Online Compliance Training

Colleagues, Agents, Operators and their Assistants

Overview

Post Office Ltd operates in an ever changing environment in relation to the compliance that must be delivered and adhered to for a wide range of products and services that we transact within our branch network. As such, it is vital that Post Office Ltd provides the necessary training, support, advice and assurance to the people working in all branches to ensure they are fully equipped to operate compliantly. The result is customers are provided with the best possible service, our reputational branch is protected and the regulatory risks are minimised.

In this ever-changing regulatory environment, Post Office Ltd must ensure it identifies, manages and controls any existing and future regulatory risks.

Post Office Ltd's current approach for administering Compliance Training, a combination of workbooks supported by a test on Horizon for branch colleagues, a manual class room process for new joiners and the HR system known as 'Orbit' for all other colleagues, is a reactive and inflexible process that requires refreshing to ensure the business continues to effectively and efficiently delivers on its obligations. It is an approach that confirms adherence to a process rather than one which supports engagement and true understanding and deployment of the training.

Our current process for testing knowledge and understanding of compliance is fragmented and does not meet the changing needs of the network models. It is also the process that is being favoured by Product Teams to demonstrate to Clients such as DVLA compliance to training and procedures and there is a risk that the approach will overload the branch network.

The aim of this paper is to propose a proactive rather than a monitoring approach to regulation, via a digital multi-channel solution, which is becoming a full-time strategic business activity for many organisations.

Background

Everybody who works in a branch is required to understand each compliance module and complete the associated test before they start serving customers.

Post Office Ltd's compliance training modules cover a number of different regulatory areas and help branch colleagues understand what they need to do to ensure that the business operates in a compliant way. This helps to ensure our customers know that they can trust the Post Office brand.

There are 3 main approaches to deliver Compliance Training –

* **New Joiners**

New joiners to crown branches and new agents and operators attend classroom induction training sessions and will complete the tests while they are in the classroom. Compliance workbooks are read and a manual test is completed and marked by the Field Support Advisors running the training. The joiner must then complete the test on Horizon once assigned a branch to obtain a receipt of completion for each of the compliance modules.

For agency branches, including those operated by multiple partners such as McColls, it is the responsibility of the agent or operator to recruit their own members of staff and   ensuring that they read the workbooks, complete the tests on Horizon and obtain a receipt of completion for each of the compliance modules before they start work. For

some of the Network Transformation branches, a proportion of the assistants will be offered places on the classroom induction training sessions.

* **Existing Branch Colleagues**

Historically, Post Office has had an obligation to demonstrate to the different regulators that all branches have been trained regarding how to operate compliantly. This has led to the approach of deploying an annual training plan which requires all existing branch colleagues to read the relevant compliance workbooks, complete the tests on Horizon and obtain a receipt of completion for each of the compliance modules, in order to transact the appropriate products and services.

The modules are refreshed on an annual basis and are issued to the branch network at intervals during the year. Each module is accompanied by a 10 question Horizon test, which must be completed within a three week period. A printout from the Horizon system is then produced which identifies the user ID of the person who has completed the test and this also indicates they have passed the test.

The colleague in the branch must select what role they play in the branch – Agent, Operator, Branch Manager, Officer in Charge or Clerk.

* **Head Office & Central Support Teams**

As directed by Post Office Ltd, usually to support Christmas pressure or industrial action, head office and central support teams access the HR 'Orbit' system to read the online compliance modules and take the associated tests, which must be completed prior to working on the branch counter.

The modules are refreshed on an annual basis and are implemented onto the HR 'Orbit' system network at intervals during the year. Each module is accompanied by a 10 question test, which must be completed prior to working on the branch counter.

In addition, there are some compliance modules which are unrelated to branches, which all central support and head office teams must complete annually, e.g. Data Protection/Information Security. These are available on the HR Orbit system. New joiners are asked to complete this as part of their induction and this is monitored by HR.

Existing Compliance Management

Historically, it has been the role of the Compliance Team, Branch Standards and the Network Engagement Team to determine the annual compliance training plan. The Compliance Team provide the guidance on what training needs to take place to satisfy the regulators. As a group, they decide on the timing of the different modules that best suit the needs of the regulator and the branches and sign off the content of the training. For example, mail compliance training is typically deployed in October to ensure that branches are re-trained at the point proceeding the busiest time of the year for mails transactions.

The Branch Standards Team is responsible for ensuring that all branches complete the training within the required period. They are not responsible for ensuring that Head Office and Central Support Teams complete the training.

If a different team want to add to the compliance training plan then the request will be raised via the normal business change process (Gating).

Existing Compliance Auditing

The Field Support Team are responsible for ensuring that new colleagues, agent, operators and any assistants attending the classroom complete the relevant compliance training. They provide workbooks to the new entrants mark the tests and input the results to a sharepoint site.

The Branch Standards Team is responsible for ensuring all branches complete the required on-going training to the required timescale. However, the monitoring approach varies depending on the type of branch.

- Crown branches. Branch managers are requested to complete a sharepoint site to indicate how many members of staff are working in the branch. A daily Horizon test file is polled by the Compliance Team and sent to the Branch Standards Data Team and this information is then used to check the number of different users which have completed the training. A branch isn't classed as fully compliant until the expected number of users have completed and passed the training. Regular reports are sent to the Crown management team to inform them who has completed the training and they also assist in ensuring the branches complete it on time.

- WHSmith branches. These branches are treated very similarly to Crown branches. Staffing information is provided to the Branch Standards Team by the WHSmith relationship team and the Branch Standards Team track completion against the number of staff that are expected to complete the training.

- Agency branches. As above, the data of test information is polled daily and sent to the Branch Standards Data Team for analysis. Whilst the report indicates the different users in the branch who have completed the training, because the data regarding the assistants who work in our branches is not 100% accurate and due to the fact that the agent or operator is contractually responsible for ensuring all staff have been trained, the branch is classed as compliant if there is a user ID who completes the training at the agent/operator/officer in charge level. Reminders to complete the training are sent to branches throughout the training window. The Branch Standards Team also make pro-active calls to branches who have yet to complete the training before the deadline. They also manage the process for agency branches where they have failed to complete the training on time and initiate the relevant corrective action. If an agency branch fails to complete the training on time then this could result in a visit by a Field Support Advisor and the agent will be charged up to £100 to cover the costs.

    An example follow up process has been embedded.

    Reg Comp
    FU-Shaded.vsd

Completion of the relevant compliance training modules also forms part of the branch Compliance audit. The Field Support Team identify which modules should have been completed, identify the members of staff working in the branch and check that an Horizon receipt is available for all members of staff to ensure that it has been completed. In 2012/13, the Field Support Advisors carried out approximately 2800 compliance audits across the branch network.

Whilst Head Office and Central Support Teams are required to undertake the training via the HR Orbit system, there is no co-ordinated central monitoring that takes place for completion.

The Civil Aviation Authority also has the legal right to audit any of our branch network to ensure that any colleague handling mail in branch has completed the Dangerous Goods training. They also have the right to request training record information at any time.

Risks & Issue with Current Process

* Three separate methods for completing and managing the training results in lack of join up between the teams, lack of clarity of ownership and three sets of training data and information being held in different places. This leads to inefficient use of resource, makes it difficult for Post Office to understand the true picture of compliance which in turn puts Post Office at risk if audited by the likes of the Civil Aviation Authority.

* The lack of an alternative on-line channel to complete the training wastes time and resource in the induction training for new entrants and also makes it operationally difficult for branches to complete on Horizon, especially in the new Local model. All assistants within the Local model are required to undertake certain compliance training modules. In some instances this could be 25 people who need to access one piece of Horizon equipment. Customers cannot be served whilst the training is being completed, which can also encourage the behaviour of doing the test to get it over with, rather than to really understand the content of the training. This doesn't create an ideal training environment if colleagues are not given adequate opportunity to digest the training.

* The lack of an on-line channel also makes it difficult for temporary agents and operators or holiday reliefs to access training information and keep records. They are often unaware of which modules need to be completed. The conscientious ones will undertake the training in all branches but there is also the risk that a large number will be working in branches without having the correct awareness.

* The Horizon method of training restricts the type of questions that can be asked due to the fact that the fields are limited and questions one and ten have to either be a "yes/no" or "true/false" answer. This often leads to simple questions being asked which does not really test true understanding or deployment. Feedback from branches indicates that they can often complete the test without having read the training book and therefore compliance training is often seen as a tick-box, non-value add requirement and something that they don't engage with.

* The Horizon method also restricts what and when compliance training is delivered. The timescales needed for change mean that quick, random tests of knowledge within the network cannot be undertaken.

* The Horizon method also means that every type of branch has to go through the same training. There is no flexibility to train and test understanding depending on the size, customer traffic or risk profile of the branch. It also doesn't facilitate more frequent, varied testing of branches where there is a known risk.

* The current management process of the training is resource-hungry and in-efficient.

* The lack of quality data regarding who is working in our branches makes it difficult to manage the process.

* The content of the training does not vary that much on an annual basis yet the work-books are still printed and sent to each branch. The workbooks are often very large in size, often being more than 20 pages. This also exacerbates the situation that colleagues don't actually read the training before doing the test. Confirmation for agents, operators, branch managers and Officers in Charge that everyone has completed the training involves manually checking receipts in branch.

Costs to Administer Current Process

Costs shown in the table below have been provided by Georgina Blair, based on 2013/14 requirements.

* **Additional Cost Areas (need to understand these costs / effort if available)**

Lee Heil's team incur postage and time in packaging up the workbooks, and the training team incur cost in marking them and sending in the results. Operators' and agents' assistants do the test in branch on Horizon, and in a newly opening branch that takes up a lot of the trainer's time.

There are also the management costs per module. The Branch Standards Team can make approximately 1000 phone calls per training module. Management time is also needed to feed into the training content, process the management information, up-load the call information, analyse the data and then initiate any corrective action process.

Date of Invoice	Company	Description	Who does spend benefit	Amount (ex vat)
April 2013	Crystal	Keeping online DP module open until May 17	New joiners	303
April 2013	Comms (internal)	Branch Focus articles (2) re Data Protection module	Branches	1482
June 2013	Linney	Dangerous Goods 2 (Domestic) - workbook v.1 & v.2	Branches	6224
June 2013	Linney	Dangerous Goods 2 (Domestic) - online quiz	Central functions	1865
June 2013	Skills group (internal)	Two days of test analyst time to test Horizon DG2 test	Branches	1000
July 2013	Linney	Reprints - DG1 workbook - 1000 v2 for new joiners	New joiners	1453
July 2013	Linney	Reprints - Telephony workbook - 1000 v2 for new joiners	New joiners	956
July 2013	Comms (internal)	Branch Focus insert to update Financial Services workbook	Branches	1482
August 2013	Linney	AML & Info Security - workbook v.1 & v.2	Branches	8760
August 2013	Skills group (internal)	Two days of test analyst time to test Horizon AML/InfoSec test	Horizon	1000
August 2013	Linney	AML & InfoSec - online module & quiz	Central functions	4714
October 2013	Linney	Reprints - FS workbook - 1000 v.2 for new joiners	New joiners	946
October 2013	Linney	Reprints - DP workbook - 1000 v.2 for new joiners	New joiners	1543
October 2013	Linney	Reprints - DG2 (Domestic) workbook - 1000 v.2 for new joiners	New joiners	1894
October 2013	Linney	Reprints - DG1 (International) workbook - 1000 v.2 for new joiners	New joiners	1543
November 2013	Linney	Mails workbook - v.1 & v.2	New joiners	4025
November	Linney	Mails - online module and quiz	Online	4090

2013				
November 2013	Skills group (internal)	Two days of test analyst time to test Horizon Mails test	Branches	1000
December 2013	Linney	Reprints - Homephone & Broadband - 1000 v.2 for new joiners	New joiners	1200
January 2013	Linney	Locals Foundation Module - 1000 for new joiners	New joiners	3000
January 2013	Linney	Financial Services workbook - v.1 & v.2	Branches	6250
January 2013	Linney	Financial Services - online quiz & test	Central functions	4500
February 2013	Linney	Homephone & Broadband workbook - v.1 & v.2	Branches	6250
February 2013	Linney	Homephone & Broadband workbook - online quiz & test	Central functions	4500
February 2013	Skills group (internal)	Two days of test analyst time to test Horizon Homephone & BB test	Branches	1000
March 2013	Linney	Data Protection workbook - v.1 & v.2	Branches	6250
March 2013	Linney	Data Protection workbook - online quiz & test	Central functions	4500
March 2013	Skills group (internal)	Two days of test analyst time to test Horizon Data Protection test	Horizon	1000
March 2013	Comms (internal)	Branch Focus articles - estimate	Comms	10000
		Total		92729

Stakeholders to be consulted

I have assumed that Gayle Peacock will be the Business Sponsor for this opportunity.

The stakeholders shown below have been identified as key to the development and successful launch of this activity.

- Gayle Peacock, Anne Allaker and Angela Van-Den Bogerd – Business Improvement Programme
- Julie Thomas Allen Kambasha, Angela Bunyan – Network Stakeholder Engagement. Julie is also the work stream owner for training on the Business Improvement Programme
- Branch User Forum – this forum is chaired by Angela Van-Den Bogerd and the SLT members include Paul Brown, Michael Larkin and Dave Hulbert. This is a forum to discuss agent and operator concerns and test ideas.
- Naomi Sayers and Jonathan Knox – Comms
- Shaun Turner, David Hodgson – Branch Standards Team
- Sue Richardson – Network Operations Team Project & Standards Manager
- Sandra McBride, Lee Heil – New entrants process
- Warren Hattrell – Field Team Leader (representative of many at the sharp end)
- Risk & Compliance Business Partner and Product lead – varies with the topic – maybe Georgina Blair could pick this area up
- Nick Beal, Stefania Ugliati – NFSP relationship team

The Proposal

IMPORTANT: It is suggest that for each 'Stage' implementation, a 'Control Group' is used in the first instance to draw out any further enhancements that **must** and **should** be made, prior to the full rollout to the user group identified. Any 'nice-too-haves' will be documented and considered as part of any future enhancements.

It should be noted at this point that the proposed solution for new joiners described below is the same solution that would be deployed for the future stages.

- **Stage 1 – New Joiners** (before March 2014 ??)

To host the Compliance Training modules and tests online so they can be accessed by new joiners using their own devices (computers, laptops, tablets, smart phones) at a time that is convenient for the user.

The new joiner would be provided with a 'link' to access a secure site at which point they would be required to provide the appropriate registration details, including a user name and password, which will be linked to that individual as an employee/agent of the post office (i.e. traceable against known individuals for example by pay no?). Once completed, the user would have access to all the appropriate compliance modules and associated tests, which would then need to be completed. On successful completion, the user would be issued with a 'Pass Certificate' for each compliance module which would be stored locally (for future user access) and centrally (for management and audit purposes). The 'Pass Certificate' would be available for printing as a physical record from the site, emailed and potentially sent as a PDF to the users mobile device

In relation to the management and auditing of the completion and non-completion of the modules, detailed reporting will be provided and 'Super User' access will be available to the appropriate departments and individuals as requested by the business. In addition, capability can be provided in the form of automated 'alerts' which would be despatched via email and/or text message to the user where it has been identified that compliance training has not yet been completed. These same alerts could also be made available to the management team for appropriate action to be taken.

The Benefits

- ✓ No need to provide physical work books as the content is held online

- ✓ No need to complete the manual test that then requires marking by the trainers, as the test and marking is fully automated online.

- ✓ Removes the requirement on the trainers to mark the tests, as this is provided by the automated online solution.

- ✓ No need to complete the compliance test again on Horizon in order to obtain the 'Pass Certificate, as this is provided on successfull completion of the online test.

- ✓ A solution that enables the user to complete the compliance module at a time and place that is most appropriate. (including at home on their own devices)

- ✓ A proof of 'pass' solution that offers flexibility to prove that the user is compliant, via a physical pass certificate or a pdf version held on a mobile device.

- ✓ A user repository that can be accessed to obtain the 'Pass Certificate' when it has been lost, removing the need to retake the test on Horizon.

✓ A central management, reporting and audit solution providing real-time information that can be used to proactively take action on compliant and non-compliant results. This does not currently exist based on the information provided to date.

✓ An efficient and effective solution for delivering updates, amendments and new compliance modules, when required. Potentially, overnight dependent on the nature of the change.

✓ Potential removal for the need to physically audit a branch, as the required information is available from a central online repository.

✓ A mechanism that can be used to demonstrate to the Information Commissioner's office and regulatory bodies, as well as 3rd party business partners and clients (e.g. Govt, CAA) that Post Office Ltd have a robust and auditable solution in place to deliver and manage compliance for staff providing products and services within our branch network and that we are therefore compliant with both our legal and contractual obligations.

✓ Data matching and live feed between the Learning Management System and the HR Management System/Branch Network Personnel Database?

Need to obtain visuals from EMC – workshop to be arranged

Future Rollout

• **Stage 2 – Directly Recruited by Agency Branch** (before March or June 2014 ??)

Basically rollout the solution described above. However, consideration needs to be given to the P250 process and how this can be linked to compliance training completion. **Need to discuss with the appropriate stakeholder community.**

• **Stage 3 – Existing Agency Branch Colleagues** (before September 2014 ??)

Basically rollout the solution described above, with a few tweaks. **Need to discuss with the appropriate stakeholder community.**

GAYLE PEACOCK: I would like to test here this in conjunction with the availability of tablets/devices

• **Stage 4 – Existing Directly Managed Branch Staff** (before March 2015 ??)

Basically rollout a similar solution tailored for directly managed staff. **Need to discuss with the appropriate stakeholder community.**

GAYLE PEACOCK: I think this one could be rolled out first and pilot the approach as all Crowns have access to a computer.

The initial and future rollout proposals are subject to change following consultation with the Business Sponsor and appropriate stakeholders