT TO MANAGE | 29% |
| WE DON'T HAVE A C&E OR L&D GROUP TO MANAGE IT | 29% |
| IT'S TOO TIME CONSUMING | 14% |
| THIS TYPE OF TRAINING IS NOT SUPPORTED BY MANAGEMENT | 14% |

" The benchmarking data was incredibly helpful to see as an Ethics and Compliance Training professional.  **– WEBINAR PARTICIPANT**

Interestingly, systems and data limitations appear to poison the well for C&E programs, generally. Although they all faced a similar business challenge (i.e., an inability to provide risk-specific training), respondents who cited systems and data problems as a barrier also tended to view their C&E training programs more negatively than those who selected other reasons.
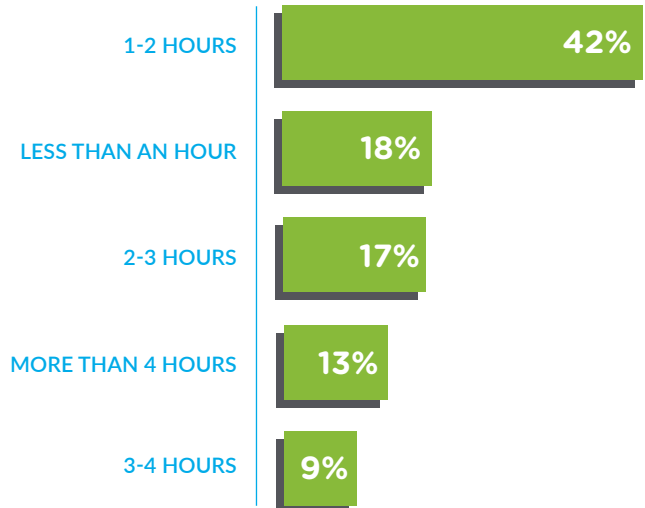
For organizations facing these obstacles, the good news is that there are, in fact, ways to provide employees with risk-specific training, even if your systems and data do not support it. We encourage any organization struggling to deploy targeted training to explore course functionality options for accomplishing this very important goal.

So, how much training are employees receiving? According to respondents, most organizations (59%) provide their employees with two or fewer hours of C&E training per year. That said, in some industries, a majority of respondents provide employees with *more* than two hours of training, including:

- Banking and Financial Services (55%)
- Business and Professional Services (75%)
- Pharmaceuticals and Medical Device (57%)

These industries are heavily regulated, so a bigger commitment to training makes sense. Typically, in Rethink's experience, the more regulated the industry, the more training is required.

## Overall, on average, how much time annually do most employees spend participating in C&E training at your organization?

| | |
|---|---|
| 1-2 HOURS | 42% |
| LESS THAN AN HOUR | 18% |
| 2-3 HOURS | 17% |
| MORE THAN 4 HOURS | 13% |
| 3-4 HOURS | 9% |

Interestingly, there does not appear to be any correlation between the amount of training employees receive and the length of training courses that are deployed (short courses versus medium-length courses versus long courses). So, while most respondents provide fewer than two hours of training, they are doing so using a mix of approaches. Respondents tended to favor medium-length courses and short courses over quick communications and long courses. And, these trends were consistent across industries, regions, and company size (by both revenue and number of employees).
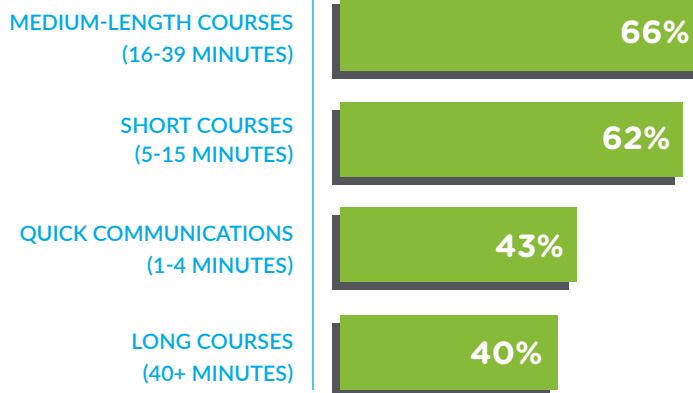
"This was great and informative. I feel participating in the survey makes this information and discussion really relevant and helpful.   - WEBINAR PARTICIPANT

In our experience, clients with a more modern approach to C&E training are embracing shorter initiatives in an effort to maintain both employee engagement and retention. *Effective C&E training can, in fact, communicate required information in a much more efficient manner.* Short courses and quick communications also enable C&E teams to "get in front of" employees more often and address additional topics, which is a win/win strategy.

**Which of the following does your organization include in its C&E training program?**

MEDIUM-LENGTH COURSES
(16-39 MINUTES)
**66%**

SHORT COURSES
(5-15 MINUTES)
**62%**

QUICK COMMUNICATIONS
(1-4 MINUTES)
**43%**

LONG COURSES
(40+ MINUTES)
**40%**

Looking at which companies train *other* stakeholders, most respondents train their boards, but that number was lower than we expected, given the various guidance available, including the U.S. Federal Sentencing Guidelines for Organizations (Sentencing Guidelines).

Interestingly, 80% of respondents from Europe indicated that they train their boards, while only 56% of respondents based in the U.S. do the same. Most respondents (62%) indicated they deploy live training to their boards, while other respondents (26%) provide their boards with self-paced, online training. Based on our work with boards, we were not surprised to see that few companies provide their board members with eLearning.

Overall, although we certainly understand the challenges C&E officers face getting board attention, this is an area in which we encourage improvement across the spectrum. Remember: board training can be succinct, provided in stages, and "disguised" in your periodic C&E board briefings.

**Does your organization provide C&E training to its Board of Directors (or other governing authority)?**

YES
**51%**

NO
**35%**

DON'T KNOW
**14%**
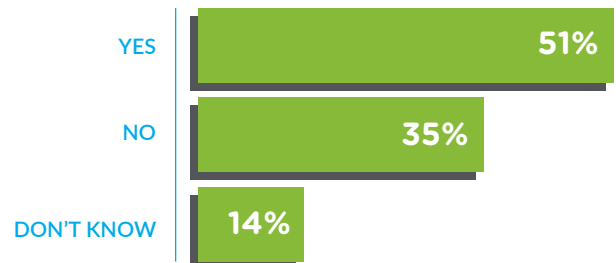
We were a bit taken aback to see that a majority of respondents indicated that they **do not** require training for third parties. Given that (i) the 2020 guidance from the U.S. Department of Justice (DOJ) suggests organizations should train their third parties and (ii) the Sentencing Guidelines call out training of agents, "as necessary," it's perplexing that so many organizations are not doing so.

**Does your organization require C&E training for third parties?**

YES
**55%**

NO
**37%**

DON'T KNOW
**8%**
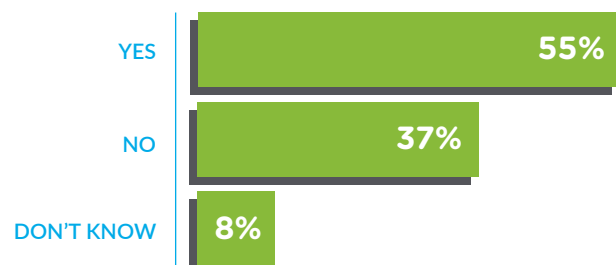
For those companies that do train third parties, 41% do so annually, while 17% train third parties as part of their on-boarding. An additional 33% said the frequency of third-party training depended on the third party's risk profile.

While we view the number of respondents training their boards and third parties to be relatively low, once organizations begin to provide training to stakeholders beyond employees, they are more likely to reach others in their ecosystem as well. For example, of those respondents who train third parties, the vast majority also train their boards.

> "
>
> Thank you for the great information, especially around the analytics!
>
> **– WEBINAR PARTICIPANT**

**If your organization trains third parties, do you train the Board of Directors?**

24%*

DON'T TRAIN BOARD OF DIRECTORS

76%*

TRAIN BOARD OF DIRECTORS
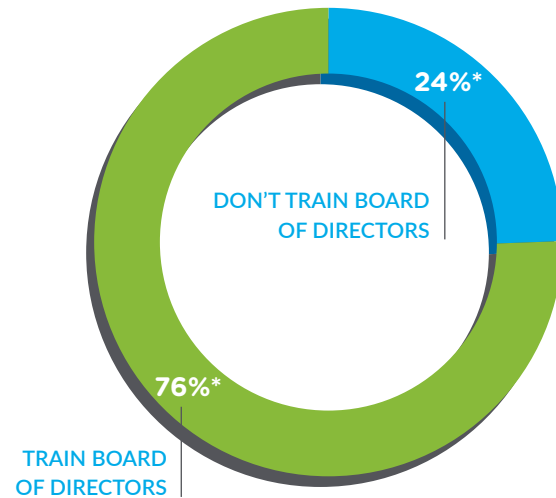
*Of companies that train third parties

# Achievers Mix It Up!

One noteworthy observation: we found that there is a clear relationship between training effectiveness and training methods.

As part of the survey, we asked respondents to rate the effectiveness of their C&E training program from 1 to 10, with "1" being the worst score and "10" being the best score. Fourteen percent (14%) of respondents ranked their programs 1-4, and we refer to this group as "Strivers." Fifty-three percent (53%) of respondents ranked their C&E training 5-7; we refer to this group as "Middlers." Finally, 33% of respondents ranked their training programs 8-9. We refer to this last group as "Achievers." (Note that no one gave their programs a "perfect 10.")

Overall, it was clear that Achievers do more to "mix it up" when compared to Middlers and Strivers.

That is, they are more likely to use different training formats, approaches, and resources. We assume this differentiator comes from a focus by Achievers on keeping their training fresh and engaging; and, if their self-ratings are any indication, they are successful.

For example, Achievers are more likely to provide **all** of their employees with risk-specific training, rather than broad, generally applicable C&E training. Conversely, a smaller percentage of Middlers and even fewer Strivers indicated they provide risk-specific training to all employees. With the DOJ's focus on role-based, control owner, and manager training, we encourage Middlers and Strivers to address any obstacles to providing risk-specific training — and soon.

Achievers are also more likely to use different training formats. In our experience, companies who deploy multiple training formats are more likely to actually "reach" their employees in a meaningful way.

Interestingly, Strivers are much more likely to pick one format and use it exclusively — which means that Strivers **aren't** mixing it up. Across the board, of those who use both live and online training, most respondents indicated they tend to use more online than they do live.

## Percentage of respondents who provide risk-specific training to "all employees"

- ACHIEVERS: 44%
- MIDDLERS: 34%
- STRIVERS: 18%

## Percentage of respondents who use both live and online training

- ACHIEVERS: 63%
- MIDDLERS: 57%
- STRIVERS: 35%
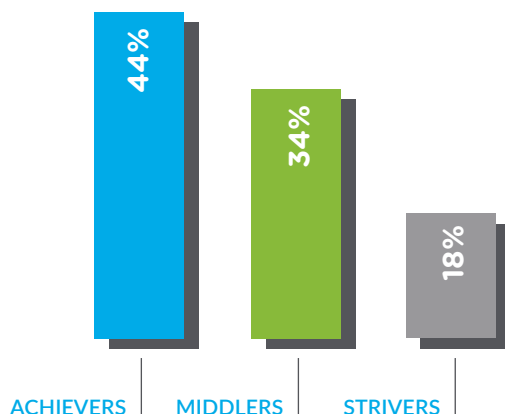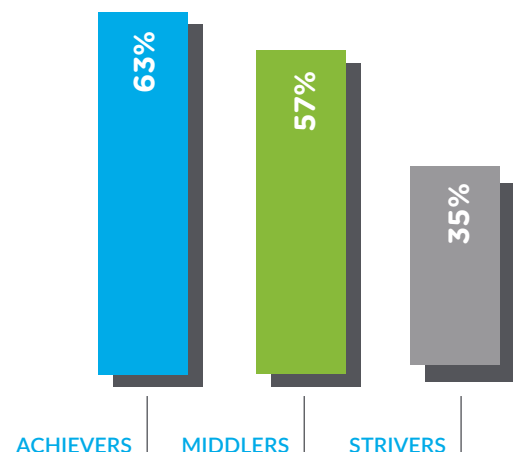
Overall, the adoption of more modern training approaches is low, with only 30% of all respondents indicating they've used humor in their training, and only 22% of all respondents indicating they've integrated gamification into their training. However, Achievers are more likely to adopt these approaches than Middlers and Strivers.

At Rethink, we believe that it's imperative to create content that will actually reach, engage, and influence your stakeholders — and their expectations have changed in this digital age. Not only do people digest information in smaller bites in 2021, but they expect polished and engaging content — humor and gamification are two examples.

**Percentage of respondents who have integrated humor into their training**
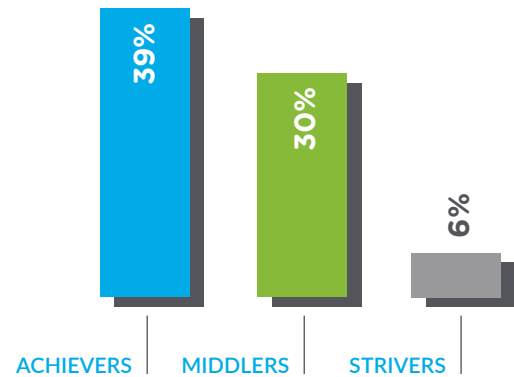
- 39% ACHIEVERS
- 30% MIDDLERS
- 6% STRIVERS

**Percentage of respondents who have integrated gamification into their training**

- 29% ACHIEVERS
- 22% MIDDLERS
- 0% STRIVERS
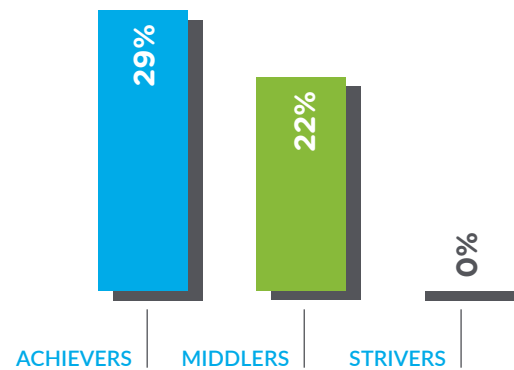
Achievers are also more likely to seek employees' opinions through their training programs, as compared to Middlers and Strivers.

At Rethink, we know that C&E departments are consistently challenged to do more with less. Organizations with more mature programs strive to get as much as possible out of their C&E training programs.

That can — and should — mean using training initiatives not only to push information *to* employees, but also to pull information *from* employees. Our Drive Analytics™ service is a great example — please visit www.rethinkcompliance.com for more information.

Additionally, Achievers are more likely to deploy **both** internally-developed and vendor-developed training than the less effective C&E training programs of their counterparts, once again demonstrating Achievers are more likely to "mix it up." Middlers and Strivers are well advised to take cues from their higher-achieving peers to increase the effectiveness of their C&E training programs.

**Percentage of respondents who use both vendor-developed and internally developed materials**

46%
39%
24%

ACHIEVERS    MIDDLERS    STRIVERS

**Percentage of respondents who seek employees' opinions in their training**

22%
16%
6%

ACHIEVERS    MIDDLERS    STRIVERS
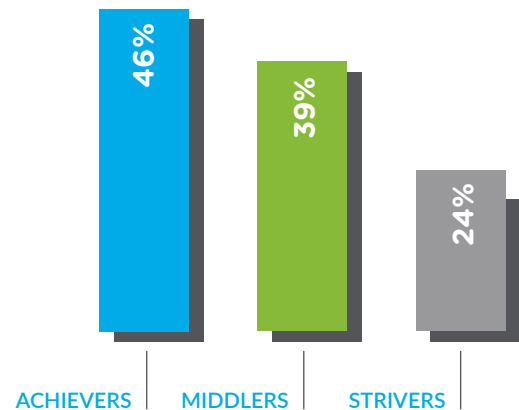
# Vendors Can Help!

One other thing about Achievers: while they are slightly more likely (68%) to *partner* with vendors compared to Middlers (64%) and Strivers (53%), Achievers are much more likely to *be satisfied* with their vendor experiences than Middlers and, especially, Strivers.

Simply put, Achievers seem to demand **more** from their compliance resources. Here, a multi-vendor strategy can help. By buying compliance training from multiple companies, Achievers are also in a position to learn about and benefit from a greater range of new and innovative approaches as they are developed.

**Percentage of respondents who are satisfied with their vendor relationships**

75% ACHIEVERS
35% MIDDLERS
0% STRIVERS

**Percentage of respondents who are not satisfied with their vendor relationships**

12% MULTIPLE VENDORS
21% ONE VENDOR
12% VENDOR & INTERNAL
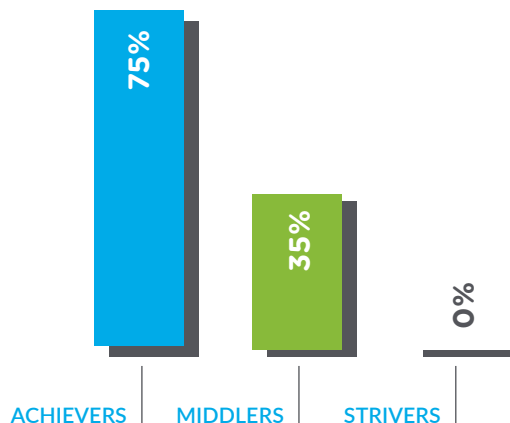
Overall, 40% of respondents indicated they use both vendor-developed and internally-developed training, 36% exclusively develop training in-house, 14% partner with multiple vendors to develop training, and 11% partner exclusively with one vendor to develop training. Of those respondents who use one or more vendors to develop training, 13% were not satisfied.

Interestingly, those respondents who rely exclusively on one vendor relationship are more likely to be dissatisfied by their experience than those who use multiple vendors or develop training both with a vendor and internally. To us, this seems to align with the finding that Achievers mix it up — with their course formats *and* with their vendors.

**When asked what limits satisfaction with their vendors, the most common reasons respondents cited were:**

**50%** "Inflexible customization options"

**48%** "Too expensive"

**27%** "Lack of compliance expertise"

**23%** "Long turn-around times"

Specifically, when asked to elaborate, respondents noted that their vendor experience included:

- "Dated content and limited customization"
- "Generic courses [that] lack maximum interest"
- "Not the precise training we are looking for"
- "Training reads like it is written by lawyers … and is not relevant to my organization"

Perhaps not surprisingly, these are not new complaints in the C&E training space. In fact, these are many of the factors that drove us to start Rethink in the first place — because we believed there could be a better way.

# What's the Deal With Data Analytics?

Given the recent guidance from the DOJ, we also took a close look at how organizations capture and analyze data in their C&E training programs.

It turns out a majority of respondents do capture and analyze data from their C&E training programs. And, of those who aren't currently doing so, a majority indicated that they would like to.

It's also worth noting that 66% of Achievers capture and analyze training data, yet only 47% of Strivers do so. This data point continues to demonstrate the theme of Achievers pushing for more from their programs.

**Do you capture and analyze data from your C&E training program?**

| | |
|---|---|
| YES | 58% |
| NO, BUT WE WANT TO | 40% |
| DON'T KNOW | 1% |
| NO, I DON'T SEE THE POINT | 1% |
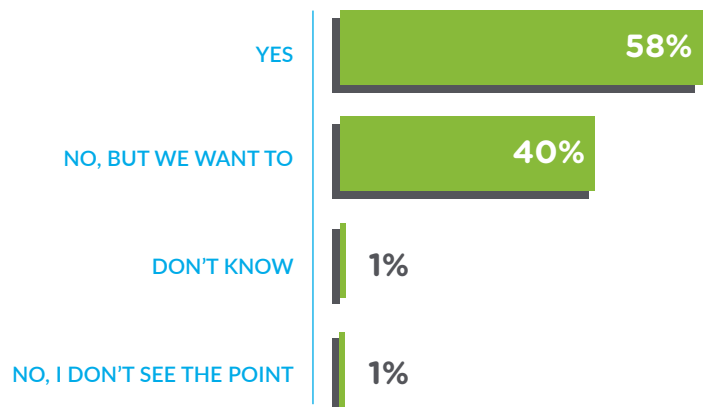
That said, those respondents who *are* applying data analytics to their C&E training are still in the process of establishing these programs. For example, of those respondents who **do** use data analytics today, about half are having a hard time with the data.

In other words, only one quarter of **all** respondents are currently satisfied with the analytics they get from their C&E training programs.

In our view, there is a huge opportunity for most organizations to improve this area of their C&E training programs.

So, what is holding respondents back?

First off, most respondents who use data analytics in their C&E training programs are not getting as much data as they would like (66%). Additionally, it appears the data that respondents collect can be difficult to process and decipher. For example, a majority of respondents indicated that they did not have a dashboard for their data, and almost a third indicated that the data analytics available to them are "off the shelf" and "not tailored to [their] organization or needs."

## 1/3

A third of respondents indicated that it was too challenging to both "slice and dice the data" and "decipher what the data means/is telling [them]." Finally, respondents indicated they do not get support in analyzing the data, spotting trends, or identifying useful insights.

## 80%

When asked what would improve their experience with data analytics, 80% of respondents selected either one or more of the following:
- Analysis support
- Setup support
- Ability to customize data points

These responses indicate to us that companies need more support from their vendors when it comes to their data analytics. In our opinion, there is little value in gathering data for gathering data's sake. The magic is in *what the data tells* your C&E team — and, too often, it's very challenging to understand the story behind data analytics.

## In your opinion, why aren't the data analytics associated with your C&E training program easy to use?

| | |
|---|---|
| THERE IS NO DASHBOARD | **54%** |
| WE DO NOT GET SUPPORT IN ANALYZING THE DATA, SPOTTING TRENDS, OR IDENTIFYING USEFUL INSIGHTS | **34%** |
| IT'S TOO CHALLENGING TO DECIPHER WHAT THE DATA MEANS/IS TELLING US | **32%** |
| IT'S TOO CHALLENGING TO SLICE AND DICE THE DATA | **32%** |

| | |
|---|---|
| THE DATA ANALYTICS THAT ARE AVAILABLE ARE "OFF-THE-SHELF" AND NOT TAILORED TO OUR ORGANIZATION OR NEEDS | **30%** |
| WE DID NOT GET ADVICE ON HOW TO SET UP THE DATA ANALYTICS TO CAPTURE INFORMATION THAT WOULD BE USEFUL FOR OUR PROGRAM AND GOALS | **20%** |
| THE DASHBOARD IS CONFUSING OR HARD TO USE | **18%** |

At Rethink, we strive to support our clients not only in the collection of C&E training program data but also in the interpretation of that data, and what it might mean for our clients' C&E programs.

## Which of the following would have improved your [data analytics] experience?



80% chose 1 or more of these
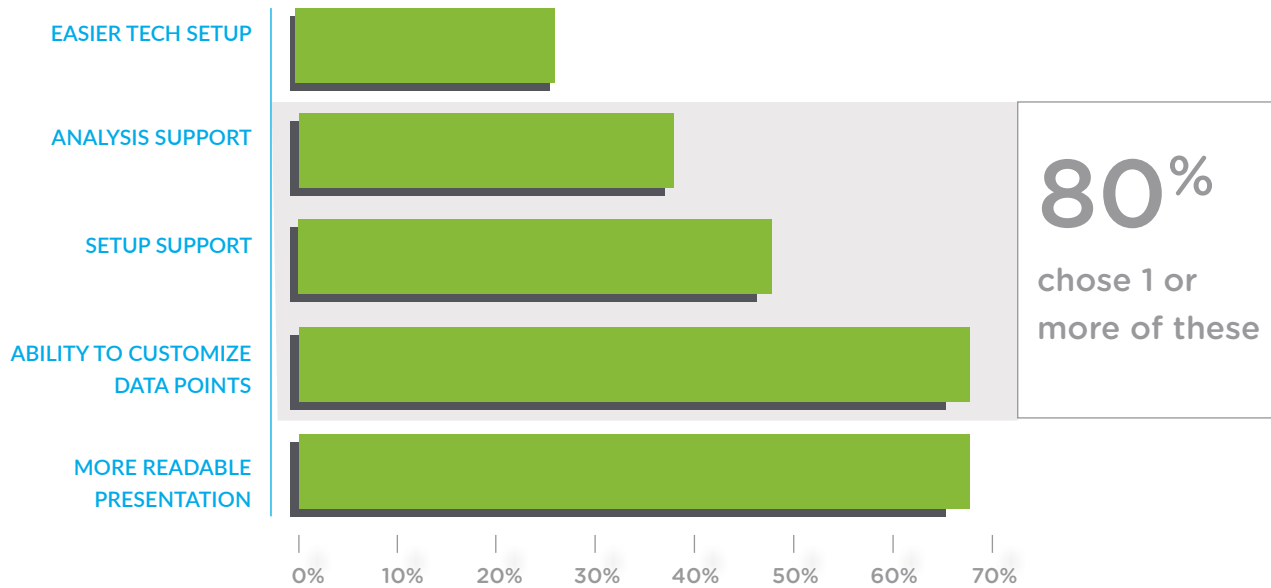
With respect to what types of data organizations are collecting, almost two thirds of respondents use solely quantitative data (counts, dates, and averages), and very few respondents rely solely on qualitative data (insights, reasons, and recommendations).

There is power and value in both types of data analytics. In fact, each type only paints part of the overall picture.

We encourage everyone to follow the 20% of respondents who employ both qualitative *and* quantitative data analytics in their C&E training programs. Doing so provides insight into both what your C&E programs are accomplishing and how those activities are perceived within your organization.

As to what organizations are *doing* with their data, respondents made clear that they see the value of data analytics in shaping, defending, and improving their C&E programs.

Of note: The answer choices respondents selected most often are high-level, programmatic goals, as opposed to gathering data specific to employees or individuals. These response rates were similar for both respondents who collect data today and those who wish to in the future.

Anecdotally, a lot of the C&E professionals we have spoken to over the last year are very interested in data analytics, but they aren't sure where to get it or what it could realistically tell them. The data from our survey and our experience with clients suggest that our industry is still grappling with how to collect, use, and deploy insights from data analytics — in various elements of a C&E program, including C&E training. In all likelihood, we'll collectively align and arrive at a mature approach over time.

**Which best describes the type of data analytics associated with your C&E training program?**

| | |
|---|---|
| QUANTITATIVE METRICS (SUCH AS COUNTS, DATES, AND AVERAGES) | 64% |
| BOTH | 20% |
| QUALITATIVE INFORMATION (SUCH AS INSIGHTS, REASONS, AND RECOMMENDATIONS) | 9% |
| DON'T KNOW | 7% |

**What specific value do you get (or hope to get) from the data analytics associated with your C&E training program? "The C&E training data analytics help (or should help) me _____."**

| | |
|---|---|
| IMPROVE OUR C&E TRAINING CONTENT, FREQUENCY, ENGAGEMENT, OR RELEVANCE | 78% |
| ASSESS THE EFFECTIVENESS OF OUR C&E TRAINING PROGRAM | 75% |
| EVALUATE OVERALL C&E CULTURE AND BEHAVIOR TRENDS | 66% |
| ASSESS THE EFFECTIVENESS OF OUR OVERALL C&E PROGRAM (I.E. BEYOND JUST TRAINING) | 65% |
| IDENTIFY POTENTIAL C&E-RELATED RISKS | 63% |
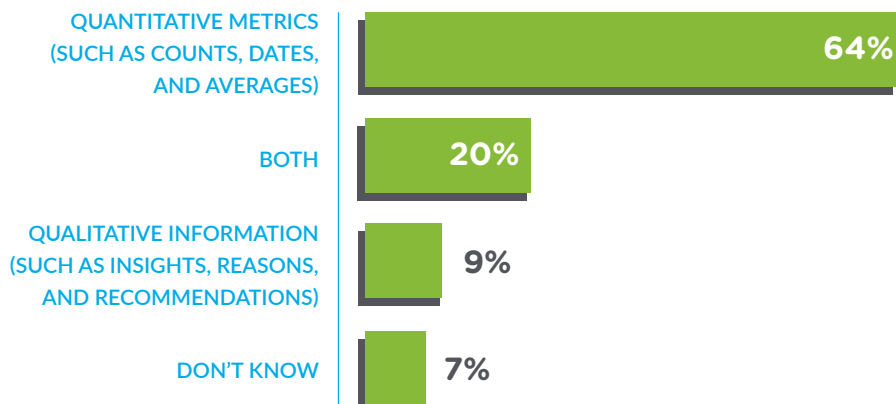
# Compliance in the Time of COVID-19

Finally, we wanted to look at how the global pandemic has affected respondents' C&E training programs.

We were pleased to see that a majority of respondents indicated that the pandemic has had no effect on their C&E training programs. Where there *was* an impact, changes to training topics was the most common effect selected. Both of these trends were consistent across region, industry, and company size.

Some industries did see pandemic-related budget cuts more than others, including Travel and Leisure where *all* respondents indicated they experienced a decrease in budget. Other industries that experienced a decrease in budget for C&E training included:

- Aerospace and Defense
- Chemicals
- Food and Beverage
- Medical Device

In our opinion, now is certainly not the time for companies to be cutting back on any C&E efforts. As pressure and uncertainty rise, so does the potential for wrongdoing — as we have seen in the past, after 9/11 and the global financial crisis, for example.

If your budget has been cut, we would encourage you to use this benchmarking data to make your case that your company should, at the very least, be "keeping up with the Joneses" in this critical time.

## How has the global pandemic affected your C&E training program?

| | |
|---|---|
| IT HAS HAD NO EFFECT ON OUR C&E TRAINING | 53% |
| THE TOPICS ON WHICH WE FOCUS HAS CHANGED | 22% |
| WE ARE PROVIDING LESS C&E TRAINING | 15% |
| OUR BUDGET FOR C&E TRAINING HAS DECREASED | 14% |
| WE ARE PROVIDING MORE C&E TRAINING | 10% |
| OUR BUDGET FOR C&E TRAINING HAS INCREASED | 2% |
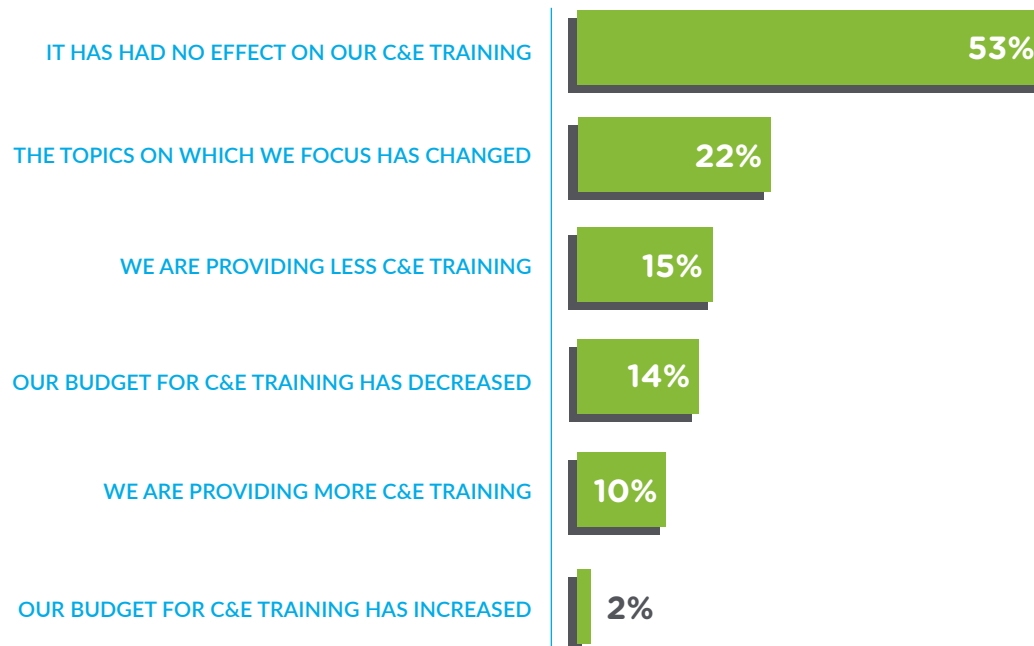
# About Rethink Compliance

**Thank you to all of the C&E professionals who participated in Rethink's first Training Benchmarking Survey.** You will find the response totals for every survey question in the Appendix that follows this report. We hope you found the insights as interesting as we did and that they are helpful as you shape your 2021 C&E training programs.

## A Modern Approach to Compliance

Rethink Compliance is an innovative, service-focused compliance vendor combining deep compliance expertise with the creative talent of a design studio. We use modern technology and communications approaches to help companies build strong and effective compliance programs, from Code and policy work to library and custom training to advisory and consulting services.

Rethink Compliance is women-owned and serves companies around the globe, with clients headquartered in the U.S., UK, EU, and Asia. Our leadership team is made up of recognized thought leaders with decades of compliance experience.

**Kirsten Liston**
Founder and Principal

**Proud Member**
WBENC-Certified WBE

**Contact Us**
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# Appendix

## In what region is your organization headquartered?

| Region | Percentage |
|---|---|
| UNITED STATES | 74.8% |
| EUROPE | 13.0% |
| NORTH AMERICA (EXCLUDING UNITED STATES) | 7.3% |
| ASIA PACIFIC (EXCLUDING AUSTRALIA/ NEWZEALAND/OCEANIA) | 2.4% |
| AFRICA | 0.8% |
| CENTRAL OR SOUTH AMERICA | 0.8% |
| MIDDLE EAST | 0.8% |
| AUSTRALIA/NEW ZEALAND/OCEANIA | 0% |
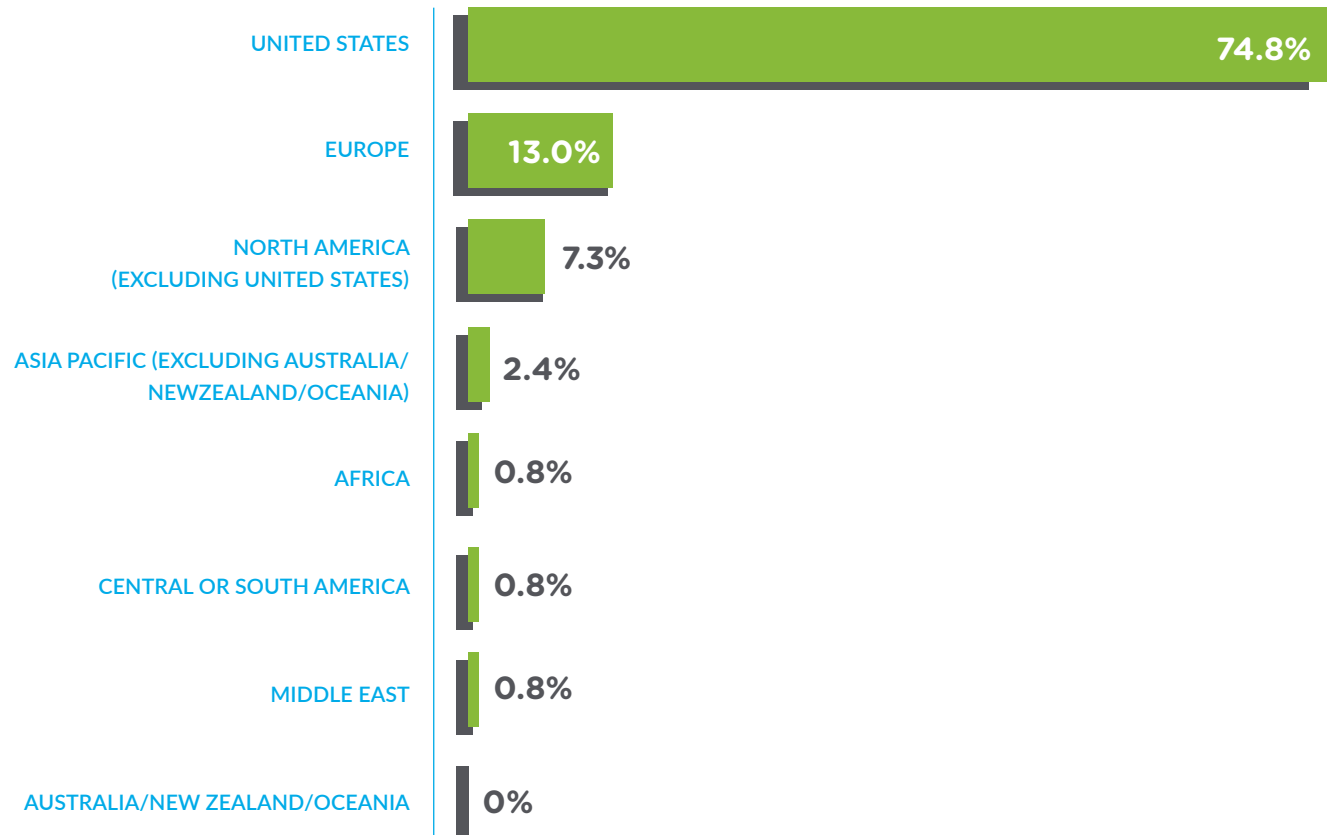
## Which of the following most closely describes your organization's industry?

| Industry | % |
|---|---|
| PHARMACEUTICALS/BIOTECHNOLOGY | 9.6% |
| TECHNOLOGY | 9.6% |
| BANKING/FINANCIAL SERVICES | 7.8% |
| BUSINESS/PROFESSIONAL SERVICES | 7.0% |
| ENERGY/UTILITIES | 7.0% |
| HEALTHCARE PROVIDER | 6.1% |
| INDUSTRIAL MANUFACTURING | 6.1% |
| RETAIL AND CONSUMER | 6.1% |
| CONSTRUCTION/PROPERTY MANAGEMENT/REAL ESTATE | 5.2% |
| NONPROFIT/CHARITABLE/INDUSTRY GROUP | 5.2% |
| MEDICAL DEVICE | 3.5% |
| OTHER | 3.5% |
| AEROSPACE AND DEFENSE | 2.6% |
| FOOD AND BEVERAGE | 2.6% |
| INSURANCE | 2.6% |
| METALS AND MINING | 2.6% |
| TELECOMMUNICATIONS | 2.6% |
| TRAVEL AND LEISURE | 2.6% |
| AUTOMOTIVE | 1.7% |
| CHEMICALS | 1.7% |
| GOVERNMENT | 1.7% |
| TRANSPORTATION AND LOGISTICS | 1.7% |
| HEALTHCARE PAYER | 0.9% |
| OIL AND GAS | 0.0% |

## What is the approximate annual revenue of your organization in U.S. dollars?

| | |
|---|---|
| $15 BILLION OR ABOVE | 18.4% |
| $5 BILLION TO $14.99 BILLION | 13.6% |
| $2 BILLION TO $4.99 BILLION | 20.0% |
| $500 MILLION TO $1.9 BILLION | 17.6% |
| UNDER $500 MILLION | 20.0% |
| DON'T KNOW | 10.4% |
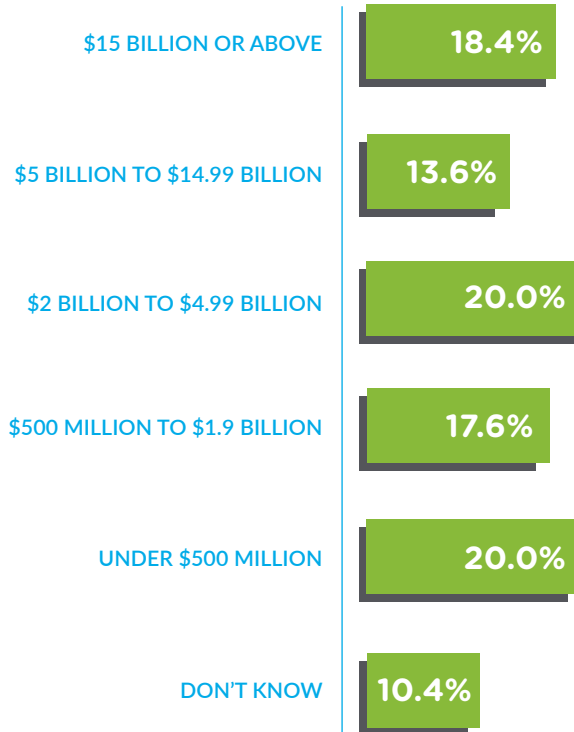
## How many employees work in your organization, globally?
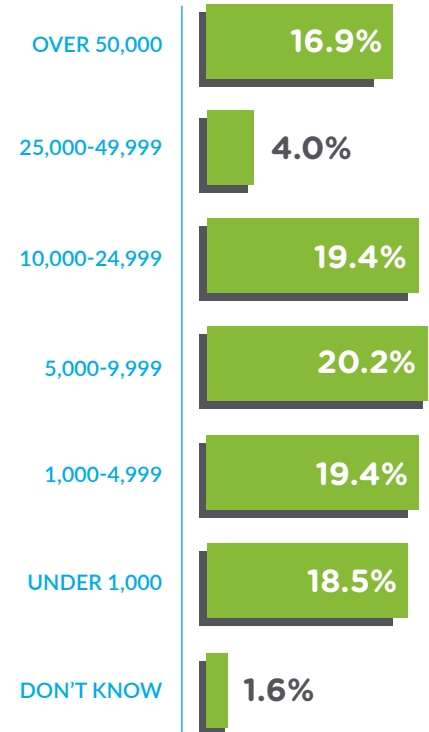
| | |
|---|---|
| OVER 50,000 | 16.9% |
| 25,000-49,999 | 4.0% |
| 10,000-24,999 | 19.4% |
| 5,000-9,999 | 20.2% |
| 1,000-4,999 | 19.4% |
| UNDER 1,000 | 18.5% |
| DON'T KNOW | 1.6% |

## Which employees at your organization receive training regarding their C&E responsibilities and behavioral expectations?

| | |
|---|---|
| ALL EMPLOYEES | 88.0% |
| A SUBSET OF EMPLOYEES | 11.2% |
| DON'T KNOW | 0.8% |
| NONE | 0.0% |

## Which employees at your organization receive C&E training that is **specific to their risk profiles**?

| | |
|---|---|
| HIGH-RISK EMPLOYEES | 45.6% |
| PEOPLE MANAGERS | 36.0% |
| ALL EMPLOYEES | 35.2% |
| SENIOR LEADERS | 29.6% |

| | |
|---|---|
| NONE | 11.2% |
| EMPLOYEES WITH EMAIL ADDRESSES AND/OR INTERNET ACCESS | 9.6% |
| DON'T KNOW | 4.0% |

## In your opinion, *why don't* employees at your organization receive C&E training that is specific to their risk profiles?

| | |
|---|---|
| OUR SYSTEM(S) OR DATA DON'T SUPPORT TARGETING TRAINING TO EMPLOYEES BASED ON THEIR DEPARTMENT OR JOB FUNCTION | 42.9% |
| IT'S TOO DIFFICULT TO MANAGE | 28.6% |
| WE DON'T HAVE A C&E OR L&D GROUP TO MANAGE IT | 28.6% |
| IT'S TOO TIME-CONSUMING | 14.3% |
| THIS TYPE OF TRAINING IS NOT SUPPORTED BY MANAGEMENT | 14.3% |
| DON'T KNOW | 7.1% |
| IT'S TOO EXPENSIVE | 0.0% |

**Does your organization provide C&E training to its Board of Directors (or other governing authority)?**

51.2% YES

35.2% NO

13.6% DON'T KNOW
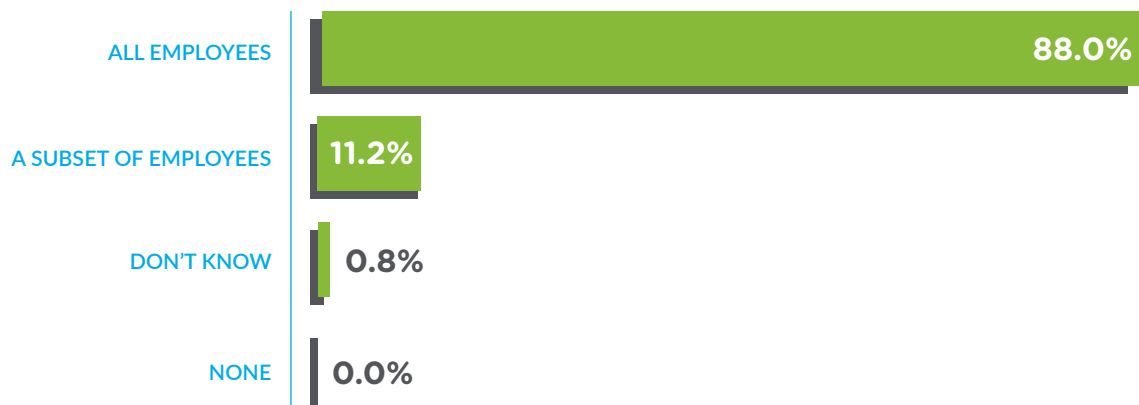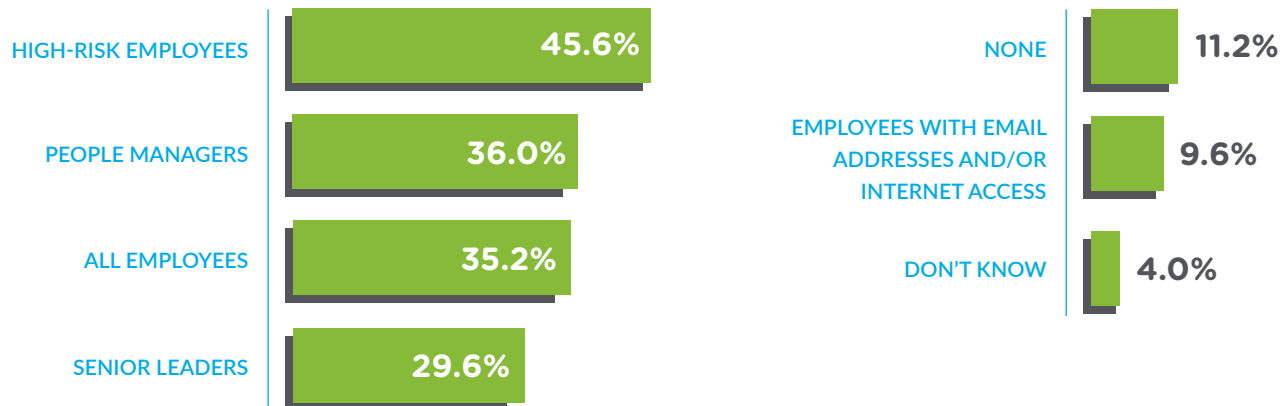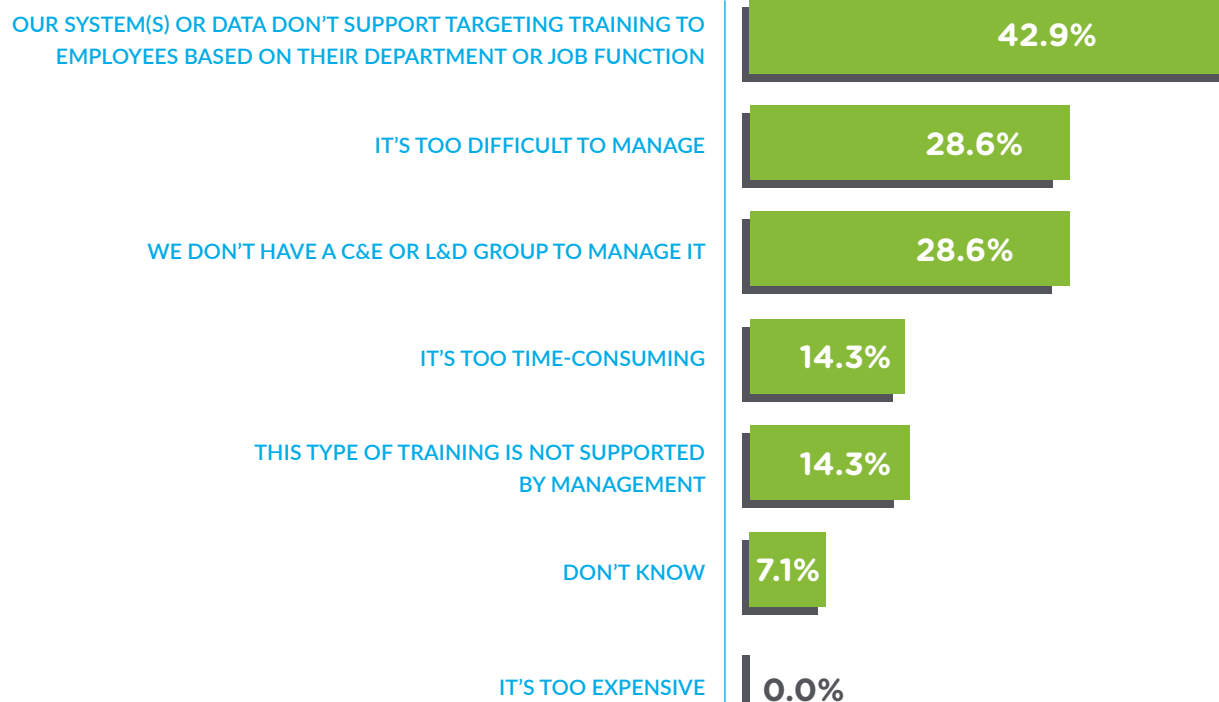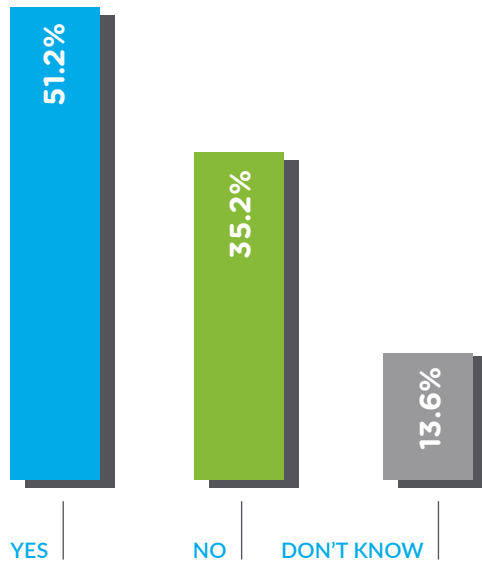
**Which of the following best describes how your organization provides C&E training to its Board of Directors (or other governing authority)?**

WE PROVIDE PERIODIC, LIVE (WEBINAR OR IN PERSON) BOARD TRAINING — 48.4%

WE PROVIDE REGULAR, SELF-PACED ONLINE BOARD TRAINING — 20.3%

WE PROVIDE REGULAR, LIVE (WEBINAR OR IN PERSON) BOARD TRAINING — 14.1%

DON'T KNOW — 10.9%

WE PROVIDE PERIODIC, SELF-PACED ONLINE BOARD TRAINING — 6.2%

**Does your organization require C&E training for third parties?**

55.2% YES

36.8% NO

8.0% DON'T KNOW
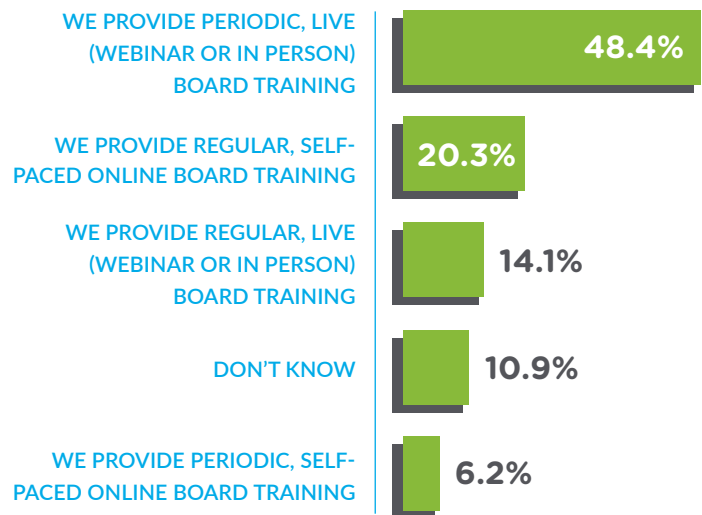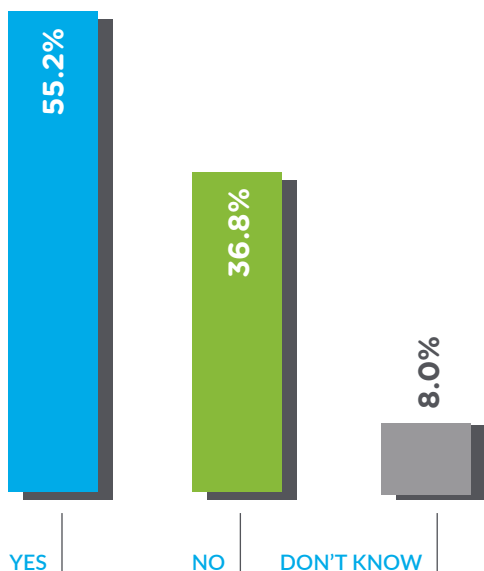
**How often do you require C&E training for third parties?**

ANNUALLY — 41.3%

IT DEPENDS (I.E. BY TYPE OF THIRD PARTY, OR WHEN RISK PROFILES CHANGE) — 32.6%

AS PART OF ONBOARDING — 17.4%

DON'T KNOW — 4.3%

MORE THAN ONCE A YEAR — 4.3%
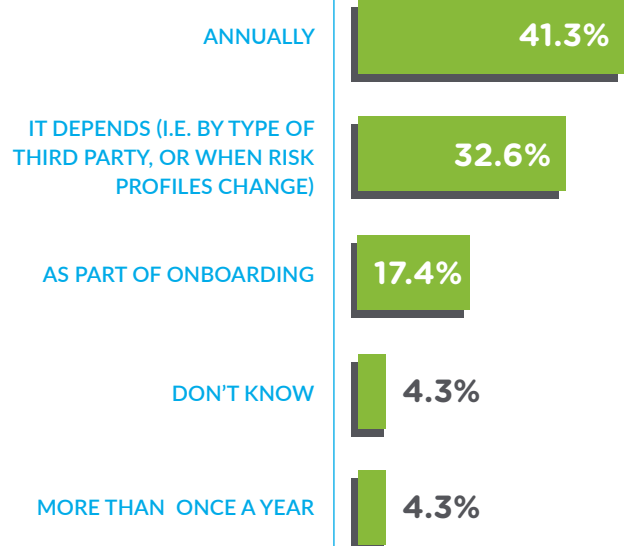
**How soon after joining your organization do new employees (including those who join via merger or acquisition) receive C&E training?**
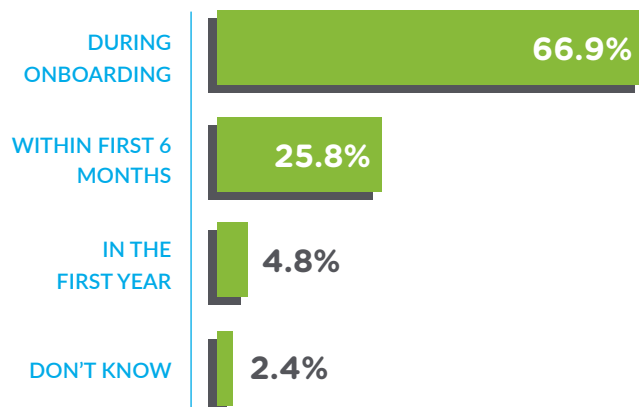
| | |
|---|---|
| DURING ONBOARDING | 66.9% |
| WITHIN FIRST 6 MONTHS | 25.8% |
| IN THE FIRST YEAR | 4.8% |
| DON'T KNOW | 2.4% |

**Overall, on average, how much time annually do most employees spend participating in C&E training at your organization?**

| | |
|---|---|
| MORE THAN 4 HOURS | 12.8% |
| 3-4 HOURS | 8.8% |
| 2-3 HOURS | 16.8% |
| 1-2 HOURS | 41.6% |
| LESS THAN AN HOUR | 17.6% |
| DON'T KNOW | 2.4% |
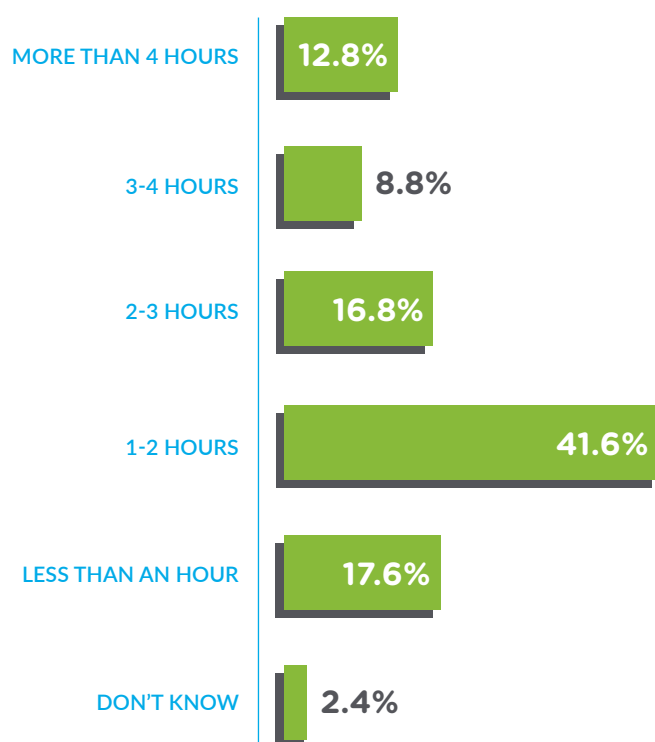
**How often do employees at your organization receive Code of Conduct training?**

| | |
|---|---|
| ANNUALLY | 69.4% |
| EVERY TWO YEARS | 12.9% |
| DURING ONBOARDING | 5.6% |
| EVERY THREE YEARS | 4.8% |
| DON'T KNOW | 2.4% |
| NEVER | 2.4% |
| ONLY WHEN THERE IS A NEW OR UPDATED CODE OF CONDUCT POLICY | 2.4% |
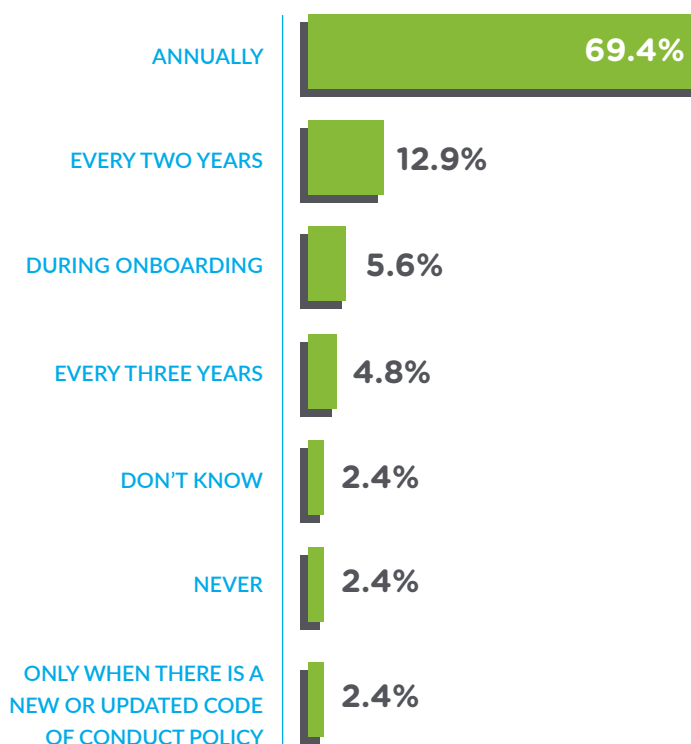
**In what format(s) do employees at your organization receive C&E training?**

| | |
|---|---|
| BOTH | 56.0% |
| SELF-PACED ONLINE COURSES | 33.6% |
| LIVE, WHETHER VIA WEBINAR OR IN PERSON | 10.4% |
| DON'T KNOW | 0.0% |
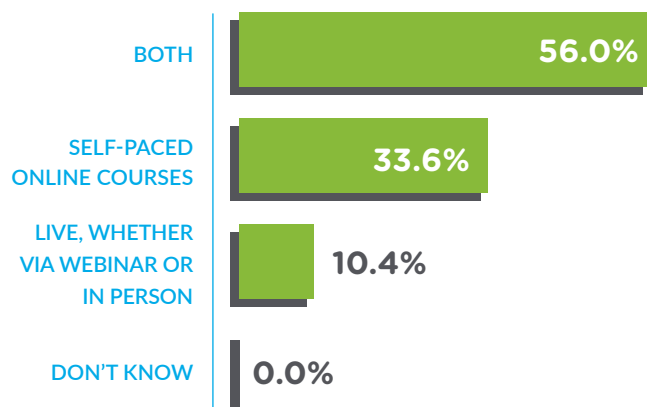
**What's the mix?** How much of your organization's C&E training is self-paced **online** training versus **live** via webinar or in person?

2.0 AVERAGE RATING



| 37.1% | 35.7% | 18.6% | 5.7% | 2.9% |
| 1 | 2 | 3 | 4 | 5 |
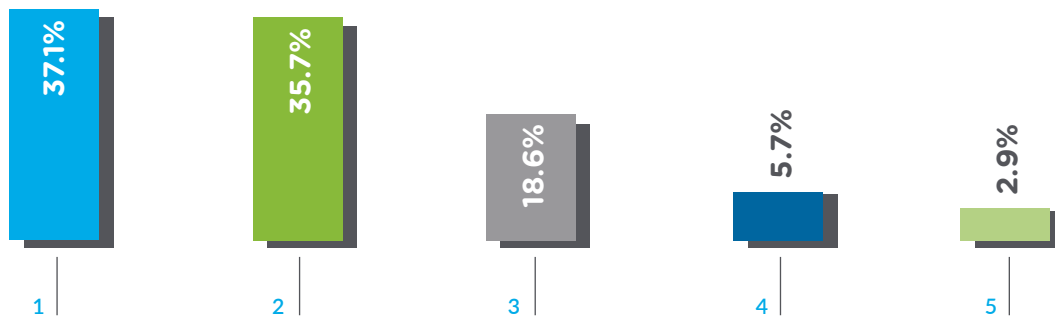
MOSTLY ONLINE          ABOUT EQUAL          MOSTLY LIVE

---

**Which of the following does your organization include in its C&E training program?**



| | |
|---|---|
| MEDIUM-LENGTH COURSES (16-39 MINUTES) | 66.4% |
| SHORT COURSES (5-15 MINUTES) | 62.4% |
| QUICK COMMUNICATIONS (1-4 MINUTES) | 43.2% |
| LONG COURSES (40+ MINUTES) | 40.0% |

## Which of the following **approaches and tools** does your organization include in its C&E training program?

| Approach / Tool | Percentage |
|---|---|
| QUESTIONS TO TEST EMPLOYEE KNOWLEDGE OR MATERIALS PRESENTED | 81.6% |
| CERTIFICATIONS OR ATTESTATIONS | 72.8% |
| "REAL LIFE" SCENARIOS BASED ON ACTUAL MISCONDUCT THAT OCCURRED AT YOUR ORGANIZATION OR ANOTHER | 65.6% |
| FINAL TESTS | 52.0% |
| ANIMATED VIDEOS | 46.4% |
| LIVE ACTION VIDEOS | 33.6% |
| HUMOR | 29.6% |
| GAMIFICATION | 21.6% |
| QUESTIONS SEEKING EMPLOYEE OPINIONS | 16.8% |
| TEST-OUT FUNCTIONALITY | 11.2% |
| OTHER | 4.0% |
| CHAT BOTS | 0.8% |
| NONE OF THE ABOVE | 0.0% |

**Which of the following best describes your organization's use of a learning management system (LMS) for C&E training?**

WE USE AN ENTERPRISE-WIDE LMS FOR ALL OUR TRAINING NEEDS (I.E. C&E AND ALL OTHER TRAINING) — **65.3%**

WE USE THE LMS OF ONE OF OUR C&E TRAINING VENDORS — **22.6%**

WE DON'T USE AN LMS — **11.3%**

DON'T KNOW — **0.8%**

**How much mobile?** To your knowledge, how many of your learners complete your C&E training on mobile devices (phones, tablets) vs desktop/laptop computers?

1.6 AVERAGE RATING

1 — 57.1%
2 — 28.6%
3 — 11.8%
4 — 1.7%
5 — 0.8%
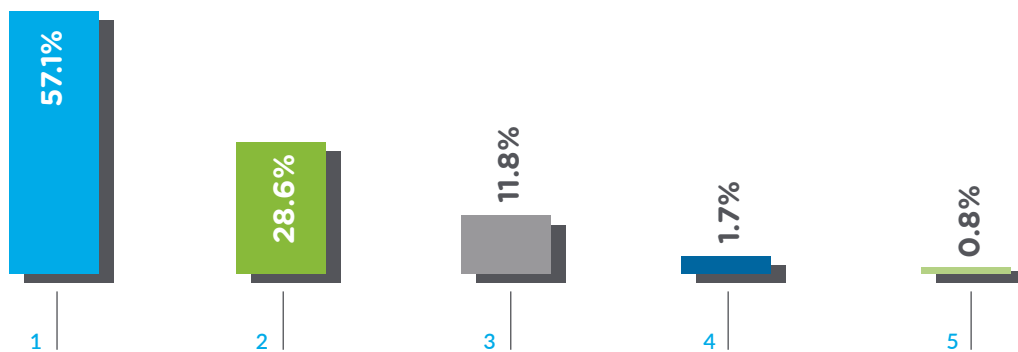
MOSTLY DESK/LAPTOP          EVENLY SPLIT          MOSTLY MOBILE

## Why do you think *so few* learners use **mobile devices** to complete your C&E training?

| | |
|---|---|
| MOBILE-COMPATIBLE TRAINING IS NOT A PRIORITY FOR OUR ORGANIZATION | **26.5%** |
| OTHER | **21.6%** |
| OUR EMPLOYEES DON'T USE MOBILE DEVICES IN THEIR JOBS | **19.6%** |
| OUR VENDOR(S) DON'T SUPPORT MOBILE | **18.6%** |
| MOBILE-COMPATIBLE TRAINING IS TOO EXPENSIVE | **6.9%** |
| DON'T KNOW | **27.5%** |

## First, do you capture and analyze data from your C&E training program?

| | |
|---|---|
| YES | **57.7%** |
| NO, BUT WE WANT TO | **40.7%** |
| DON'T KNOW | **0.8%** |
| NO, I DON'T SEE THE POINT | **0.8%** |
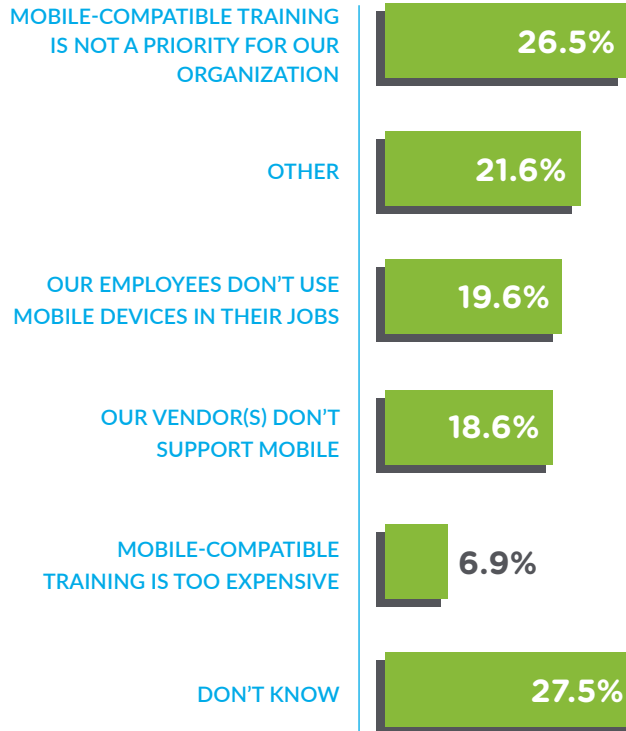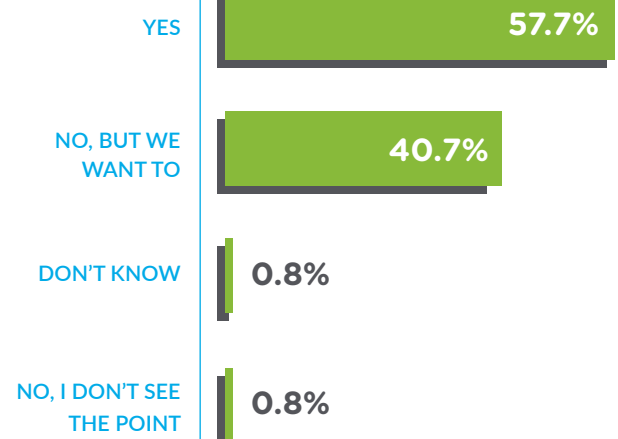
## In your opinion, **how useful** are the data analytics associated with your C&E program today?

3.4 AVERAGE RATING
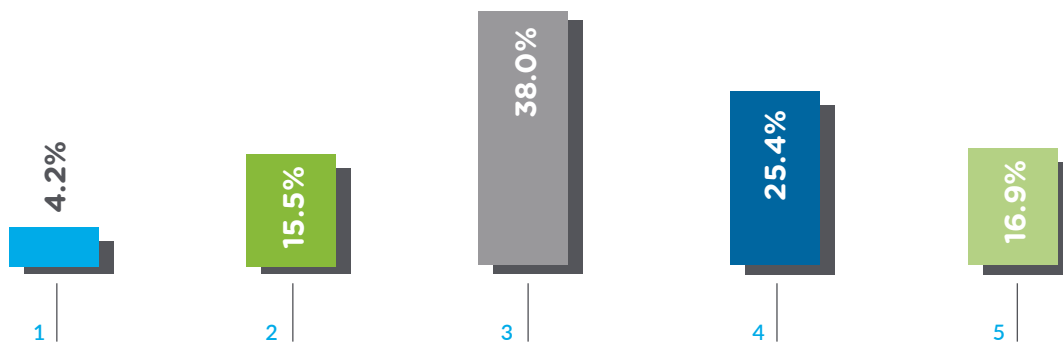
| 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|
| 4.2% | 15.5% | 38.0% | 25.4% | 16.9% |

| NOT USEFUL | SOMEWHAT USEFUL | VERY USEFUL |
|---|---|---|

What **specific value** do you get (or hope to get) from the data analytics associated with your C&E training program?

*"The C&E training data analytics help (or should help) me _____."*

IMPROVE OUR C&E TRAINING CONTENT, FREQUENCY, ENGAGEMENT, OR RELEVANCE **77.7%**

ASSESS THE EFFECTIVENESS OF OUR C&E TRAINING PROGRAM **75.2%**

EVALUATE OVERALL C&E CULTURE AND BEHAVIOR TRENDS **66.1%**

ASSESS THE EFFECTIVENESS OF OUR OVERALL C&E PROGRAM (I.E. BEYOND JUST TRAINING) **65.3%**

IDENTIFY POTENTIAL C&E-RELATED RISKS **62.8%**

CREATE AN INDIVIDUAL C&E RISK OR COMPETENCY PROFILE FOR EVERY LEARNER **27.3%**

FIND "BAD APPLES," SPECIFIC EMPLOYEES OR OTHER PARTIES WHO MAY POSE A C&E RISK TO THE COMPANY **22.3%**

OTHER **5.0%**

DON'T KNOW **0.0%**
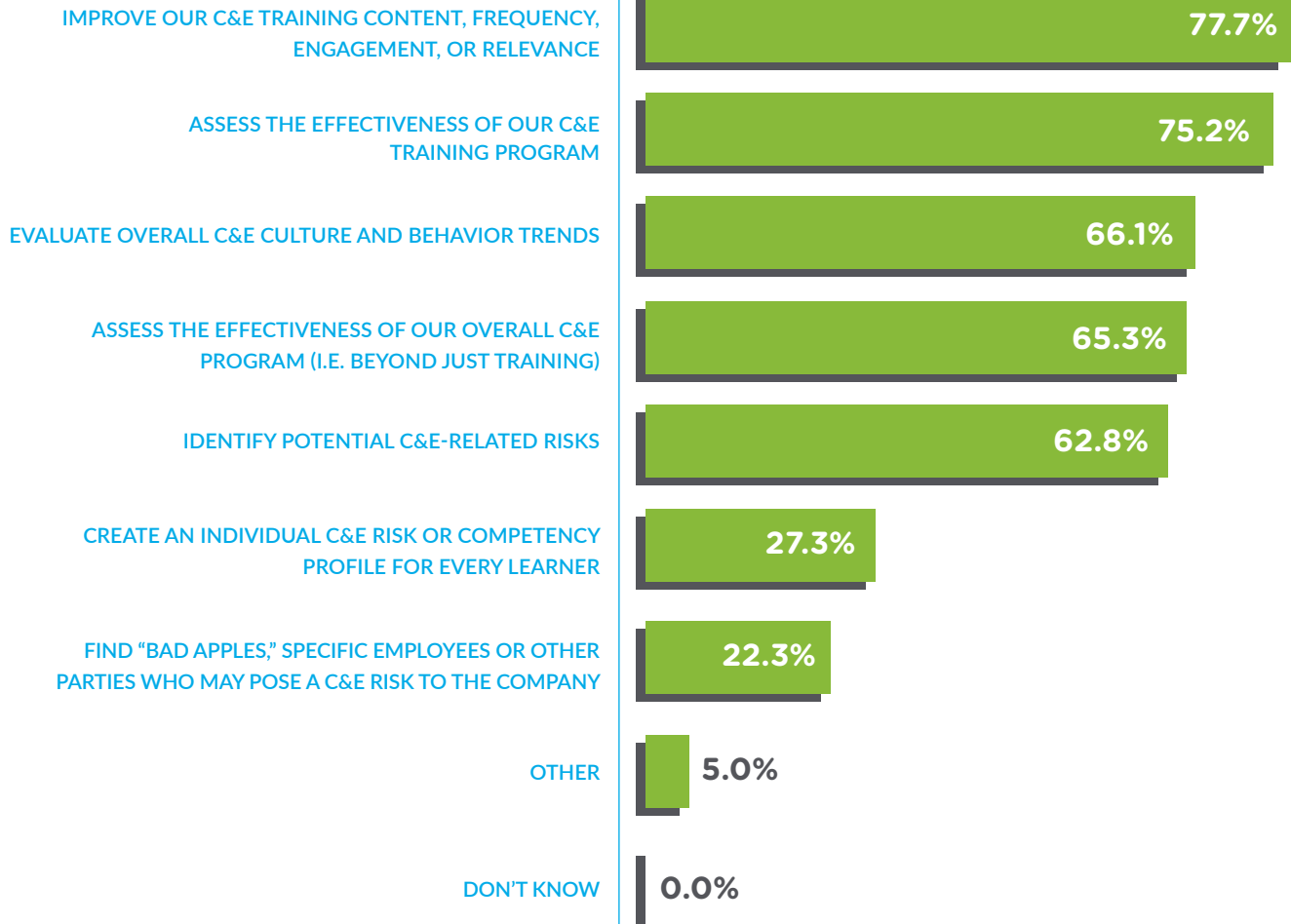
What **other uses** do you see for data and analytics that come from your C&E training program?

*"Assessment of culture"*

*"Determine the business impact of C&E training"*

*"Risk profiles, identify answers that people get wrong and where we may need to focus"*

*"Tracking completion of training by sector/office/etc."*

*"Percentage completing certification of our Code."*

## Which best describes the type of data analytics associated with your C&E training program?

QUANTITATIVE METRICS (SUCH AS COUNTS, DATES, AND AVERAGES) — **63.6%**

BOTH — **19.8%**

QUALITATIVE INFORMATION (SUCH AS INSIGHTS, REASONS, AND RECOMMENDATIONS) — **9.1%**

DON'T KNOW — **7.4%**
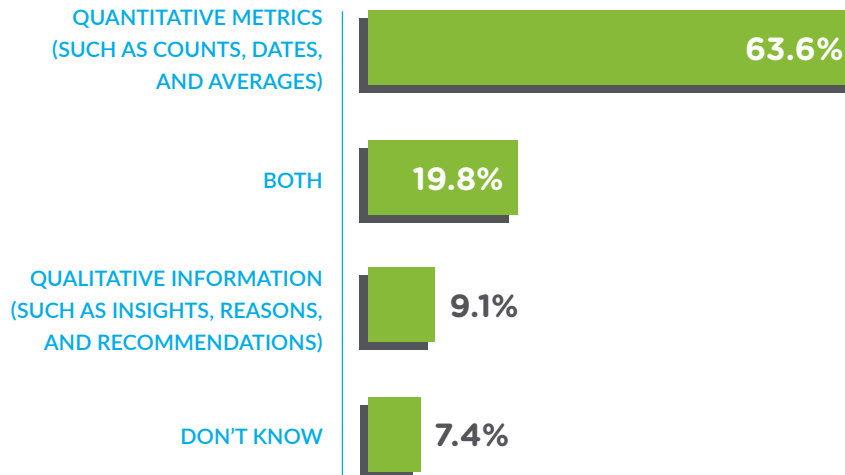
## In your opinion, are the data analytics from your C&E training program easy to use?

YES — **41.7%**

NO — **40.8%**

DON'T KNOW — **17.5%**
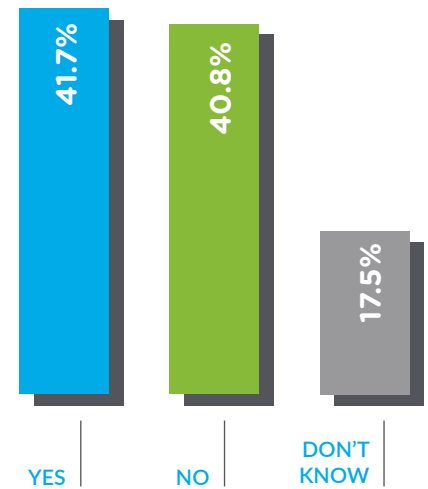
## How much data are you getting from your C&E training program?

2.0 AVERAGE RATING

1 — **38.0%**

2 — **28.1%**

3 — **28.9%**

4 — **4.1%**

5 — **0.8%**

NOT ENOUGH          A GOOD AMOUNT          TOO MUCH

**In your opinion, *why aren't* the data analytics associated with your C&E training program easy to use?**

| | |
|---|---|
| THERE IS NO DASHBOARD | 54.0% |
| WE DO NOT GET SUPPORT IN ANALYZING THE DATA, SPOTTING TRENDS, OR IDENTIFYING USEFUL INSIGHTS | 34.0% |
| IT'S TOO CHALLENGING TO DECIPHER WHAT THE DATA MEANS/IS TELLING US | 32.0% |
| IT'S TOO CHALLENGING TO SLICE AND DICE THE DATA | 32.0% |
| THE DATA ANALYTICS THAT ARE AVAILABLE ARE "OFF-THE-SHELF" AND NOT TAILORED TO OUR ORGANIZATION OR NEEDS | 30.0% |
| WE DID NOT GET ADVICE ON HOW TO SET UP THE DATA ANALYTICS TO CAPTURE INFORMATION THAT WOULD BE USEFUL FOR OUR PROGRAM AND GOALS | 20.0% |
| THE DASHBOARD IS CONFUSING OR HARD TO USE | 18.0% |
| DON'T KNOW | 6.0% |

## Which of the following would have improved your experience?

| | |
|---|---|
| DATA PRESENTED IN A CLEAR, READABLE FASHION | 69.4% |
| THE ABILITY TO CUSTOMIZE OR ADJUST THE DATA THAT'S COLLECTED FOR MY SPECIFIC PROGRAM AND GOALS | 69.4% |
| EXPERT CONSULTATION WHEN SETTING UP THE ANALYTICS, INCLUDING ADVICE ON HOW TO CAPTURE TRULY MEANINGFUL DATA | 49.0% |
| EXPERT CONSULTATION WHEN REVIEWING AND ANALYZING DATA, INCLUDING IDENTIFYING TRENDS AND INSIGHTS, AND PROGRAM RECOMMENDATIONS AS A RESULT OF THE DATA | 38.8% |
| LESS TIME SETTING UP AND TESTING THE TECHNOLOGY | 26.5% |

## Is there an annual plan for C&E **training** at your organization?

- YES — 88.8%
- NO — 9.6%
- DON'T KNOW — 1.6%
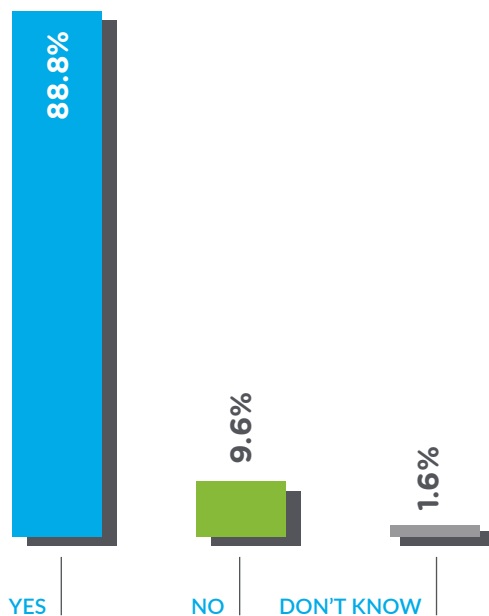
## How about for C&E related **communications**, is there an annual plan for those at your organization?

- YES — 74.2%
- NO — 21.8%
- DON'T KNOW — 4.0%
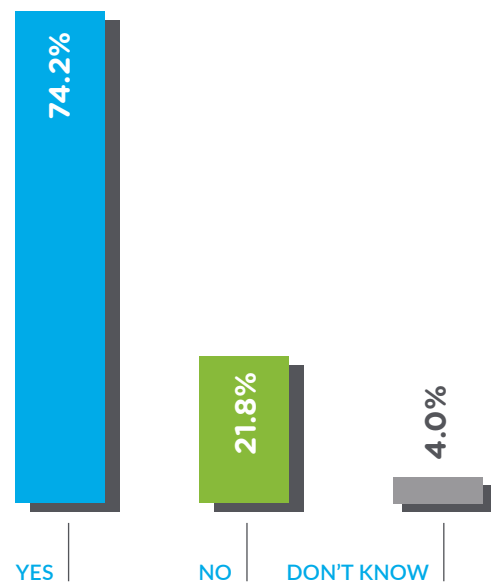
## Who develops your C&E training materials?

- WE TAKE A HYBRID APPROACH, USING BOTH VENDOR-DEVELOPED AND INTERNALLY-DEVELOPED MATERIALS — **39.5%**
- WE DEVELOP THEM INTERNALLY — **35.5%**
- WE PARTNER WITH MULTIPLE VENDORS — **13.7%**
- WE PARTNER WITH ONE VENDOR — **11.3%**
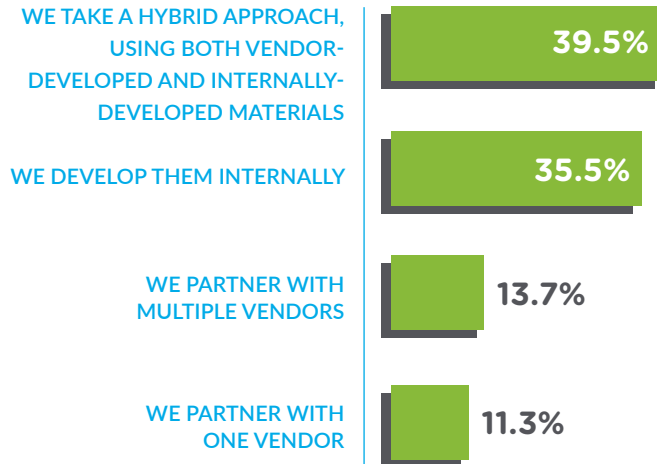
## Which best describes your vendor-developed training materials?

- BASED ON A LIBRARY PRODUCT, WITH MINIMAL CUSTOMIZATION — **50.6%**
- BASED ON A LIBRARY PRODUCT, BUT EXTENSIVELY CUSTOMIZED — **32.1%**
- BESPOKE/CUSTOM — **9.9%**
- OFF-THE-SHELF, WITH NO CUSTOMIZATION — **7.4%**
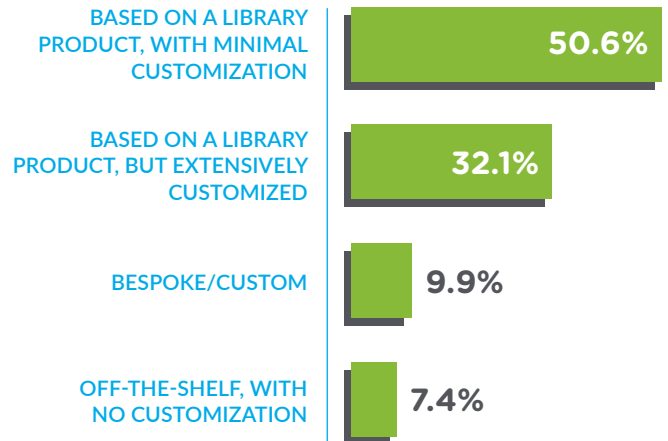
## How satisfied are you with your vendor experience?

### 3.3 AVERAGE RATING
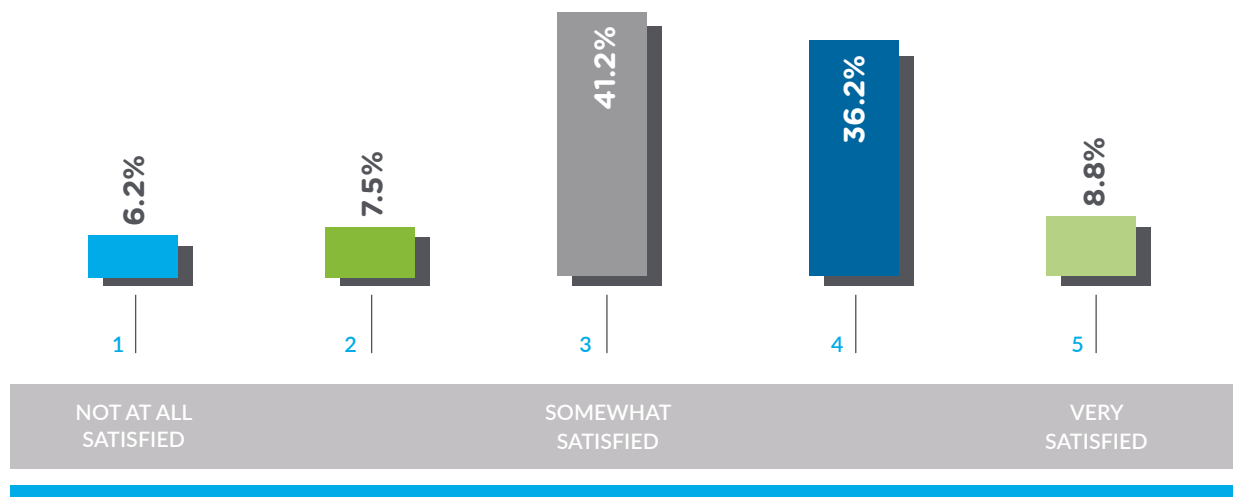
| 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|
| 6.2% | 7.5% | 41.2% | 36.2% | 8.8% |

| NOT AT ALL SATISFIED | SOMEWHAT SATISFIED | VERY SATISFIED |
|---|---|---|

## What obstacles do you face that *prevent or limit* your satisfaction with your vendor experience?

| Obstacle | Percentage |
|---|---|
| INFLEXIBLE CUSTOMIZATION OPTIONS | 50.0% |
| TOO EXPENSIVE | 47.7% |
| LACK OF COMPLIANCE AND ETHICS EXPERTISE | 27.3% |
| LONG TURN-AROUND TIMES | 22.7% |
| OTHER | 20.5% |
| TOO MUCH SELF-SERVICE IS EXPECTED | 18.2% |
| LIBRARY OF PRODUCTS IS TOO NARROW | 13.6% |
| NOT ENOUGH SELF-SERVICE IS OFFERED | 11.4% |
| DON'T KNOW | 9.1% |
| LACK OF CUSTOMER SUPPORT | 9.1% |
| LIBRARY OF PRODUCTS IS TOO VAST | 9.1% |
| NONE | 0.0% |
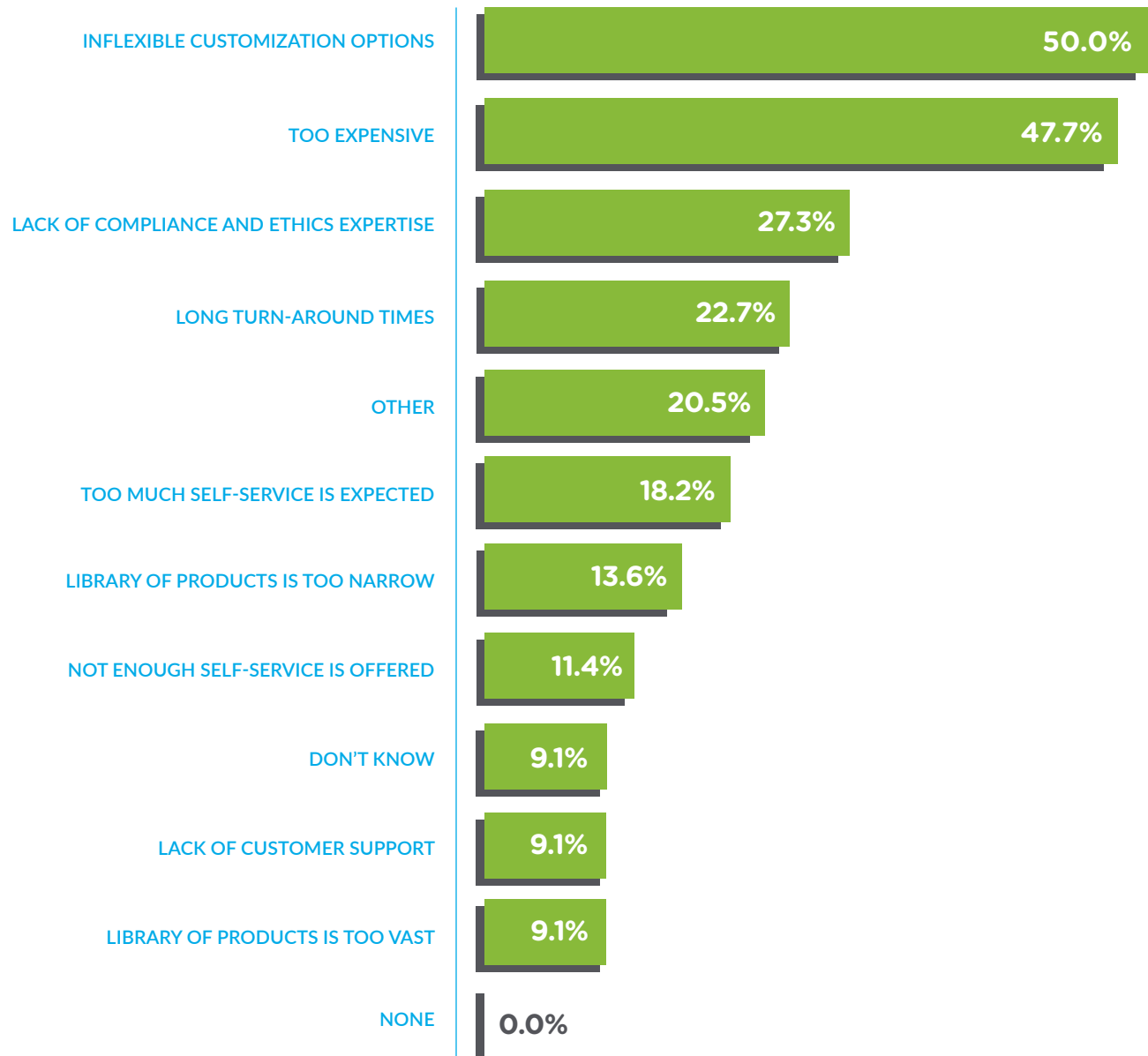
**What other obstacles do you face that prevent or limit your satisfaction with your vendor experience?**

*"Dated content and limited customization"*

*"One-time transaction. Have materials now and no follow-up."*

*"Generic courses lack maximum interest"*

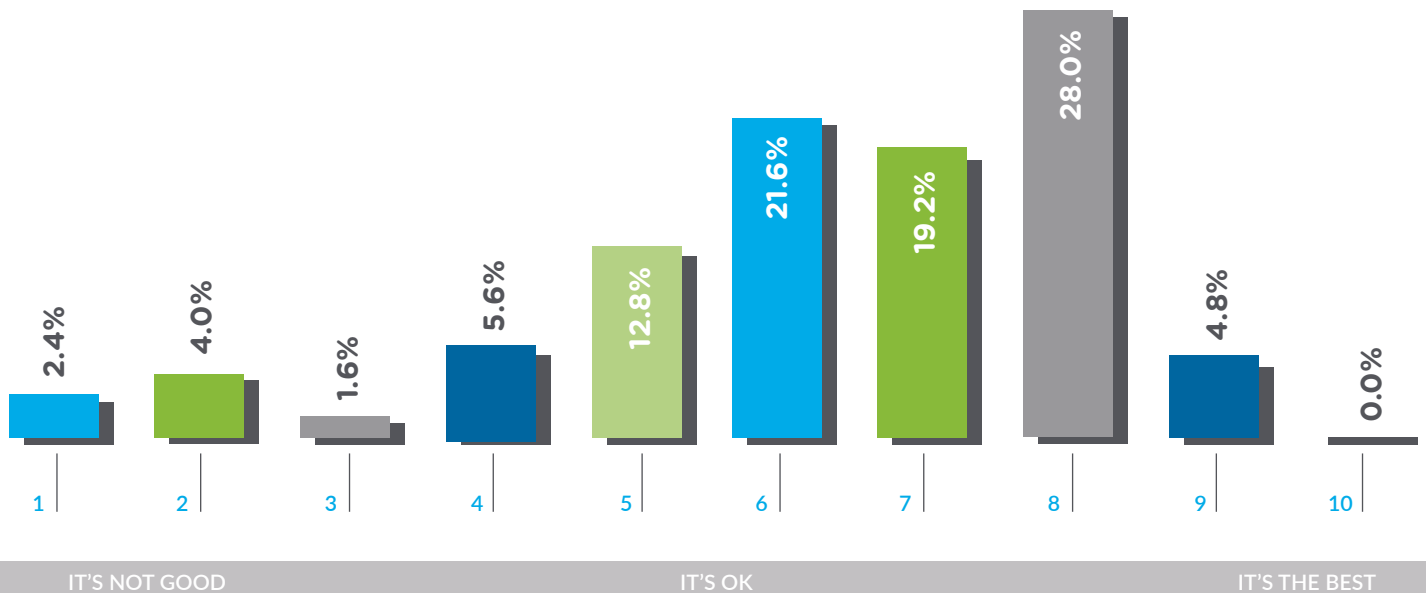*"Design of courses, content not exactly right fit for our employees"*

*"Lack of content related to recent world topics"*

*"Sometimes not exactly/the precise training we may be looking for"*

*"We use [a vendor] and their training reads like it is written by lawyers for lawyers and is not relevant to my organization"*

**Overall, how would you rate your C&E training?**

6.3 AVERAGE RATING

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| 2.4% | 4.0% | 1.6% | 5.6% | 12.8% | 21.6% | 19.2% | 28.0% | 4.8% | 0.0% |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |

IT'S NOT GOOD                IT'S OK                IT'S THE BEST

*You're almost done! But, before we get to our last question, is there anything else you'd like to share with us today?*

*"Great survey. Can't wait to see the results"*

*"Keep up the great work!"*

*"Always keeping an eye out for new training developments that allow some customization, but are highly relevant off-the-shelf."*

*"Great survey"*

*"Tone from the top is critical to the success in driving c&e in the company"*

*"There is a genuine lack of great compliance contnent being produced that can be used off the shelf. To be fair most of the good stuff I have seen is from Rethink. At the moment we have to be-spoke due to weak contnent from most providers."*

*"Translations is a struggle, IT issues on courses due to old browsers across the enterprise"*

*"We are out to RFP and have included Rethink Compliance to help us improve our program"*

*"Our board training is mostly a combo of live training and they also take the CBT training that our workforce gets. For Code of Conduct/Ethics training, we do more than you allowed as answers. We have annual recertification, but for people who are new, they take an Overview module within 30 days of hire and leaders get another course that focuses on their leader responsibilities within 60 days of hire. And then we also train our full leader population every 2-4 years."*

*"To provide additional context around analytics: we only track completions. It would be ideal to track performance so we could evaluate effectiveness and better identify risk areas."*

## How has the global pandemic affected your C&E training program?

IT HAS HAD NO EFFECT ON OUR C&E TRAINING — **53.7%**

THE TOPICS ON WHICH WE FOCUS HAS CHANGED — **22.0%**

WE ARE PROVIDING LESS C&E TRAINING — **15.4%**

OUR BUDGET FOR C&E TRAINING HAS DECREASED — **13.8%**

WE ARE PROVIDING MORE C&E TRAINING — **9.8%**

OUR BUDGET FOR C&E TRAINING HAS INCREASED — **1.6%**