



AFB POLICY WORKING GROUPS

AFB POLICY WORKING GROUPS

A. STANDING WORKING GROUPS

- **Policy and Regulatory Network (PRN):** The purpose of the PRN is to understand and represent the policy/regulatory concerns of AFB members and advocate on their behalf with regulators and policymakers.

During meetings, AFB members have the opportunity to discuss prevalent policy and regulatory topics. Recent topics discussed include, Basel 3.1, the Foreign Influence and Registration Scheme, the FCA's approach to enforcement etc.

The Network also undertakes the following activities:

- Coordinates AFB members' responses to policy and other consultations and, where appropriate, convenes directly with (mainly UK) regulators/policymakers in roundtable and other formats on specific areas of interest
- Provides regular updates (by email) on important policy/regulatory developments
- Scans the horizon for future issues and commissions research where appropriate
- Provides networking opportunities to members
- Provides input into the AFB's programme of practice and events in relation to technical/policy matters, so that the need for educational and networking opportunities for regulatory personnel can be serviced.

The Network meets in-person 5 times a year for a 90-minute session.

- **Climate Financial Risk:** This Working Group was formed to feed into discussions and policy matters relating to climate-related risk. The WG is chaired by Bobby Charalambous, Climate Risk Director, Group Regulatory Compliance and Policy, ANZ, and meets quarterly. AFB interacts with policymakers and stakeholders including the PRA and the [Climate Financial Risk Forum](#) on this topic. Members of this group informed the February 2025 [AFB response](#) to the [HMT UK Green Taxonomy consultation](#). The WG also informed AFB's [response](#) to PRA 'CP10/25 'Enhancing banks' and insurers' approaches to managing climate-related risks – Update to SS3/19', which was submitted in July 2025. In July 2025 the WG reviewed AFB's response to a [DBT consultation](#) on UK SRS and to a [DESNZ consultation](#) on transition plan requirements, which was submitted in September 2025 ([here](#)).
- **Financial Crime Compliance:** This Working Group focuses on discussions and policy matters relating to Money Laundering Reporting in the UK. AFB is interacting with policy makers and stakeholders, including the FCA and HMT, on this topic. The WG is chaired by Carly Blades, Managing Director & Head of Europe FCC, The Bank of Nova Scotia, and Richard Wall, MLRO, Türkiye İs Bankası AS, and meets quarterly. The Terms of Reference of the WG can be read [here](#). The Working Group has submitted responses to a number of consultations in 2024 and 2025. For example the FCA [Guidance Consultation 24/4 on proposed amendments to the Guidance on the treatment of Politically Exposed Persons](#) ([here](#)), and the [HMT Consultation on improving the](#)

[effectiveness of the MLRs \(here\)](#). For reference: On 15 July 2025, the FCA published FG25/3, its finalised guidance on the Treatment of Politically Exposed Persons ([here](#)) and on 17 July 2025 HM Treasury published its response to the feedback received in response to its consultation on Improving the effectiveness of the Money Laundering Regulations ([here](#)).

- **NEDs Forum:** The Non-Executive Directors (NEDs) forum is designed to address issues faced by NEDs in balancing their responsibilities to the company and regulatory expectations. The NEDs forum convenes twice a year and provides an opportunity for attendees to benchmark against other NEDs who work with international banks and allow them to share experiences. The most recent NEDs Forum meeting was held on 12 November 2025 entitled 'How can MI evidence effective oversight by NEDS'.
- **Sanctions Compliance:** This Working Group was created in September 2025 to provide a dedicated forum for discussions on key UK sanctions policy, regulatory, and enforcement issues. The WG is chaired by Neil Whiley, Head of Sanctions, Bank ABC. The terms of reference of the WG can be found [here](#). The first meeting of the WG was held on 23 October 2025 and was attended by a representative from OFSI.
- **Tax Policy:** This WG was created to identify tax related issues specific to international banks operating in the UK. The group will identify challenges, provide insight into how that has an effect on the competitiveness of international banks operating in the UK, and propose potential solutions or more efficient ways to operate. The Terms of Reference of the WG can be read [here](#). The most recent Tax Policy WG was held on 15 October 2025.

B. AD HOC POLICY WORKING GROUPS

- **Branch and Subsidiary Supervision:** Following the collapse of Silicon Valley Bank UK, the PRA informed AFB that it was considering a review of its approach to branch and subsidiary supervision (including [Supervisory Statement 5/21](#)). AFB therefore created the Branch and Subsidiary Supervision Working Group. This group informed [AFB's response](#) to PRA [Consultation Paper 11/24 – International firms: Updates to SS5/21 and branch reporting](#). On 9 June 2025, AFB held a seminar with the PRA at PwC to discuss the regulators' final [PS6/25 'International firms: Updates to SS5/21 and branch reporting'](#).
- **Critical Third Parties:** This Working Group was formed following the FCA/PRA [DP3/22 – Operational resilience: Critical third parties to the UK financial sector](#), as well as [HMT's June Policy Statement on critical third parties](#). The WG informed [AFB's response](#) to [FCA CP24/28](#) and [PRA CP17/24 – Operational Incident and Outsourcing and Third Party Reporting](#), in collaboration with the AFB Operational Resilience/Outsourcing WG, in March 2025. AFB continues to monitor developments on this topic following the publication of [PS 16/24 – Operational Resilience: Critical Third Parties to the UK Financial Sector](#) and [joint Supervisory Statement 6/24](#).

- **Culture & Conduct:** This Working Group discusses the FCA and PRA proposals regarding D&I in financial services (FCA [CP23/20](#) and PRA [CP18/23](#)). Members contributed to AFB's responses to the consultation papers [here](#) and [here](#). This group has also discussed the regulators' proposals regarding non-financial misconduct. In June 2025 the FCA published a [Policy Statement and CP25/18: Tackling non-financial misconduct in financial services](#). The working group helped inform AFB's response ([here](#)), which was submitted on 10 September 2025.
- **Equality (Race and Disability) Bill:** This Working Group was created in April 2025 to inform AFB's response to the UK Government's consultation on the [Equality \(Race and Disability\) Bill](#), which closed for responses on 10 June. The consultation sought views on how mandatory ethnicity and disability pay gap reporting requirements for large employers (i.e., those with 250 or more employees) could be implemented. AFB submitted a [response](#) to the consultation in June 2025.
- **EU Capital Requirements Directive VI:** The final CRD VI text was published in the Official Journal on 19 June 2024 ([here](#)). Members of the Working Group meet regularly to discuss the implementation of CRD VI with peers and increase their understanding of the requirements. The most recent meeting of the WG was held on 5 November 2025.
- **FSCS Deposit Protection WG:** The FSCS Deposit Protection Working Group was formed in May 2025 to guide the AFB's response to PRA [CP4/25 – Depositor protection](#). AFB's response focused on the PRA's proposals in connection with the limit of protection available from the Financial Services Compensation Scheme, which closed for responses on 30 June 2025. AFB submitted a [response](#) to the consultation in June 2025. On 18 November 2025, the PRA published PS25/25, confirming changes to the FSCS depositor protection regime.
- **Financial Services Skills:** In 2020 the AFB became a partner member of the [Financial Services Skills Commission](#) (FSSC), which aims to ensure that the financial services sector has the talent and skills it needs for the future. This Working Group also receives biannual updates on the work of FSSC.
- **Foreign Influence Registration Scheme:** The Foreign Influence Registration Scheme (FIRS) WG was established to guide the AFB's response to the Home Office request for feedback on the draft FIRS guidance. The scheme went live on 1 July 2025. The AFB continues to monitor the Home Office's approach to FIRS.
- **Operational Resilience/Outsourcing:** The Working Group was initially formed in 2020 in response to PRA and FCA consultation papers on operational resilience and outsourcing. On 5 February 2025 the PRA held a roundtable to discuss with the WG its supervisory expectations for category 2-4 subsidiaries on operational resilience ahead of the 31 March 2025 deadline for the full implementation of all aspects of the PRA's operational resilience policy ([SS1/21](#)). In March 2025 the WG informed [AFB's response](#) to [FCA CP24/28](#) and [PRA CP17/24](#) – Operational Incident and Outsourcing and Third Party Reporting, in collaboration with the AFB Critical Third Parties WG.
- **PRA Future Banking Data:** This group was originally formed in March 2021 to discuss the Bank of England's data transformation plan, aimed at improving alignment of data collections with the needs of day-to-day supervision, improving integration and streamlining of data collections, and ensuring the PRA has the necessary data to carry

out its future policymaking responsibilities. In line with its strategy to run an efficient and modern regulator, in spring 2025 the PRA relaunched this initiative as Future Banking Data project. On 13 June 2025 AFB, in partnership with Deloitte, held a roundtable with the PRA to discuss how to streamline data collection and reduce the cost of regulatory reporting. The PRA's summary of the roundtable can be read [here](#).

- **Remuneration Reform:** This Working Group was formed after the publication of Consultation Paper [PRA 16/24](#) and [FCA 24/23](#) in November 2024 to inform [AFB's response](#), which was submitted in March 2025. In October 2025 the PRA and FCA published [PS21/25 - Remuneration Reform](#). Some of the recommendations made by the WG were adopted.
- **Review of FCA requirements following the introduction of the Consumer Duty:** One year after the implementation deadline of the New Consumer Duty, the FCA published a [Call for Input](#) on the Review of FCA requirements, which considered whether the Regulator could simplify its retail conduct rules and guidance via addressing potential areas of complexity, duplication, confusion, or over-prescription. The Working Group supported [AFB's response](#) to the CfI, which was submitted on 31 October 2024. In March 2025, the FCA published [FS25/2](#), setting out its plans for a review of FCA requirements.
- **Senior Managers & Certification Regime:** This Working Group was formed to consider the regulators' ([FCA/PRA DP1/23](#)) and HM Treasury's ([CfE](#)) review of the SM&CR. AFB responded to both the HMT CfE ([here](#)) and FCA/PRA DP1/23 ([here](#)). On 15 July, HM Treasury ([here](#)) as well as the PRA ([here](#)) and FCA ([here](#)), each launched consultations proposing legislative and regulatory changes to the SM&CR. The working group helped inform AFB's responses, which were submitted to HMT ([here](#)), the FCA ([here](#)) and the PRA ([here](#)) on 10 October 2025.
- **Solvent Exit Planning:** This Working Group was formed to feed into discussions on PRA [Policy Statement 5/24 – 'Solvent exit planning for non-systemic banks and building societies'](#) ahead of its 1 October 2025 implementation. On 20 November 2024 AFB held a roundtable with the PRA at Deloitte to discuss the PS (PRA slides [here](#)).
- **UK-EU Reset:** The WG was created to inform [AFB's response](#) to the House of Lords European Affairs Committee [Call for Evidence](#) on the UK-EU reset, which was submitted in March 2025. AFB will monitor developments on the topic as the UK looks to reset relations with the EU.
- **UK Immigration/Visa:** This Working Group discusses and provides feedback on proposals to change the UK Immigration/Visa system. It monitors the UK's approach to immigration, in particular following the publication of the Home Office's immigration white paper '[Restoring control over the immigration system](#)' on 12 May 2025. The working group are helping to inform AFB's response to the Home Office's latest consultation entitled [A Fairer Pathway to Settlement](#).

January 2026