

TRAINING – WHAT ORGANISATIONS SHOULD CONSIDER FOR BOTH HR AND EMPLOYEE TRAINING

HR AND SCMR PROJECT MANAGERS

Overview of Training Content:

1. Understand the regulatory expectations and obligations for firms and individuals under SMCR. This will include the governance map (now management responsibility maps), prescribed responsibilities, statement of responsibilities, conduct rules, fitness & propriety standards and assessment.
2. Determine how SMCR impacts the employment life cycle in order to recommend or effect change to related policies and procedures (e.g. Policies aligned to firm's culture, values and behaviours ranging from hiring and training through to performance management and exits).
3. Collaboration with stakeholders to effect change understanding responsibilities and boundaries for successful project management ie who leads and who does what!
4. Develop the appropriate HR systems, reporting processes and management information reports for the board and compliance purposes.
5. Establish and deliver a training plan which covers Senior Managers, Certified Persons and Employee Conduct Rule training. Further amend existing programmes from on-boarding and induction through to graduate and leadership training to reflect organisational culture and regulatory requirements. Be mindful of the regulatory requirements for NEDs and provide requisite training.
6. Launch Whistleblowing training aligned to regulatory requirements.
7. Be mindful of the impact of SMCR on own role and conduct.

Training Methods: Within City HR, these will include

- group workshops to understand the regulations and their impact on people management, compliance and employment law
- updates on the latest regulatory requirements – written and networking meetings
- City HR taskforce and networking meetings to address difficult issues – eg Performance Management in the new Regime; Regulatory References; How Might Fit and Proper be Assessed?
- a half day session to align the employment life cycle with the prevailing regulatory regime
- **Train the Trainer Overview to help HR and project managers deliver employee conduct rules training using customised materials (employee video, handouts and suggested content). City HR has a template and programme for adaptation within each firm.**

SENIOR MANAGERS

Overview of Training Content

1. Understand the regulatory expectations and obligations for firms and individuals under SMCR. This will include the governance map (now management responsibility maps), prescribed responsibilities, statement of responsibilities, conduct rules, fitness & propriety standards and assessment.
2. Obtain a broad understanding of all conduct rules and a deeper understanding of the practical application of the specific rules which are relevant for their work.
3. Understand what is considered 'taking reasonable steps'.
4. Equip Senior Managers with leadership behaviours and skills in order to lead and embed the firm's culture and standards and embrace a culture of individual accountability and openness (e.g. effective delegation and supervision).
5. Don't forget NEDs
6. Provide guidance on handovers when leaving or assuming a SM role.

Training Methods: Suggestions include:

- Senior Team Briefings, one-to-one mentoring sessions for Senior Managers with the Senior Executive, HR and Compliance/Legal
- Third party counselling (eg with an employment law firm) on what this means for the individual
- Conduct Rules Training (for which City HR has a template comprising video, case studies and slides with alignment to job role)
- Overview of the training being provided to employees as a safeguard to the Senior Manager and the policies in place to support the SMCR requirements
- Leadership and delegation skills underpinning the SMCR requirements and whistleblowing policy
- NED Briefing on personal impact and how the organisation is managing SMCR and whistleblowing

CERTIFIED PERSONS

Overview of Training Content

1. Understand the regulatory expectations and individual obligations under SMCR (e.g an overview of what this means for their managers in SM roles, the conduct rules, fitness & propriety standards and assessment).
2. Obtain a broad understanding of Individual conduct rules and a deeper understanding of the practical application of the specific rules which are relevant for their work.
3. Outline how the employment life cycle will be impacted ranging from interview assessments and on-boarding through to performance management and disciplinaries. Also provide an overview on Fitness & Propriety Certification, what breaches may mean in this regard and regulatory references.
4. Equip Certified Persons with training on behaviours and skills in order to embrace a culture of individual accountability and openness (e.g. effective delegation and supervision) as well as whistleblowing.

Training Methods: Suggestions include:

- Induction Programme or workshops introducing the new rules: what are the requirements of the Senior Managers Regime, what does this mean for my manager, the firm and me. Overview of conduct rules
- Assessment for Fitness and Propriety - what will this entail?
- Conduct training to incorporate the rules and standards of SMCR (for which City HR has a template comprising video, case studies and slides with alignment to job role)
- On-line training to test knowledge of the conduct rules
- Potential group workshop to embed the regime (including management, delegation and communication skills training for those who manage staff) and whistleblowing policy

EMPLOYEE CONDUCT RULES TRAINING

Overview of Training Content

1. Understand the regulatory expectations and individual obligations under SMCR (e.g an overview of what this means for their managers in SIMF/SIF roles, the conduct rules, fitness & propriety standards and assessment).
2. Obtain a broad understanding of Individual conduct rules and a deeper understanding of the practical application of the specific rules which are relevant for their work.
3. Embrace a culture of individual accountability and openness, including escalation of concerns and whistleblowing policy.
4. Understand the use of any selected on-line training portals.

Training Methods: Suggestions include:

- Induction Programme or workshops introducing the new rules: what does this mean for my manager, the firm and me. Overview of conduct rules
- Conduct training to incorporate the rules and standards of SMCR (for which City HR has a template comprising video, case studies and slides with alignment to job role)
- On-line training to test knowledge of the conduct rules
- Alignment of conduct rules to each individual's job role.



For further information on SMCR updates or training available from the City HR Association please contact us via andreaeccles@cityhr.co.uk