

# NovaPay – Document 10: Training & Culture Program

Version: Content-Only | Generated: 20 Oct 2025 | Company: NovaPay (UK)

## Program Structure

Onboarding training (2 days), annual refresher (4-hour online), and role-based modules (KYC, TM, sanctions). Ad-hoc regulatory updates are issued following material changes. Content blends internal material with ACAMS resources.

## Completion and Effectiveness

Completion 94% (target 98%); pass mark 80% on quizzes. Culture surveys show pockets of “box-ticking” attitudes in product and growth teams.

## Role-Specific Content

KYC analysts: identity and UBO verification, SoW/SoF. TM analysts: typologies, alert narratives, SAR quality. Sanctions specialists: OFSI/OFAC case studies. Frontline ops: red flags and escalation.

## Speak Up and Ethics

Whistleblowing policy and hotline; anti-retaliation statement; quarterly CEO message reinforcing tone-from-the-top; 25 “compliance champions” across departments.

## Disciplinary Measures

Three disciplinary actions in past year for policy breaches (password sharing; delayed alert handling; unauthorized data export).

## Weaknesses

(1) Completion below target; (2) Content generic and not tailored to NovaPay’s crypto/cross-border risk; (3) Limited coverage of emerging typologies (AI, DeFi); (4) No bespoke training for senior management; (5) Effectiveness testing relies on MCQs only; (6) Culture survey flags “box-ticking.”

## Improvements

Modularize by product/risk (Q2 2026); scenario-based assessments and practical SAR writing clinics (Q1 2026); senior leadership workshops (Q1 2026); monthly microlearnings; crypto/AI typology series (Q2 2026).

## KPIs (Q3 2025)

Completion 94%; survey engagement 72%; average quiz score 86%; training overdue population 6% (target <2%).

## Conclusion

Program coverage is solid but needs sharper tailoring and stronger effectiveness testing to shift culture from compliance as obligation to compliance as capability.