IBM's Risk Revolution: Zero-Budget Global Training Program Cut Compliance Violations
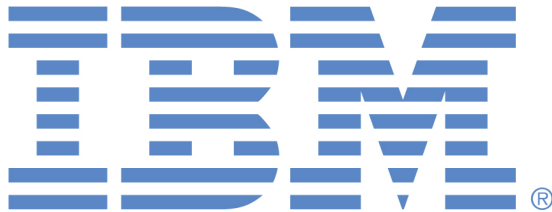
IBM, Transformation & Operations

Best Compliance Training

November 2024

Brandon Hall Group
HCM Excellence Award
LEARNING AND DEVELOPMENT
GOLD
2024

Company Background

Company-at-a-Glance	
Headquarters	Armonk, NY, USA
Year Founded	1911
Revenue	$62.0 billion (2023)
Employees	250,000
Global Scale (Regions that you operate in or provide services to)	Global, Operates in 175 countries
Customers/Output, etc. (Key customers and services offered)	• Software • Infrastructure • As a Service Solutions • Consulting
Industry	Business Services and Information Technology
Stock Symbol	IBM

Website	www.ibm.com

Budget and Timeframe

Budget and Timeframe	
Overall budget	N/A
Number of (HR, Learning, Talent) employees involved with the implementation?	0
Number of Operations or Subject Matter Expert employees involved with the implementation?	10
Number of contractors involved with implementation	N/A
Timeframe to implement	2 months prep work
Start date of the program	06-06-2022

Fit to the Needs

Overview

In today's rapidly evolving business landscape, characterized by globalization, rapid technological advancements, and the pervasive influence of AI and generative AI, the importance of compliance and risk management has never been more pronounced. With each innovation and market shift, new challenges emerge, demanding a proactive approach to education and training.

As a support organization responsible for the end-to-end quote-to-cash process, it's understood that compliance is not merely a checkbox exercise but a cornerstone of operational excellence and ethical conduct. Thriving in this environment requires fostering a culture of compliance from the ground up, where every employee understands their role in upholding regulatory standards and mitigating risk.

Achieving organizational alignment goes beyond implementing policies and procedures at a corporate level; it requires a comprehensive educational framework that instills a deep understanding of compliance principles in every job role.

In response to these challenges, the Risk Management (RM) team developed a tailored compliance training program for the quote-to-cash environment. This initiative aimed to equip the workforce with the knowledge, skills, and tools necessary to navigate global compliance complexities with confidence and integrity. The program goes beyond imparting foundational knowledge; it empowers employees to apply compliance principles in their daily responsibilities. By fostering a culture of compliance and ethical conduct, we aim to mitigate risks and safeguard our reputation by ensuring proper adherence to controls requirements.

Design and Deployment of the Program

At the heart of the compliance training program lies a commitment to tailored design and strategic deployment, driven by guiding principles that ensure effectiveness and efficiency, even with a limited budget or personnel.

With a limited budget available, the program embraces resourcefulness as a guiding principle, leveraging internal corporate development resources and enhancing them with the expertise of the risk management squad, supplemented by examples that illustrate lessons learned or showcase best practices. If the Risk Management (RM) team encounters topics beyond their expertise, they actively seek individuals within the company who possess the necessary skills and are willing to volunteer to contribute to the event. They also look to market trends and reference materials from reputable sources such as Harvard Business Review and PWC case studies.

Each year, the theme of Risk Awareness Week (RAW), which is the title of the compliance education program, is carefully aligned with the corporate and department strategy, reflecting the organization's priorities and focus areas. Additionally, organization members have the opportunity to vote on the key education sessions they would like to see included in RAW. This ensures that the training program is not only aligned with corporate objectives but also addresses the specific interests and needs of the audience.

Scheduled in the critical period at the end of the second quarter, this program aligns perfectly with the corporate strategy, allowing for a mid-year reflection on emerging compliance challenges and strategic insights. RAW offers a focused one-week of immersive training on compliance topics.

During RAW, the same interactive and live training sessions are offered in different time zones to accommodate the global team. This approach allows all employees to actively participate and engage in the sessions, regardless of their

geographical location. Additionally, for those unable to attend live sessions, recordings are made available for convenient access at a later time.

To further emphasize the importance of attending RAW, the RM team creates certificates for those who conclude all the sessions offered throughout the year. This serves as a tangible recognition of their commitment to continuous learning and professional development. Additionally, to promote engagement and fun within the organization, the RM team conducts raffles for internal non-monetary awards among all participants. This adds an element of excitement and camaraderie to the training experience, fostering a positive and collaborative environment.

A key feature of RAW is the inclusion of panel discussions centered on the main theme of the event. These discussions provide an opportunity for in-depth exploration of relevant topics and foster meaningful dialogue among key experts and leaders in the company.

More than just a training, Risk Awareness Week is a strategic endeavor to bolster risk awareness and facilitate meaningful compliance discussions across the company. This initiative not only demonstrates our dedication to continuous learning and improvement but also affirms our leadership in operational excellence and strategic compliance education.

Change Management Efforts

During the past two years of implementing RAW compliance training program, there were several challenges that demanded creative solutions.

The limited budget posed a significant initial challenge, hindering the ability to develop and deploy an effective training program. However, this obstacle was addressed by leveraging internal corporate development resources and expertise. By repurposing existing materials and tapping into internal talent, the RM team successfully designed and executed a comprehensive training program without additional financial resources.

Furthermore, they learned from the retrospectives about the importance of scheduling education sessions during the second quarter wisely. Aligning these sessions with periods devoid of holidays, vacations, or quarter-closing activities ensured optimal attendance and engagement during Risk Awareness Week (RAW).

Ensuring active participation from the global team, given diverse time zones and schedules, presented another obstacle. To overcome this challenge, the RM team implemented a strategy of conducting interactive and live training sessions during RAW across different time zones. Additionally, providing session recordings offered flexibility for employees unable to attend live sessions.

Motivating employees to enroll in compliance education proved to be a significant challenge. Compliance, often not considered a 'hot' topic, can be challenging to engage with, especially when participation isn't mandatory. To address this, communications were reinforced via blogs, slack channel emphasizing the importance of attending RAW sessions and the benefits of participation. Additionally, certificates were introduced for completing all sessions throughout the year and raffled internal non-monetary awards to encourage engagement and foster a positive environment.

Refinement Based on Feedback:

In the second year of the event, a survey based on feedback from the Net Promoter Score (NPS) surveys was introduced. This survey allowed all employees to vote on the topics they wanted to see covered. This change led to a more inclusive and tailored approach to topic selection, better aligning the program with our audience's interests and needs.

Moving into the third year of the event in 2024, the RM team continued to refine how topics are selected and presented based on participant feedback. This ongoing refinement process ensures the training program evolves to meet the changing needs and preferences of the global team.

Through innovative solutions and strategic initiatives, the challenges encountered during the implementation of the compliance training program were successfully navigated. By embracing resourcefulness, promoting engagement, and fostering a positive team environment, the commitment to continuous improvement and operational excellence has been reaffirmed.

Measurable Benefits

The compliance education initiatives implemented by the organization have yielded significant and measurable benefits, showcasing a tangible return on investment (ROI) and impactful outcomes. Through diligent tracking and assessment, key areas have been identified where the efforts have resulted in substantial improvements.

One of the most significant measurable benefits has been the reduction in compliance violations. Since the inception of the training program, a remarkable 30% year-over-year decrease in reported compliance violations has been observed. This decline underscores the enhanced understanding and clarity that the audience now possesses regarding regulatory requirements and areas of risk.

Moreover, the education efforts have extended beyond mere compliance, leading to improvements in process effectiveness. The number of assessments identified as ineffective during the internal audits has been reduced significantly, to a point there were none the last year. This indicates a heightened level of competency and proficiency among the workforce, resulting in more streamlined and efficient operations.

With the education provided, the organization has demonstrated an enhanced ability to safely drive the implementation of robots, automation, and AI initiatives. Leveraging the knowledge and skills acquired through our compliance training program, the organization has successfully documented and assessed over 500 automation and applications developed globally against the ITSS requirements. This proactive approach ensures that all automation and technological advancements are aligned with regulatory standards, mitigating risks, and promoting compliance throughout the organization's digital transformation journey.

In addition to these concrete outcomes, there were also observed positive trends in employee engagement and skills enhancement. The compliance education initiatives have led to a notable increase in the number of participants engaging with the training sessions, both live and through recorded sessions, showing a 22% year-over-year increase. Furthermore, the Net Promoter Score (NPS) has seen a commendable 7% increase, reflecting the overall satisfaction and effectiveness of the training programs.

These measurable benefits are a testament to the importance and impact of investing in compliance education. By prioritizing ongoing learning and development, the compliance posture has not only strengthened but also equipped our workforce with the knowledge and skills necessary to navigate regulatory complexities effectively. This commitment to continuous improvement has positioned our organization for sustained success in an ever-evolving business landscape.

Overall

Throughout the implementation of the compliance training program, the organization has gained valuable insights and lessons that have shaped the approach and outlook for the future. Here are the key findings and lessons learned:

1. Increased Awareness and Understanding: One of the most significant findings from the compliance training program is the marked increase in awareness and understanding among the workforce. Through targeted education initiatives, employees have gained a deeper understanding of regulatory requirements and compliance best practices, contributing to a stronger compliance culture within the organization.

2. Tangible Reduction in Compliance Violations: It was observed a tangible reduction in compliance violations since the inception of the training program. This decrease underscores the effectiveness of the educational efforts in equipping employees with the knowledge and skills necessary to identify and mitigate compliance risks proactively.

3. Enhanced Process Effectiveness: In addition to reducing compliance violations, the training program has also led to improvements in process effectiveness. Internal audits have revealed a significant decrease in the number of assessments identified as ineffective. This indicates a higher level of competency and proficiency among the workforce, resulting in more streamlined and efficient operations.

4. Positive Trends in Employee Engagement: The compliance education initiatives have resulted in positive trends in employee engagement and skills enhancement. There is a notable increase in the number of participants engaging with the training sessions, both live and through recorded sessions. Furthermore, the Net Promoter Score (NPS) has seen a commendable increase, reflecting the overall satisfaction and effectiveness of the training programs.

Lessons Learned:

1. The Importance of Resourcefulness: The limited budget initially posed a significant challenge to the development and deployment of the training program. However, the RM team learned the importance of resourcefulness and leveraging internal corporate development resources to overcome this obstacle successfully.

2. Strategic Timing and Scheduling: The RM team learned the importance of strategic timing and scheduling for the education sessions. Aligning sessions with periods free from holidays, vacations, or quarter-closing activities

maximized attendance and engagement, ensuring the success of the Risk Awareness Week (RAW) events.

3. Motivating Participation: Motivating team members to enroll in compliance education proved to be a significant challenge. It was proved that reinforcing communications and emphasizing the benefits of participation were effective strategies for encouraging engagement and fostering a positive environment.

Looking ahead, the team is excited about the future of the compliance training program and the opportunities for growth and enhancement it presents. The future outlook includes:

1. Continued Expansion and Enhancement: The RM team will continue to expand and enhance the compliance training program, with a focus on fostering broader participation from other departments and teams within the organization. By bringing together employees from diverse areas, collaboration and knowledge-sharing can facilitate an enriching learning experience for all participants.

2. Embracing Continuous Improvement: At the core of the future outlook is a commitment to continuous improvement. The training content will be regularly reviewed and updated to ensure that it remains relevant and effective in addressing emerging compliance challenges. Additionally, the RM team will seek feedback from participants and stakeholders to identify areas for improvement and refinement, allowing to deliver a training experience that meets the evolving needs of the organization.

3. Showcasing Success and Inspiring Others: The RM team is eager to showcase the success of the compliance training program and share the learnings with others within the organization. By highlighting the impact and value of the initiative, the RM team hope to inspire similar efforts in other departments and teams, collectively elevating the compliance efforts and driving positive change throughout the organization.

In summary, the key findings and lessons learned have provided valuable insights that will inform the future approach to compliance education. By continuing to expand and enhance the training program, embracing continuous improvement, and inspiring others within the organization, the RM team will strengthen the commitment to excellence and leadership in compliance education.

Risk Awareness Week Metrics and educations offered:

RAW	Theme	Enrolments	Topics	Speakers	NPS	Certifica-tions	Education Hours
2023	Risk Navigator's Handbook Series	3180	1. Controls Requirement When Transforming 2. Gatekeepers – Integrity, Ethics and Compliance 3. Engagement Strategies 4. CIO Governance, Risk & Compliance 5. Audit Lessons Learned 6. Types of Risks	27	90	110	10
2022	Risk Management Advances on Its Foundations and Practice	2612	1. SOD Management 2. Integrity Awareness 3. Audit Readiness 4. Improving your cybersecurity hygiene 5. Internal Controls 6. Risk Management	26	84	70	10

2023 Course descriptions:

- #### Controls requirement when transforming

Implementing new tools? Automating existing processes? Streamlining procedures? All these can expose your organization to control, compliance, and risk factors. This course is a must-attend for anyone looking to conduct control assessments for transformation initiatives. We'll share a transformation checklist and show you how to understand potential control implications and the needed risk assessments to mitigate them.

- #### Gatekeepers - Focus on Integrity, ethics and compliance in a changing world

As IBMers, we all face pressure in the form of deadlines, we are asked to do more with less, and streamline our processes while maintaining our focus, drive transformation, and achieve our business goals. These factors are part of any high-performing work environment. Regardless of the pressure, we must always do the right thing to minimize risk and ensure we perform our day-to-day activities in accordance with IBM's focus on integrity.

Engagement strategies - Panel Discussion

What is the difference between an audit, a review, and an investigation? There are different types of engagements that organizations can conduct. Would you like to know more about their strategies, purposes, and scopes? Join this live panel discussion and hear from our guest speakers.

CIO Governance, Risk, and Compliance (GRC) Approach

The CIO GRC team will cover a brief overview of CIO BISO & Cybersecurity Assurance organization and mission, review some essential GRC requirements and responsibilities, provide lessons learned from audit and self-assessment reviews, and highlight the importance of risk assessments and threat modeling for implementation and review of Security and Privacy by Design (SPbD) principles.

Audit Lessons learned

Are you interested in learning from audit lessons and avoiding recurring findings? We will share the latest key findings and recommendations from the 2022 direct audits. We'll provide examples and testimonials to help you better understand how to be fully prepared for your next audit. And, to top it off, we'll provide you with an audit readiness checklist!

Types of Risks

There are many different areas of risk that businesses may face. We'll explain different types of risks and show you how to use the risk management framework to identify, evaluate, and address them in a consistent and systematic way. We'll share a risk management assessment template and provide you with guidance on how to properly document risks.

2022 Course descriptions:

- **SOD Management**

You have probably heard about Separation of Duties (SOD) many times. But did you know: Why we have so much controls around it? How to properly perform a SOD assessment? How to deal with conflicts? Which are the pain points detected in recent audits? In this session you receive an answer to all these questions and more. There are also guest speakers sharing their own experiences and tips.

- **Integrity Awareness**

Session delivered in partnership with Global TCO team to raise awareness of ethics and integrity issues facing gatekeepers, what kind of behavior to watch for and avoid. You will learn why operating in an ethical manner with a focus on

integrity is important to individuals, teams and to IBM. We also inform who to contact to report any issues.

- ***Audit Readiness***

The Audit Readiness session is focusing on 'Back to Basics'. We mostly cover the Audit Process, the Success-factors and Do's & Don't during an audit. The speakers share several real life examples. We encourage you to learn about Audit Readiness with us.

- ***Improving your cybersecurity hygiene***

In this session we cover basic cybersecurity hygiene best practices and discuss ways to better defend yourself and IBM against cybersecurity threats. Listen to the advice and learn from the experts from the CIO Security team.

- ***Internal Controls***

A strong internal control system is one of the best mitigation strategies for managing operational and financial risks. This course aims to provide you with a basic understanding of the role of internal control in the organization. We provide you with the essential knowledge that every professional needs to have by sharing examples and experiences from Business Controls experts.

- ***Risk Management***

Do you want to know what Risk Management is all about? In this session you will learn how Risk Management is an integral part of your professional life and go through real life examples with our guest speakers of how to manage risk, while keeping the business going.

APPENDIX

Picture 1: Blog with logo for 2024 Risk Awareness Week

March 20, 2024

Team,

As we enter the second quarter, our signature event is just around the corner. The team is diligently preparing the sessions and materials we'll cover. I'm excited to offer a sneak peek and extend an invitation for you to participate.

Risk Awareness
Week | 2024

This year, our theme aligns with the Corporate Compliance priority for 2024:

"Eyes on and Hands Off." We will explore control aspects and considerations in executing our strategy, which includes unleashing extreme productivity through digital infusion, radically simplifying processes, and achieving unified global execution.

To ensure our discussions are tailored to your interests, we'd like to hear your thoughts on what topics you'd like us to cover. We have curated a list of educational topics from which we invite you to vote for the top 4 you would like to see featured

Select from the list below the 4 topics you would like to see featured in this year's RAW: *

☐ Record Retention: As we deploy new tools, there's a risk of data loss, especially if proper backup and mitigation plans are not in place. Do you know what risks we might encounter? In this session, participants will learn how to effectively manage data through the creation of a clear record retention policy, ensuring compliance with standards.

☐ Automations, Robots & Spreadsheets: The use of robots and Excel VBA can help us automate manual steps, but what are the new risks and compliance requirements we need to fulfill? This session will teach attendees about the potential risks and provide tools and guidance available to help automate their processes in a controlled manner.

☐ Process Simplification: Any transformation needs to be clearly assessed against potential risk areas. Do you know what are the areas you should be concerned about and assess? In this session, you can understand more about the risk areas and how to assess, document, and mitigate your risks.

☐ Data Privacy: Do you know what the data privacy requirements we need to comply with are? Do you know the reason for each one of them? In this session, you will learn how to avoid data breaches and privacy violations through strong security protocols and privacy compliance.

☐ Resilience: As we continue to work as a global team and centralize our operations in centers of excellence, the importance of having a recovery plan and offload location is even more important. In this session, we will help you to understand the company's business continuity strategy and how you can help to increase our resilience.

☐ AI and Machine Learning: Do you know what new risks AI and machine learning bring and how we can mitigate them? During the session, we will be discussing the development of ethical guidelines, the importance of human oversight in AI systems, and addressing potential biases and ethical concerns.

Add here any suggestion that is not covered in the topics above:

SUBMIT

Picture 2: Blog from 2023 Risk Awareness Week with the logo and most voted topics:

April 17, 2023

We're thrilled to announce the theme for this year's event: **Risk Navigator's Handbook Series: A useful guide on how to Eliminate, Simplify, and Automate in a risk savvy way**. And that's not all! We're excited to share the four fantastic education modules based on your votes.

The top-rated module, '**Control Requirements when Transforming,**' is a must-attend for anyone looking to conduct control assessments for transformation initiatives. We'll share a transformation checklist and show you how to understand potential control implications and risks.

The second top-rated module is **'Audit Lessons Learned,'** in this session we will share the latest key findings and recommendations from our 2022 audits. We'll provide examples and testimonials to help you better understand how to be fully prepared for your next audit. And, to top it off, we'll provide you with an audit readiness checklist!

The third module is all about the **Types of Risks**, where we'll explain different types of risks and show you how to use the risk management framework to identify, evaluate, and address them in a consistent and systematic way. We'll share a risk management assessment template and provide you with step-by-step guidance on how to properly document risks.

We're also excited to announce that our Trust & Compliance and CIO teams will be covering sessions on **integrity and cybersecurity education**.

Last but not least, we're bringing together some of the brightest BC professionals for a panel discussion on **different types of reviews and engagement strategies**. You won't want to miss it!

The Risk Awareness Week is scheduled for June 1 until June 7. As we get closer to the date we will share the links for enrollment. Stay tuned!

Picture 3: Example of a Slack message to promote the event (RAW 2023):
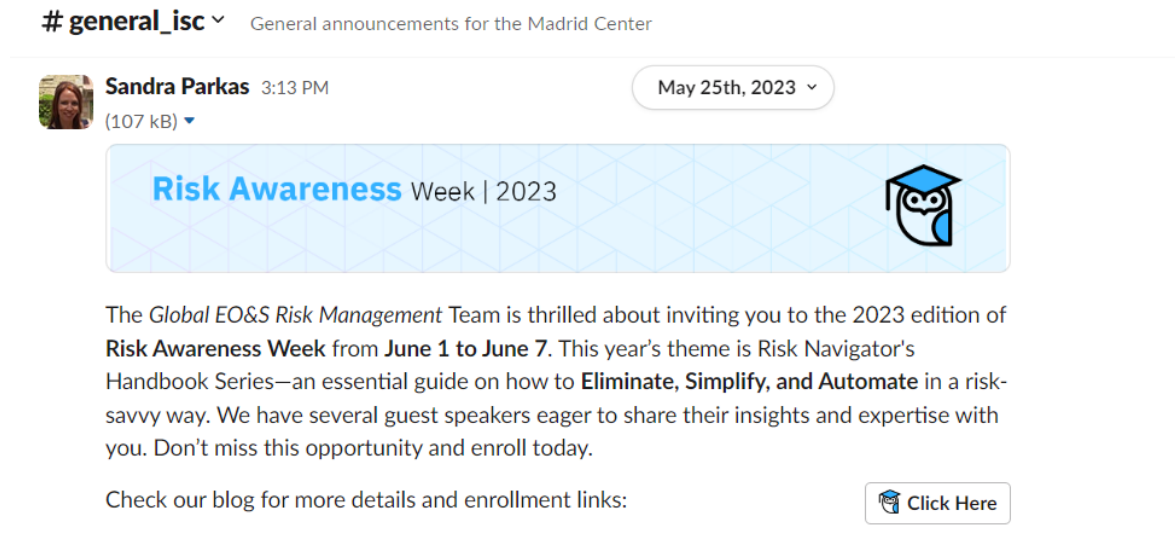
Picture 4: Box Folder with all Recordings and Education Material from RAW 2023

Picture 5: Box Folder with all Recordings and Education Material from RAW 2022

⇱ > Risk Awareness Week 2022 > **Final Packages and Recording RAW 2022**

NAME		UPDATED ↓	SIZE
📁 Internal Controls	🔗	Jun 14, 2022 by SANDRA PARKAS	3 Files
📁 Risk Management	🔗	Jun 10, 2022 by SANDRA PARKAS	5 Files
📁 SOD Management	🔗	Jun 9, 2022 by SANDRA PARKAS	4 Files
📁 Cybersecurity	🔗	Jun 9, 2022 by SANDRA PARKAS	3 Files
📁 Integrity	🔗	Jun 8, 2022 by Martina Hatalova	3 Files
📁 Audit Readiness	🔗	Jun 8, 2022 by Martina Hatalova	3 Files

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