

Escalation Protocol and Accountability Measures for Incomplete WMGTS Training

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IDC & CBE Office Associate - ULearn Activities

Timeline	Action	WMGTS Training Notifications
Initial Assignment	<p>Learning activity appears in the "Required" section of the target associate's dashboard in ULearn</p> <p>ULearn will send the assigned associate a notification once training is assigned.</p>	ULearn will send the assigned associate a notification once training is assigned. This will generate awareness of upcoming training.
14 Days before due date	Reminder email notification via ULearn	14 days prior to learning activity's due date, ULearn will send a notification reminding the associate that they have required training that needs to be completed. Associate's manager is not copied on this notification.
Expired (1 day past due)	Reminder email notification via ULearn + manager is copied on notification	The day after an associate goes past the learning activity's due date, they will receive an overdue notification reminding them to complete their required training. An associate's manager is copied.
Expired (14 days past due)	Reminder email notification via ULearn + manager is copied on notification	A second notification will be sent 14 days after an assignment is late. An associate's manager is copied.
Expired (30 days past due)	Reminder email notification via Ethics & Compliance Lead.	Monthly, a non-completion email will be sent by Ethics & Compliance Lead or designee to overdue associate. An associate's manager will be copied on this email. Pillar lead may be copied also, where applicable or deemed relevant by Ethics & Compliance Lead or designee. This may be done via an individual email to the overdue associate or a an email with consolidated list of those overdue.

* It is at the discretion of business leaders receiving escalation notices to individually determine who is accountable, as well as what actions are to be taken.

IDC & CBE office – Instructor Led Training (ILT) Activities

Timeline	Action	WMGTS Training Notifications
Initial Assignment	ILT training drops into associate's <i>Required Trainings</i> in ULearn when they meet audience requirements.	Ethics & Compliance Lead or designee will send an invitation to the training session.
Make-Up Session	Make up planner to associates who do not attend initial session.	Ethics & Compliance Lead or designee will send a make-up planner to pending employees.
Overdue session	Make up planner to associates who do not attend make-up session.	Ethics & Compliance Lead or designee will send an overdue planner to overdue employees, notifying of possible escalation. Associate supervisor may be copied on this planner, subject to decision from Ethics & Compliance Lead or designee.
Non-Compliance session	Make up planner to associates who do not attend overdue session.	Ethics & Compliance Lead or designee will send a non-compliance planner to overdue employees, notifying of possible disciplinary action if no attendance. Associate supervisor may be copied on this planner, subject to decision from Ethics & Compliance Lead or designee.

* It is at the discretion of business leaders receiving escalation notices to individually determine who is accountable, as well as what actions are to be taken.

Accountability Measures

Currently, there is no known language in any policy at IDC that addresses timely completion of assigned training. Therefore, it is at the discretion of business leaders to individually determine who is accountable, as well as what actions are to be taken based on completion reports and notifications available. At Ethics & Compliance Lead's discretion, supervisors / pillar leads may be copied on non-completion escalation emails.

Evaluating Completions and Supporting Associate Completion Rates

IDC Ethics & Compliance group will monitor training activity completion rates for Associates. Starting in FY2026 IDC Ethics & Compliance group members will engage with Pillar Leads / Leadership to address functions who have significantly low compliance training completion rates.