IMS Health: Raising staff awareness through e-training

PL&B International talks to **David Trower**, chief privacy officer for IMS Health, about the challenges of rolling out an e-training programme to the company's European employees.

E-training courses are increasingly being used by multinationals to raise staff awareness and can be an effective way to spread the data protection message across an organisation. But according to David Trower, rolling out a programme across a number of countries is more than just a case of bolting new software onto your corporate intranet.

IMS Health is a global provider of information to the health sector, collecting and analysing anonymised medical data which is utilised by

compliance audit indicated there was room for improvement on staff awareness of privacy issues.

But why choose e-training over the more traditional classroom-based awareness programmes?

"The traditional method has a certain inflexibility and dullness about it," explains Trower. "So we thought that a web-based course could be designed to be quite interactive and user-friendly, engender some interest, while at the same time be very flexible, in that people could do the course at their own leisure and new

SETTING UP THE PROJECT

IMS' work on the project started at the end of 2002 with the plan to roll out the course to around 2,000 staff across seven European countries: the UK, France, Belgium, the Netherlands, Germany, Spain and Italy. To help manage the process, Trower appointed a project manager from the IMS legal team, as well as setting up a steering group comprising of representatives from IT, HR, legal and internal communications.

As the course was targeted at all staff from all levels across the organisation, the issue of where to pitch the content became a significant dilemma, he explains. Do you keep the course simple and straightforward, or do you include plenty of high level detail? "Ideally you want it at two levels," he explains, "with basic information for everyone, and then more detailed messages for key people, whether they be in security, marketing, or HR."

"In the end, you have to balance it against resources, and to have two versions of the course would largely have cost twice as much."

So instead, IMS decided to stick with one version of the course with the content pitched in the middle. "There's always a balance to be made," says Trower, "because we're a commercial organisation and we have to do things as cost effectively as possible."

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health researchers, governments, pharmaceutical and biotec companies. Operating in a sector where the confidentiality of such sensitive data is paramount, provides organisations such as IMS with a strong incentive to implement high privacy standards, not just for the health information they process, but for client and employee data as well.

Strong internal procedures and policies are the bedrock of a good compliance regime, but at the end of the day they are nothing if not backed up with training to ensure that staff who process personal data understand their responsibilities.

Trower says that IMS decided to go ahead with an e-training programme after results from a data protection

people, as part of their induction programme, could also do the course."

One of the advantages of e-training, he says, is that it is much more visually stimulating than traditional training methods, where lawyers or consultants tend to come in and run through a slide show of data protection principles. Packages using graphics and animation avoid the 'boredom factor' while interactive elements that get staff to answer multiple choice questions or complete quizzes help to reinforce key privacy messages. Add to that mix the flexibility of a package that can be used anytime, anywhere and you have a programme that is ideal for large organisations trying to reach out to thousands of staff.

TAILORING CONTENT

In developing the programme, IMS chose to partner with *Easy i*, a provider of interactive e-training programmes. One of the reasons for choosing the *Easy i* course, says Trower, was because it allowed them to adjust and tailor the content to

make it more relevant to their staff. "We took the *Word* version of the course and customised it for our own company," he explains. "So we looked at the particular issues that are relevant to us, whether it be market research, the anonymisation issues that we have, or data transfers."

Flexibility was also required to roll out the course across different countries. Aside from the obvious language differences, the content of the training package had to be adapted to reflect variations in national laws. Trower explains that they started off with a master version of the course for the UK, and then used in-house counsel and external lawyers to adapt the master copy to address local variations such as response times to subject access requests, or definitions of data protection terminology such as what is 'personal data' or what is a 'data controller/processor'. They also tailored the 'enforcement' section of the course to add on country-specific examples of privacy breaches.

Once the legal side was completed, the content was then professionally translated into the correct languages and sent back to *Easy i* to make the software changes and carry out testing.

ROLLING OUT THE PROGRAMME
In delivering the course to staff, says Trower, input from the internal communications team was vital. "Clearly, one of the most important things was the communication about the rollout of the course, because you can't just dump it on people's laptops." The process involved a communication from the European President at IMS to reinforce the importance of the programme, in addition to keeping departmental line managers in the loop and explaining to them how the programme would be run.

Before launching the course to staff, they also carried out a final testing stage in each country. "We tested it on a few guinea pigs, both to see whether they could follow the course in terms of the content – whether it was too hard – and also in terms of whether the software was working."

ASSESSING THE RESULTS
One of benefits of most e-training programmes is that they enable companies to gain greater feedback into whether the programme has worked. Management reporting tools help the administrators to not only find out who has done the course, but how well they performed.

Trower stresses that although IMS monitored staff performance, the course was not designed to catch people out. There were no disciplinary procedures for failing the course, he explains. "It's simply an interactive and cooperative process. If we find that people keep failing, we'll go back and provide assistance and additional support."

Aside from one or two minor technical glitches, Trower says the course went extremely well, with an excellent response from employees. "I haven't had any negative feedback at all. People have said they found the course really interactive."

He has also seen a noticeable difference in staff awareness. "You can see the results when you speak to people who come for advice," he says.

"They're clearly much more educated since they've done the course. I think it's been a real success."

Overall Trower says e-training is both a flexible and effective way to raise staff awareness. But, he warns that companies thinking of adopting similar programmes should bear in mind that things can often take longer than you expect. IMS set itself an ambitious timeframe, rolling out the programme on a consecutive country-by-country basis in under a year. "I think that if we were to do it again," he says, "we would do it slower. You have to be realistic about the amount of time you give to it. Because it is quite a complex process – in terms of the number of countries dealing with difficult issues, and the complexity on the IT side."

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E-TRAINING: For details about *Easy i*'s data protection and privacy training programmes see www.easyi.com