Assessment Plan – Senior Compliance and Risk Specialist

SUMMARY

This Assessment Plan covers the Senior Compliance and Risk Specialist apprenticeship developed by employers with input from participating Professional Bodies and several Training Providers. This is a core and options standard, so the apprentice will have chosen one of the options.

The plan has been designed to deliver a robust, cost effective and manageable assessment of competence in the role, based on the expected numbers of apprentices.

The focus of the apprenticeship is primarily on individuals who are new to the role and starting their career journey through the organisation. The approach to assessment is based on the following principles:

- Assessment should show how well the individual is performing in the role and whether they have met the requirements of the Standard.
- It should have maximum relevance to the real job that the apprentice is doing to truly test full competence in the role.
- It should integrate with business-as-usual processes wherever possible e.g. performance management, personal development.
- It should add value to the apprentice's journey, both during and at the end of the apprenticeship, so that this is seen as helping them build not only competence in the role, but also a career in the organisation wherever possible. This should include giving them feedback on their development needs as part of the end-point assessment where relevant.
- It should give assurance to the employer that the assessment is being delivered in a consistent, independent and appropriate manner.

The major components of the apprenticeship, as it evolves throughout the period, and the roles of each of the major parties are shown in the diagram below. The timings and content are an example, assuming a 36-month apprenticeship. Within this are contained the professional qualification, development of organisation specific knowledge, the skills and behaviours required to do the role, any on-programme assessment that the employer chooses to do, the gateway and the end-point assessment.

Month	Apprentice	Employer	Training Provider	Professional Body	Independent Assessment Organisation/ Assessor
0	Understand job role and apprenticeship commitment.	Deliver induction training and understand role in apprenticeship.	Explain apprenticeship, roles, timetable and commitments. Completes SFA admin requirements.		
1-30	Works to role objectives/KPIs/training plan. Develops Knowledge, Skills, and Behaviours.	Manages as any other employee, including Performance Management via monthly 1-to- 1s, etc. Provides support and	Monitors progress, identifies gaps, delivers apprentice learning and support as required. Completes SFA admin requirements. Provides support and training.	Provides qualification content/support.	
3-33	Studies and takes qualification.	coaching.		Provides qualification exams/ assessments and results.	
c.30	Continues building required Knowledge, Skills, and Behaviours.	'Gateway' to end-point assessment Employer and TP review progress and agree whether Apprentice is on track to achieve the competency levels required by the Standard.			
30-31	Apprentice, Employer, and TP work together to agree the make-up of the 3 elements of End-point Assessment (Project, Portfolio, and Interview). TP signs off against Assessment Plan requirements.				
31-35	Completes Project and Portfolio. Submits for assessment. Prepares for their Interview.	Reviews Project and Portfolio. Supports preparation for the Apprentice's Interview.	Supports completion of Project and Portfolio, reviews and submits for assessment. Supports preparation for Apprentice's Interview.		Assesses Project and Portfolio. Prepares for Apprentice's Interview.
36	Takes part in their Interview.	Informs Apprentice of result.	Completes SFA admin requirements.		Conducts Apprentice's Interview and decides grade.

Professional Qualifications – the standard contains a range of qualifications from which the employer must choose the most relevant one(s) as the mandatory qualification. These are as follows:

- International Compliance Association Diploma in Anti Money Laundering; Diploma in Governance, Risk, Compliance; Diploma in Bus Compliance; Diploma in Financial Crime Prevention; Advanced Cert in Anti Money Laundering; Advanced Cert in Practical Customer Due Diligence; Advanced Cert in Compliance; Advanced Cert in Managing Fraud
- Chartered Institute of Securities & Investment Diploma in Investment Compliance
- London Institute of Banking & Finance Chartered Associateship Programme
- **Chartered Banker Institute** Associate Chartered Banker Diploma; Chartered Banker Diploma; Professional Bankers Certificate; Professional Bankers Diploma
- Chartered Insurance Institute Advanced Diploma in Insurance; Diploma in Insurance
- **Chartered Institute of Credit Management** Diploma in Credit Management; BA(Hons) Credit Management; CSA Diploma in Compliance Risk Management
- Institute of Risk Management International Certificate in Risk Management; Certificate in Risk Management in FS; International Diploma in Risk Management

In addition, the employer may wish to consider the following optional qualifications to help the apprentice reach competence in the role:

Chartered Banker Institute – UK Financial Services, Regulation and Ethics

On-programme Assessment (dark blue in diagram) – our recommended approach to ensuring that the apprentice is on track during the apprenticeship is based on the employer's Performance Management (PM) process with the following key elements:

- Line Manager uses the formal PM process and regular 1:1s to discuss progress in the apprenticeship, provide feedback and guide development.
- Training Provider can support this (if required) by ensuring that the requirements of the apprenticeship are reflected in the PM process and filling any gaps through their work with the apprentice.
- Training Provider can also support the apprentice on understanding the learning journey, providing advice and guidance on learning strategies and tools that will support the apprentice's preferred learning style and improve their learning agility.
- Regular check points between the Line Manager and Training Provider (aligned with the PM process) to ensure that the apprentice is on track and agree how any issues will be addressed.
- Apprentices should be strongly encouraged to create a learning record that contains examples of their learning and areas for development/action points as they go through the apprenticeship this can be used in reviews with the Line Manager and Training Provider as well as contributing to the Portfolio submitted as part of the end-point assessment. This learning record should be kept online wherever possible.

On-programme assessment will include the qualification(s).

The decision as to when the apprentice is ready to move on to the end-point assessment (the Gateway – yellow in the diagram) will be made by the Line Manager and the Training Provider, based on their monitoring of the apprentice's progress against the requirements of the standard.

End-point Assessment (green in the diagram) – this contains 3 components which are described in more detail in the next section:

- A Project that demonstrates the capability of the apprentice to deliver the core of the role
- A Portfolio of Evidence, including reflective learning, created through the apprenticeship, which contains a range of types of evidence and supports the Project, focusing particularly on the remaining areas of the standard
- A structured Interview with an Independent Assessor that will focus primarily on the skills and behaviours of the Standard, testing the competence of the apprentice as well as exploring the Project, the content of the Portfolio, how it has been produced, and how well they are performing in their role.

Assessment Method	Area Assessed	Assessed by	Grading	Indicative Weighting
Project	Whole standard	Independent Assessor	Fail / Pass / Distinction	30%
Portfolio of Evidence	Whole standard	Independent Assessor	Fail / Pass / Distinction 70%	
Interview	Whole standard	Independent Assessor		

END-POINT ASSESSMENT

1. What is being assessed

The Standard describes the learning outcomes for each area of knowledge, skill and behaviour within the Standard. This is attached in Appendix 1. The Independent Assessment Organisation will develop detailed assessment criteria for each of the learning outcomes and these will be found in the Assessment Tools that will be developed after approval of the Assessment Plan. These will be held by the Independent Assessment Organisation.

The end-point assessment will be synoptic and cover the knowledge, skills and behaviours included in the Standard. Some knowledge will be evidenced implicitly through the skills demonstrated by the apprentice, e.g. giving appropriate compliance advice to the business requires the regulatory knowledge to do that; use of systems and processes required to do the role demonstrates the knowledge.

2. How will assessment be carried out

The focus of the end-point assessment is on the apprentice being able to demonstrate competence in the role and meet the criteria set out in the Assessment Tools, illustrating this through the work that they have done. It takes place in the last circa 3 months of the apprenticeship, once the apprentice has met the Gateway criteria, and consists of the assessment methods described below.

The content and structure of these methods including the grading criteria will be provided by the Independent Assessment Organisation to ensure consistency across all apprentices. The employer, with the support of the training provider where appropriate will work with the apprentice to agree how the apprentice goes about completing the components of the end-point assessment and will provide guidance along the way as required. The employer/training provider will ensure that the content meets the Assessment Plan requirements, but do not have a role in the formal end-point assessment or decision.

The methods of assessment will build up a cumulative picture of how well the apprentice has met the requirements of the Standard, using the assessment criteria that will be developed from the Detailed Standard. We have given indicative weightings to show the relative importance of the assessment methods in the previous table. The Independent Assessment Organisation will ensure the outcome is consistent and robust.

2.1. Project

This is most likely to be a work-based project that contains real activity done in the role, such as a significant compliance or risk project that demonstrates many of the aspects of the standard. It will be completed after the Gateway, i.e. in the last few months of the apprenticeship. It should describe what the apprentice did, how they did it and the benefits that resulted from the project. For example, it might cover how the apprentice dealt with a significant compliance / risk issue facing the business, describing how they analysed the problem, researched the regulatory requirements, developed options, worked with colleagues and the business to develop an agreed solution, influencing both up and down the organisation to achieve resolution, before implementing that solution. It will typically be related to the specific option that the apprentice has chosen from the Standard.

Guidance for the content, format, length and typical scope of the project will be developed by the Independent Assessment Organisation and included in the Assessment Tools.

The Project will initially be reviewed by the employer with the support of their training provider if appropriate against the standard. When they are agreed that the apprentice has met or is clearly on track to meet the pass criteria for the Standard, the Project will be sent to the Independent Assessment Organisation for assessment by the Independent Assessor.

2.2. Portfolio of Evidence

The Portfolio contains evidence from real work activity by the apprentice that has been built up progressively through the apprenticeship and will illustrate the application of the knowledge, skills and behaviours within the Standard synoptically. It will complement the Project, focusing particularly on those areas of Knowledge, Skill and Behaviours that are not evidenced in the project. It will draw on any learning record created by the apprentice, showing how they have applied what they have learned.

There are likely to be several types of evidence within the Portfolio, which may include written work, small projects, performance review information, workplace observations, case studies, learning record entries, development plan content, emails, customer comments etc. Wherever possible, this will be an e-portfolio or other electronic platform. The structure of the Portfolio will be included in the Assessment Tools.

The Portfolio will initially be reviewed by the employer and Training Provider if appropriate against the standard with a particular focus on how well it complements the Project and completes the evidence of competence in the role. When they are agreed that the apprentice has met or is clearly on track to meet the pass criteria for the Standard, the Portfolio will be sent to the Independent Assessment Organisation for assessment by the Independent Assessor, in combination with the Interview

2.3. Interview

This is a structured Interview between the apprentice and an assessor from the Independent Assessment Organisation. The selection criteria for the Independent Assessor is set out in the next section.

The Interview will cover the knowledge, skills and behaviours in the standard, although focusing more on the skills and behaviours (e.g. analysis and problem solving, communicating and influencing), exploring what has been produced in the Project and the Portfolio, what was delivered in the Project, and how well they are performing in their role. It is expected to last between 90 and 150 minutes. A more accurate length will be provided in the assessment tools. This enables a synoptic assessment of the Standard as a whole to check coverage of the broad range of knowledge, skills and behaviours contained in the Detailed Standard.

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The purpose of the Interview is to:

- Explore evidence for areas of the Standard that are best assessed verbally, particularly the skills and behaviours.
- Discuss the Project, the results delivered and the approach taken
- Clarify any questions that the Independent Assessor has about the evidence submitted in the Project and Portfolio
- Provide the basis for the Independent Assessor to decide the grade to be awarded.

A structured brief will be provided in the assessment tools to be used in the Interview. This will ensure that consistent approaches are taken and that all key areas are appropriately explored. It is likely to be carried out face to face, but some circumstances may require it to be conducted remotely, e.g. video conference or Skype, depending on numbers and locations of apprentices.

The combination of these assessment methods builds a cumulative picture of performance against the Standard. They require apprentices to demonstrate the application of knowledge, skills, and behaviours in an integrated manner to deliver the required outcomes, enabling the Independent Assessor to make an holistic judgement about how well the apprentice meets or exceeds the Standard.

3. Who carries out the assessment and makes the final judgment

There are three parties involved in the final stages of the apprenticeship and the end-point assessment – the employer, the training provider and the Independent Assessor. Their respective roles are as follows:

Assessor	Role		
Employer	 Brings a view of the apprentice from PM and working with them in the workplace through the apprenticeship Has greatest clarity about whether the apprentice is fully competent in the workplace Reviews the Project and Portfolio and makes a judgment about whether they meet or are likely to meet the standard before submission to the Independent Assessment Organisation Plays no part in the end-point assessment itself 		
Training Provider	 Brings a view of the apprentice from supporting them through the apprenticeship Brings greater understanding of the assessment process than the employer and hence broader view on competence Provides advice and guidance on the assessment process Reviews the Project and Portfolio, provides feedback and advises on whether they are likely to meet the standard before submission to the Independent Assessment Organisation Plays no part in the end-point assessment itself 		
Independent Assessor	 Brings a completely independent view to the end-point assessment as they have had no engagement with the apprentice until now Reviews the Project and Portfolio independently and scores against the assessment criteria remotely Conducts the Interview Makes the final decision on the grade to be awarded to the apprentice Makes the final decision on any appeal about the grade awarded 		

It is the Independent Assessment Organisation that will make the final judgment on the grade to be awarded to the apprentice, whether Fail, Pass or Distinction. There will be a right of appeal against this decision as outlined in the next section.

Within Financial Services, line managers have a regulatory responsibility to the Financial Conduct Authority to ensure that all their people are trained and competent to perform their role. They therefore have a strong vested interest in making the assessment process robust in support of the Independent Assessment Organisation.

To ensure that any Independent Assessor is competent, they will be trained in the assessment process (see next section) and will also have to meet certain criteria which will include:

- Minimum 5 years' experience working in compliance or risk; a qualification in compliance or risk; familiarity with the role covered by the apprenticeship.
- Compliance or risk technical and management expertise to ensure they can assess all areas of the Standard.
- Understanding of the qualification used within the apprenticeship.
- No current relationship with the apprentice/employer involved in the apprenticeship.

The Independent Assessment Organisation will be responsible for appointing an Independent Assessor to carry out the end-point assessment.

Any organisation is eligible to deliver assessment services against this standard, by meeting the requirements of the SFA's Register of Apprenticeship Assessment Organisations. Individual employers must select an organisation from that Register to deliver assessment services for this standard, however it is strongly recommended that a Professional Body is selected to undertake the end-point assessment.

It is strongly recommended that the Independent Assessment Organisation has:

- Sound understanding of the sector (Independent Assessors who have worked in and have a qualification in compliance/risk) and the assessment requirements for this Standard, together with the expertise to administer the Assessment Tools required.
- Capability to deliver assessments at the scale and with the levels of service required, giving confidence that this is a strategic part of their business.
- Geographical coverage required.
- Independent Assessors with the background specified above
- Robust verification and quality assurance processes that can ensure the end-point assessment is of the required standard.

4. Independence

Within our assessment approach, independence is achieved through the end-point assessment being carried out by an Independent Assessor who has not had any involvement with the apprentice or the delivery of the apprenticeship. The Independent Assessment Organisation appoints the Independent Assessor who will make a synoptic assessment of each apprentice's work, including the grade to be awarded, on the basis of evidence supplied in the Project, Portfolio, and Interview.

5. Quality Assurance - Internal

The responsibility for the robustness of the assessment process is held by the Independent Assessment Organisation. The overall responsibilities of the Independent Assessment Organisation are summarised below:

- Ensures there are robust processes in place to deliver assessments to the required standard and that they are appropriate for the sector
- Develops and maintains a set of Assessment Tools that are used by all to carry out assessments
- Provides Independent Assessors that meet the requirements set out by the Employers
- Trains and certifies all individual Independent Assessors to be able to assess consistently against the Standard
- Applies robust quality assurance and verification processes to the assessments, e.g. use of standard formats, moderation, and standardisation of scoring, oversight of assessment

- Runs the appeal process for any appeals that arise from grading decisions
- Reports to the Employers on any issues that arise

The Independent Assessment Organisation will create and then maintain the Assessment Tools to ensure continuing robustness (independent, consistent, accurate), working with the Employers as appropriate.

The assessment methods described previously are designed to produce assessment outcomes that are consistent and reliable, allowing fair and proper comparison between apprentices employed in different types and sizes of organisations. At the core of this will be the set of Assessment Tools that are used by all assessors and will be a part of the training that assessors receive. The Independent Assessment Organisation will create and hold the tools, materials and techniques to be used in assessment based on this Plan. These tools will be reviewed with the Employers before being implemented.

All Independent Assessors will be required to have the skills and experience outlined in the previous section. They will be trained and approved by the Independent Assessment Organisation to ensure that they can use the tools developed for assessment in a fair and consistent manner to make reliable judgments.

The Independent Assessment Organisation will provide robust validation and quality assurance processes (e.g. external examiner to give oversight to the assessment process) to ensure that all assessments are robust, that they assess fully against the Standard, are undertaken consistently and to the same standard and that the individuals carrying out the assessment have the requisite skills and industry experience. These will be developed as part of the Assessment Tools to ensure that they are consistent across all apprentices. Immediate and appropriate action will be taken where any quality concerns are identified.

6. Quality Assurance – external

External quality assurance of the end-point assessment for this apprenticeship standard will be undertaken by the Institute for Apprenticeships and Technical Education.

7. Grading

This standard will have Fail, Pass and Distinction grades. The Distinction is designed to recognise the small proportion of apprentices who are seen as outstanding employees, regularly going beyond what is required to be competent in the role and seen as having the greatest potential for the future.

The assessment criteria for the standard will specify what is required to achieve a Pass, i.e. fully competent in the role as described in the detailed Standard.

To achieve a Distinction, the apprentice will have to meet a higher set of assessment criteria, as set by the Independent Assessment Organisation, in 5 of the Skills and Behaviours – Delivering Services, Analysis and Problem Solving, Communicating and Influencing, Teamwork, and Resilience. They must achieve a Pass in all other areas of the standard. A Distinction-level apprentice can typically be described as:

- Consistently exceeding the standards set for the role (both what is delivered and how it is delivered)
- Going beyond what is expected at this level
- Able to perform well in difficult situations or when under pressure
- Being seen as a role model by others
- Able to work upwards as well as with peers
- Showing they understand the wider context of the work they are doing

The assessment criteria to be used for both Pass and Distinction will be developed as part of the Assessment Tools and reviewed by the Employers before being used.

The Independent Assessor will make the decision on the grade to be awarded to the apprentice based on their scoring in the assessment methods used.

In the event of an appeal against the grade awarded, the Independent Assessment Organisation will carry out a further review of the evidence to confirm or modify the grade in line with their standard procedures.

IMPLEMENTATION

Whilst the major focus of this Plan is to ensure that it delivers robust and high-quality assessments that accurately assess competence against the Standard, the practicalities of implementation have been carefully considered in the light of the proposed number of apprenticeships and geographic coverage. At this early stage we expect approximately 40 apprentices in the first year. We expect this to grow in future years due to three main factors – the impact of the Apprenticeship Levy; apprenticeships becoming more established in the sector with stronger links to career paths; apprenticeships becoming a more acceptable alternative to full time Higher Education.

The main factors that will make our approach implementable and cost effective at the numbers of apprentices anticipated are:

- The use of well proven assessment methods that will allow robust determination of competence without requiring a large number of components, supported (prior to the Gateway) by industry recognised qualifications.
- The use of existing assessment expertise, assessment tools, robust QA processes to give impartial
 assessment without the need to engage an additional party and incur additional costs in the assessment.
- The ability for assessors to conduct the assessment remotely where this is most appropriate, hence not incurring any travel time or costs.
- The use of on-line methods of recording, creation and submission wherever possible.

We are confident that this approach can be used in organisations of any size within the sector, in part through flexing the role of the Training Provider to ensure the totality of the learning, on-programme assessment and guidance on the end-point assessment can be delivered.

The Professional Bodies who have qualifications included in the standard have confirmed that completing the qualification will allow the apprentice to apply for the level of professional membership that is aligned with that qualification.

As this Standard is new, we have no direct evidence of the costs of delivering this assessment approach. However, we believe that up to 20% of the costs will be spent on assessment.

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Appendix 1 – Detailed Standard

Knowledge	What is required	Learning Outcomes
Risk and Compliance Framework	Deep understanding of the Financial Services legal and regulatory framework, the role of the different regulators (if appropriate), their objectives and primary functions, the inter-relationships between them. Can clearly articulate the implications of non-compliance for their organisation.	Comprehensive understanding of the Financial Services legal and regulatory framework
		Comprehensive understanding of the role of the different regulators (if appropriate), their objectives and primary functions, the inter-relationships between them.
		Can clearly articulate the implications of non- compliance for their organisation
Industry and company understanding	Deep understanding of the structure of the Financial Services industry and in particular the role their sector and organisation plays; the purpose of the function in which they work; how their function relates to the wider business. Deep understanding of the impact the external environment has on Financial Services and their role, together with relevant best practice. Understands the organisation's 'Values', professional standards and how these are evidenced through their role. Clearly understands the purpose of the different areas of the organisation they need to work with in their role and how they support them.	Comprehensive understanding of the structure of the Financial Services industry and in particular the role their sector and organisation plays Comprehensive understanding of the purpose of the function in which they work; how their function relates to the wider business
		Comprehensive understanding of the impact the external environment has on Financial Services and their role, together with relevant best practice Understands the organisation's 'Values', professional standards and how these are evidenced through their role
		Clearly understands the purpose of the different areas of the organisation they need to work with in their role and how they support them.
Customers and Products	Sound understanding of the customer segments that the organisation delivers to, and the approach to delivering fair customer outcomes across the business - particularly for their role. Broad understanding of the products and services provided to customers by their organisation. Deep understanding of the products and services that they support, particularly as it relates to their role e.g. inherent risks that need to be managed	Sound understanding of the customer segments that the organisation delivers to
		Sound understanding of the approach to delivering fair customer outcomes across the business - particularly for their role
		Broad understanding of the products and services provided to customers by their organisation
		Comprehensive understanding of the products and services that they support, particularly as it relates to their role
Systems and Processes	Understands the systems, tools and processes used in the role, together with the standards to be met, including IT tools.	Understands the systems, tools and processes used in the role, together with the standards to be met, including IT tools
		Understands the consequences of not following processes and when to raise concerns if errors are made

Senior Compliance / Risk Specialist

Technical Knowledge	What is required	Learning Outcomes
Specialist Risk	Working knowledge of relevant risk frameworks/methodologies in Financial Services e.g. risk appetite, thresholds, key risk indicators. Deep understanding of the methodologies, tools/techniques used in their organisation for managing the specific area(s) of risk covered by their role. Examples of risk areas are: operational, conduct, credit, market, liquidity, capital, people	Working knowledge of relevant risk frameworks/methodologies in Financial Services
		Comprehensive understanding of the methodologies, tools/techniques used in their organisation for managing the specific area(s) of risk covered by their role
Financial Crime	Deep understanding of legal, Financial Conduct Authority (FCA) and other rules/regulations relevant to their role together with how these are applied within their organisation; typical risks and controls; current best practice. This may include financial crime, anti money laundering, terrorist financing.	Comprehensive understanding of legal, Financial Conduct Authority (FCA) and other rules/regulations relevant to their role together with how these are applied within their organisation
		Comprehensive understanding of typical risks and controls, together with current best practice
Compliance	Deep understanding of legal, FCA, Prudential Regulation Authority and other rules/regulations relevant to their role together with how these are applied within	Comprehensive understanding of legal, FCA, Prudential Regulation Authority and other rules/regulations relevant to their role together with how these are applied within their organisation
their organisation; typical risks and controls; current best practice. This may include know your customer, training & competence, approved persons, relevant conduct of business, data security.	Comprehensive understanding of typical risks and controls, together with current best practice	
Compliance/ Risk (for smaller organisations)	Sound understanding of the range of risk/compliance requirements for their role e.g. operational risk, financial crime, know your customer, training & competence, approved persons, conduct risk, complaints, data security. This should include both the actual legal/regulatory requirements eg FCA Handbook and the policies/procedures used by the organisation to implement these requirements.	Sound understanding of the actual legal / regulatory requirements that are relevant for the range of risk/compliance requirements in the role
		Sound understanding of the policies/procedures used by the organisation to implement these requirements.

Core Skills and Behaviours

Skills	What is required	Learning Outcomes
Strategy and Planning	Contributes to the development of strategy and operational plans for their area. Manages and reports on progress of specific elements of this in their area of responsibility. Proactively plans and organises their work, clearly identifying priorities, to meet commitments / KPIs, including regulator deadlines.	Able to contribute to the development of strategy and operational plans for their area
		Able to manage and report on progress of specific elements of this in their area of responsibility
		Proactively plans and organises their work, clearly identifying priorities, to meet commitments / KPIs, including regulator deadlines
Delivering Services	Provides support, guidance and challenge where necessary to the business in their area of expertise. Carries out all required	Provides support, guidance and challenge where necessary to the business in their area of expertise
	activities, using agreed systems and processes, to ensure that the relevant policies of the organisation for their area of specialisation are met. Works with the	Carries out all required activities, using agreed systems and processes, to ensure that the relevant policies of the organisation for their area of specialisation are met

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	business to build their expertise and	Works with the business to build their expertise and
	understanding of their responsibilities through e.g. coaching, training. Takes the	understanding of their responsibilities
	initiative to meet challenging individual and team performance measures in line with company policy, Values, standards and regulatory requirements. Delivers projects as required.	Takes the initiative to meet challenging individual and team performance measures in line with company policy, Values, standards and regulatory requirements Able to deliver projects as required.
Analysis and Problem solving	Analyses and interprets a wide range of complex business information, legal and regulatory information. Produces a range of outputs that may include	Analyses and interprets a wide range of complex business information, legal and regulatory information to develop solutions that are in the best interests of the organisation and customer
	recommendations, management reports, draft guidance, policies, procedures for internal or external use. This may involve complex modelling using appropriate tools. Works on specific and often complex problems/issues with the business, carrying out analysis, recommending solutions.	Produces a range of outputs that may include recommendations, management reports, draft guidance, policies, procedures for internal or external use
		Works on specific and often complex problems/issues with the business, carrying out analysis, recommending solutions.
Communicating & Influencing	Deals effectively with customers/ colleagues at every level of the organisation, using sound interpersonal skills and communicating well through a range of media using language that is meaningful to the recipient e.g. written reports, presentations, phone, face to face, email. Communicates complex information clearly. Listens actively to understand needs and adapts their style to the recipient. Engages proactively with customers/colleagues, including senior managers. Challenges in an appropriate way when necessary and influences managers on the desired course of action to ensure compliance/risk requirements are met.	Deals effectively with customers/ colleagues at every level of the organisation, using sound interpersonal skills
		Communicates well through a range of media using language that is meaningful to the recipient. Communicates complex information clearly.
		Listens actively to understand needs and adapts their style to the recipient
		Engages proactively with customers/colleagues, including senior managers.
		Challenges in an appropriate way when necessary
		Influences managers on the desired course of action to ensure compliance/risk requirements are met.
Teamwork	Builds/maintains strong positive working relationships with customers/colleagues /suppliers /regulators as appropriate.	Builds/maintains strong positive working relationships with customers/colleagues /functions /suppliers / regulators as appropriate
	Consistently supports colleagues /collaborates to achieve results. Aware of their role within team, how their team fits within the business and how the team's decisions impact on others. Takes a leadership role in the team when appropriate.	Consistently supports colleagues /collaborates to achieve results
		Aware of their role within team, how their team fits within the business and how the team's decisions impact on others.
		Takes a leadership role in the team when appropriate.
Continuous improvement	Identifies opportunities to drive higher performance and improve service delivered. Takes ownership/leads development of specific changes through to implementation – this may include projects wider than their role.	Identifies opportunities to drive higher performance and improve service delivered
		Takes ownership/leads development of specific changes through to implementation
Developing self and others	Keeps up to date with relevant legal/regulatory changes and alerts others to the implications where necessary.	Keeps up to date with relevant legal/regulatory changes and alerts others to the implications where necessary

Seeks feedback and acts on it to improve their performance. Builds their own	Seeks feedback and acts on it to improve their performance.
	Builds their own capability through ownership of their own development, working with their manager
	Acts as a role model and supports others in their development as appropriate

Behaviours	What is required	Learning Outcomes
Honesty & Integrity	Truthful, sincere and trustworthy in their actions. Shows integrity by doing the right thing. Maintains appropriate confidentiality at all times. Visible role model and coaches others where appropriate.	Demonstrates integrity and ethical behaviour in the way they do their job
		Treats sensitive information in a confidential way
		Visible role model and coaches others where appropriate
Flexibility	Adapts positively to changing work priorities and patterns when new tasks need to be done or business requirements change.	Able to adapt to changing business needs effectively
		Supports others in adapting to changing business needs
		Able to re-prioritise work as required
Resilience	Displays energy and enthusiasm in the way they go about their role, dealing positively with setbacks when they occur. Stays positive under pressure, taking others with them.	Displays energy and enthusiasm in the way they go about their role
		Deals objectively with setbacks when they occur, learning for the future and sharing this with others
		Stays positive when under pressure, taking others with them.