



# Internal Compliance Program – Series (17) – Training

Today, in the seventeenth article in the hands-on practical advice series on Internal Compliance Programs for Export Control:

## Part 17: Training

Training and awareness raising on trade control is essential for staff to duly perform their tasks and take compliance duties seriously. This is critical, due to the dynamic nature of international and local trade control regulations, and sanctions and embargoes. All compliance policies, procedures, and “best practices” in the world are worthless unless they are known, correctly understood, and followed by employees. Even worse, they may create a sense of false security.

When setting up an adequate export control training, you may consider the following:

- ensure that the trade control staff is aware of all relevant export control regulations as well as the company's ICP and all amendments to them
- use different types of training, e.g. workshops, webinars, external seminars, subscription to information sessions offered by competent authorities, in-house training events
- include self-guided training by digital means
- offer customized training upon staff request
- carry out awareness raising on export control issues for employees at all relevant levels
- incorporate lessons learnt from performance reviews, audits, reporting and corrective actions, whenever possible, in your training or export awareness programs
- ensure that corporate training programs are conducted regularly and frequently enough
- pay attention that deadlines for completing or renewing training are enforced
- ensure that training content is being updated
- deploy every training with a closing test or questionnaire to verify knowledge retention.

In your ICP, you should:

- appoint the responsible person(s) for overseeing export compliance training
- appoint the (internal and/or external) trainers nominated for conducting the export compliance training, and include their qualification for export control issues
- indicate staff to be trained (with a timetable for new employees and existing employees)
- mention the types of tailored training to be provided

- define the topics of the training to be provided to senior management, to all new employees (introductory training), to employees with export-related jobs (intermediate training) and export compliance personnel (advanced training)
- describe measures foreseen to implement awareness raising activities
- mention how often will training be provided and/or required
- describe the means to document training and maintain detailed training records
- indicate the means to keep training materials relevant and up to date
- define how results performance reviews, audits, reporting and corrective actions will be integrated into training or trade control compliance awareness programs.

