Infinitas Learning is a dynamic educational resources company, and one of Europe’s leading providers of innovative and engaging products and services for teaching and learning. Due to its strong presence in the United Kingdom and the international orientation of its business areas, Infinitas Learning was prompted to implement a compliance management system with a focus on anti-corruption after the introduction of the UK Bribery Act in 2010.

Analysis and consultation
digital spirit began the compliance process at Infinitas Learning with a baseline study to determine the status quo and establish what the company needed from the compliance organization, since not every company has the same objective in terms of compliance. Building on this, digital spirit evaluated the relevant compliance risks arising from the UK Bribery Act and the Guidance of the Ministry of Justice. A suitable list of measures was developed and the requirements of the company were recommended in terms of a compliance management system (CMS) that would allow significant compliance risks to be reduced.

Implementation
In the first phase, the executive board named a Chief Compliance Officer at Infinitas Learning, together with whom digital spirit worked on a compliance commitment as part of the ‘tone from the top’ strategy. During the initial risk analysis, digital spirit conducted individual interviews with experts and responsible parties. The results were used to develop a Code of Conduct and a more extensive set of anti-corruption guidelines. During implementation, it was important to ensure that employees recognized the personal value of compliance. This is because well-defined standards of conduct reduce uncertainty while offering personal protection.
Compliance organization
At the same time, a compliance organization was established. A Chief Compliance Officer (CCO) was assigned to report directly to the executive board, and a compliance manager was appointed for each subsidiary. Together with the supervisors, they are the local contact persons for employees, service providers, and cooperation partners. The compliance managers took part in classroom seminars in preparation for the task. They received a toolbox with important information on the CMS as well as presentation and report templates to assist them in their day-to-day tasks.

Compliance communication
digital spirit developed an awareness campaign for Infinitas Learning in order to ensure acceptance and integration of the newly created compliance structure into everyday working life. It informs both employees and business partners about the compliance program.

The campaign was kicked off by the CEO and CCO with a multilingual “tone from the top” video, which was simultaneously sent to all employees via e-mail. Each employee also received a brochure containing the key information from the Code of Conduct and the anti-corruption guidelines. The introduction of the CMS was supported by a poster campaign and a compliance door hanger.

Another part of the communication campaign is the compliance area on the company’s intranet site. All information on the subject of compliance can be found here. Other features include a FAQ section, the contact information of the compliance officers, and information on whistleblowing.

Infinitas Learning’s business partners and the general public were provided with an information sheet containing all of the key facts on the new compliance guidelines and information on the website.

Compliance training
In order to maintain long-term awareness and expand knowledge on proper conduct, all employees were given access to a multilingual, web-based training program. The training program provides details on the Code of Conduct and another short video from the CCO communicates the management’s commitment to compliance. digital spirit rolled out the tutorial on a learning management system as well as tracking and reporting.

Compliance as an ongoing task
After having addressed the main risks from the UK Bribery Act in the ‘first wave,’ compliance is undergoing continual development at Infinitas Learning.

digital spirit assists Infinitas Learning in regularly reviewing all compliance measures for appropriateness, effectiveness, and sustainability.

Risk monitoring is used to identify new topics and target groups and to initiate additional communication and training measures. For example, high-risk target groups can receive special, more extensive training.

digital spirit is constantly refining reporting and whistleblowing systems to bring compliance closer to operational procedures. Thus, compliance goes from being a formality to becoming integrated into everyday business life.