



AFB TRAINING PROGRAMME SENIOR MANAGERS DEVELOPMENT PROGRAMME 2024

In partnership with

BCLP.

A LEARNING PROGRAMME DESIGNED FOR AFB MEMBERS

Following sold out programmes since its inception, **AFB has once again partnered with international law firm Bryan Cave Leighton Paisner (BCLP)** to deliver the Senior Managers Development Programme (SMDP) in 2024. This **bespoke eight-session development programme is** designed to highlight **the current key issues facing foreign banks operating in the UK** and provide **practical advice** on what members need to do to **ensure compliance** and **minimise their exposure**.

The course includes eight sessions, all held **in-person** at BCLP's offices over four mornings between March and May 2024. **The sessions can be attended by a single person, or if preferred, a member firm can send a different employee to each session, depending on who would benefit most from attending.** To support this, we have where possible, grouped sessions with a similar theme on the same day. The course will conclude with a **networking lunch** on 23 May where all attendees will have the opportunity to meet other delegates and BCLP speakers.

Who should attend?

The 2024 SMDP will focus on areas subject to regulatory change in the UK and follows a similar structure to previous programmes. This year's programme contains significant new content and will focus on the very latest developments in each area. This programme is targeted at attendees who have not attended this programme in the past, however given the amount of new content, some individuals who have attended previously may benefit from attending as a refresher and to ensure they have the very latest intelligence.

Following feedback from 2023, each session has been extended to ensure there is plenty of time for questions and discussion.

Each of the eight sessions will provide an overview of:

- Legal and/or regulatory issues
- Recent developments as well as what is on the horizon
- Regulatory expectations and requirements for authorised firms and their Senior Managers
- Practical tips to help member banks ensure compliance and minimise risks
- Relevant case studies which further explain the regulators expectations

Feedback from previous courses:

"Good content and very thought provoking"

"Much more detailed on litigation risk, which was useful"

"Insightful and well linked to examples"

"Very useful and pitched at the right level"

"Well presented with good content and a competent panel"

"Well presented and enough detail to initiate implementing into the bank"

"Enjoyed the practical application of the session and the usefulness of the advice provided by the presenters in real life work situations."

The structured sessions will take the form of presentations, facilitated group discussions and Q&A.

BCLP has extensive experience in working with Senior Managers, in particular helping proposed Senior Manager Function holders prepare for regulatory approval interviews, including situations where an application is contested by the regulator. For these matters, BCLP has worked closely with individuals to produce a tailored training programme, combining interactive learning sessions with mock interviews. This ensures an understanding of the regulatory landscape, the regulator's current priorities and Senior Managers' personal regulatory obligations the Senior Managers and Certification Regime. This approach has resulted in almost a 100% track record of applicants receiving FCA approval. BCLP will draw on this experience and practical approach to deliver this development programme.

Course Overview and Schedule of Dates

| Date | Module Themes | BCLP Subject Experts |
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| 21 Mar 2024 09:00-10:30 | Regulatory approach to foreign banks <ul style="list-style-type: none"> The FCA's and PRA's general approach to foreign banks operating in the UK, including the importance of corporate governance, the key elements of the authorisations document, prudential supervision, individual accountability and remuneration Direction of UK regulatory expectations and overview of hot topics, including: <ul style="list-style-type: none"> The impact of the implementation of the changes resulting from PRA Consultation Paper 20/23: Ring-fenced bodies: managing risks from third-country subsidiaries and branches Remuneration reform, including removal of the bonus cap requirements SM&CR (Senior Managers and Certification Regime) Reform | Daniel Csefalvay Matthew Baker Joseph Ninan |
| 21 Mar 2024 10:45-12:15 | Supervisory issues: Consumer Duty focus for wholesale banks <ul style="list-style-type: none"> Overview of the Consumer Duty Introduction to key supervisory issues applicable to foreign banks The practical implications of the Duty, including the requirement to: <ul style="list-style-type: none"> provide fair value and the right products and services for customers; and mitigate the risk of actual or foreseeable harm Actions banks should take to demonstrate how the Duty has been embedded and how to proactively manage risks of non-compliance Associated group litigation risks in the UK | David Scott Rhys Corbett Joanna Munro |
| 25 Apr 2024 09:00-10:30 | Diversity and inclusion (D&I), culture and conduct <ul style="list-style-type: none"> Why is culture and conduct a regulatory focus area? What are the current regulatory expectations of authorised firms? Non-financial misconduct – latest guidance D&I including data reporting requirement proposals from new consultation papers and the impact of using AI tools in specific context of D&I Ideas for getting ahead of the regulatory agenda | Polly James Catherine Turner Geraldine Scali |
| 25 Apr 2024 10:45-12:15 | A whistleblower framework for HR and Compliance <ul style="list-style-type: none"> Understanding the legal and regulatory protections for whistleblowers in the UK The need for close collaboration between HR and Compliance functions in dealing with whistleblowing reports Direct-to-regulator whistleblowing – from Covid lockdowns and beyond What does a whistleblower framework need to contain, and what does 'best in class' look like? | Polly James Catherine Turner Siân Cowan |

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| | <ul style="list-style-type: none"> • Future-proofing your whistleblowing framework for the regulators' non-financial misconduct agenda • A world beyond whistleblowing? How to embed a culture of 'psychological safety' at your firm | |
| 9 May 2024 09:00-10:30 | Operational resilience <ul style="list-style-type: none"> • The importance of operational resilience and the regulatory framework for assessing operational resilience and outsourcing for third country banks/branches within group structures (including risk mapping) • Managing specific risks around operational resilience (to include cyber risk, outsourcing and critical third parties) • Refresher on existing regulatory framework, including: key current requirements from a FS and DP perspective; the SMF24 (Chief Operations) role; Data Security; Network and Information Systems Regulations; and PRA/FCA and Information Commissioner's Office (ICO) approach to enforcement • Top tips / broader digital issues to be aware of | Daniel Csefalvay Geraldine Scali Lex Townsley |
| 9 May 2024 10:45-12:15 | Data governance issues and risks <ul style="list-style-type: none"> • Short update on international data transfer position (EU-US Data Privacy Framework, US-UK data bridge etc) • Overview of current AI regulatory framework (EU v UK) (draft EU AI Act, UK's AI Principles and international update following the November 2023 UK summit) • Data protection considerations when on-boarding new technology, particularly AI: engaging with technology from a data protection perspective • Enforcement trends in the UK (the UK regulator's approach to data breaches, statistics from 2023, regulatory fining trends) | Kate Brimsted David Rundle |
| 23 May 2024 09:00-10:30 | UK sanctions framework <ul style="list-style-type: none"> • Latest developments: <ul style="list-style-type: none"> - Implementation of the Economic Crime (Transparency & Enforcement) Act 2022 - Updates to ownership and control due diligence requirements - Licences - Politically Exposed Persons • Overlap between the regimes of the OFSI and FCA and recent enforcement actions and lessons learned • Compliance and risk prevention strategies • Ownership, accountabilities, and the importance of the senior manager function • Reminder of the cost of non-compliance • National Crime Agency's red notice on sanctions evasion priorities | Chris Bryant David Rundle Sonja Hainsworth |



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| 23 May 2024 10:45-12:15 | Financial crime and fraud risk management Senior Managers must be aware of and responsive to evolving financial crime risk, which remains top of the regulators' agenda. This session will cover: <ul style="list-style-type: none"> • The UK financial crime legal framework • The FCA's expectations for a financial crime risk framework • Latest trends in relation to financial crime issues • Developments in fraud: failure to prevent offence and the evolving nature of the so-called Quincecare duty following the UK Supreme Court decision in Philipp v Barclays Bank UK plc | David Rundle Andrew Tuson Tegan Schultz |
| 23 May 2024 12:15-13:30 | Networking lunch Open to attendees of all sessions, please join us and the subject experts from BCLP for a networking lunch. | |

ABOUT BCLP

BCLP's Financial Services Disputes and Investigations Practice:

BCLP is one of only a few law firms which house their contentious and non-contentious financial regulatory teams together alongside their financial services litigation, corporate crime and white-collar expertise. BCLP offer a team of dedicated lawyers who have extensive experience acting for financial institutions and members of their management who may have personal regulatory exposure.



Operating as one single team, the financial services disputes and investigations practice advises the full spectrum of financial institutions, including foreign banks operating in the UK. They support their financial institutions clients and provide pragmatic and commercially astute guidance to ensure they meet their vast global and local financial regulatory requirements. The team regularly assists clients in preparing for changes in regulations, ensuring that they are operating within the relevant legal framework, and that their staff are trained in and confident with the requirements and expectations imposed by regulators. At the other end of the spectrum, the team has extensive experience in dealing with high profile international regulatory enforcement investigations, complex financial services litigation and criminal prosecutions brought by regulators.

The team works closely and constructively with members of other complimentary practice areas, enabling it to 'issue spot' and provide multi-disciplinary advice to clients. The team combines this with an in-depth knowledge of the relevant regulators and how their authorisation, supervision and enforcement divisions operate in practice, together with technical excellence in the relevant law and regulations. Several of the team have gained direct experience from working at the regulators and law enforcement authorities (including the PRA and FCA) as well secondments to a range of financial institutions and investment exchanges.

FURTHER INFORMATION

For further information and to book your place please see [here](#) or contact: secretariat@foreignbanks.org.uk

PRICING

£1,950 plus VAT per bank, allowing one participant per session - participants can vary for each session.
Course limited to 30 places