Compliance Communications & Training: The Critical Factor for Success

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1. Written policies and procedures
2. Designated compliance officer and compliance committee
3. Effective **training** and **education**
4. Effective lines of **communication**
5. Internal monitoring and auditing
6. Enforcement of standards through well-publicized disciplinary guidelines
7. Prompt response to detected problems through corrective actions
Key Elements of a Compliance Program

Define WHO does WHAT, WHEN and HOW

Train employees on their roles in ensuring compliance

Monitor and assess compliance with policy and procedures

Continuously improve procedures to address any compliance problems found

Policies & Procedures
Communications & Training Programs
Control Mechanisms
September 15, 2009

To all recipients of the Guidelines Manual:

(4) (A) The organization shall take reasonable steps to communicate periodically and in a practical manner its standards and procedures, and other aspects of the compliance and ethics program, to the individuals referred to in subdivision (B) by conducting effective training programs and otherwise disseminating information appropriate to such individuals’ respective roles and responsibilities.
Guiding Principles (*)

- Consistent with risk assessment and aligned with Code of Conduct
- Tailored for different groups of employees
- Active involvement of Senior Management
- Promote understanding of rules, policies and laws
- Continuously reviewed to keep them current and relevant

(*) This and some of the following concepts are based on ECOA Foundation recommendations in “The Ethics & Compliance Handbook – A practical Guide from Leading Organizations”
• Structure and contents of the CCTP must be created and implemented around the company’s risk assessment

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<th>Design</th>
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<td>Employee demographics</td>
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• Customize to

• Continually revise and update to reflect changes in risk
It is a cross-disciplinary function that requires input from various groups, but a single person or team responsible for:

- Design
- Development
- Delivery
- Evaluation
- Revision

Three main players:

Compliance Office
Human Resources
Training Department
Goals and key messages

• Communication (information about ethical standards, laws & policies) vs. Training (develop employee’s skills to apply those principles)
• Limit volume of information
• Simple and clear messages
• Repeat multiple times
Target Audiences

• Consider the needs, interests and relevant risks of different populations:

  Area  Level (*)  Tenure

• It is counterproductive to provide training on topics that do not relate to them

• Differentiate “prevention vs. treatment” (organizations that have experienced ethical/compliance lapses)

(*) The Fed. Sentencing Guidelines identify five different types of training audiences: Governing authority, High level personnel, Substantial authority, Employees and Agents
• Ideal delivery method depends on message/contents, audience size and demographics, geographic scope, and technical sophistication.

• In-house or outsourced

• Intranet / webinars / e-mail / classroom

• Components (CEO-CECO message, scenarios or movie clips, quizzes)

• Follow up on high level messages (Posters, wallet cards, newsletters)
• Develop a matrix with target audience for each course, topics, “mandatory” status and timetable for completion

• Consider other communications/conferences/events taking place in other areas (stage or combine)

• Consider if “testing” is required

• Monitor employee completion
Pilot Test

- How it will work in the “real world”
- Relevant topics are covered thoroughly
- No technical glitches
- No “lost in translation” (cultural differences)
Make it fun, relevant and memorable!