Training and Competence Regime

Compliance Framework | Global

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Replace all references to “the Company” with your organisation’s name.

Document Control

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Contents

1. Purpose

This Training and Competence Regime establishes the organisation-wide framework through which the Company ensures that every director, employee and contractor is trained and competent for the role they perform. A workforce that understands its legal obligations, the Company's policies and the risks inherent in its work is the most scalable control the Company operates: almost every obligation the Company holds — prudential, licensing, financial crime, data protection, safety and conduct — ultimately depends on people knowing what is required of them and being capable of doing it.

The regime defines the governance of training, the mandatory training required at induction and annually thereafter, role-based technical competence requirements, the tracking and escalation arrangements that ensure training is actually completed, and the evaluation, records and Board reporting that demonstrate the regime is working. It gives effect to the expectation in the BCBS Corporate Governance Principles for Banks that the Board, senior management and control functions maintain the collective knowledge and skills to run the Company safely; to the competence and awareness requirements of ISO 37301; to the ongoing employee training programme required by FATF Recommendation 18; to the security awareness requirements of ISO 27001:2022; and to the personnel-capability expectations of the BCBS Principles for Operational Resilience.

Competence is not treated as a training-completion statistic. The Company's position is that competence must be demonstrated, supervised until it is demonstrated, reassessed when roles change, and withdrawn — through restriction of activity or delegation — when it is found to be absent. This regime therefore sets requirements for assessment, supervision, development planning and consequence management as well as for course delivery.

This document is owned by the Chief Compliance Officer and approved by the Board of Directors. It is the parent framework for all training and competence requirements in the Company. Where a jurisdiction in which the Company operates imposes specific licensing, qualification or CPD standards on particular roles, those requirements are set out in the local licensing addendum for that jurisdiction and are not duplicated here; this regime governs everything those addenda do not.

2. Scope

This regime applies to all entities within the Company group, in every jurisdiction in which the Company operates, and to all people who perform work for the Company, including:

- permanent, fixed-term, part-time and casual employees;
- directors of the Company and of its subsidiaries, in respect of induction and continuing education;

- contractors, secondees, agency and labour-hire workers engaged for more than [X] business days;
- staff of material service providers, where the relevant outsourcing agreement requires completion of the Company's training because they support a critical operation or handle customer data;
- tied agents, introducers and distribution intermediaries acting for the Company, to the extent set out in their appointment agreements; and
- Accountable Executives and other persons subject to fitness and propriety assessment.

It covers all mandatory compliance training, induction and onboarding training, role-based technical training, professional qualification and CPD monitoring, and the governance, tracking, records and reporting that support them. It applies across all products, channels, brands, entities and locations, and to training delivered in any medium, including e-learning, classroom, on-the-job coaching, simulation and externally provided courses.

Exclusions: this regime does not set the qualification and CPD standards for Licensed Roles where those standards are prescribed by a specific regulator or professional body; those are governed by the local licensing addendum for the relevant jurisdiction. It does not govern general career development, tuition assistance or discretionary skills training, which are dealt with under the Human Resources Policy, except where such training has been designated as mandatory. Where a local addendum is silent on a matter, this regime applies. The local licensing addendum referred to throughout this regime is not part of this policy library: it is a separate document that the Company must produce and maintain for each jurisdiction in which it operates. Until an addendum exists for a jurisdiction, every requirement of this regime applies in that jurisdiction in full, and the Chief Compliance Officer must record the absence of the addendum as an open compliance gap and report it to the Board with the annual training plan.

Jurisdictional application: this document states international best practice and is drafted to be jurisdiction-neutral. The Company must map each requirement in this regime to the law and regulatory expectations of every jurisdiction in which it operates, record that mapping in the local licensing addendum and the Capability Frameworks, and keep it current. Where local law or a local regulator imposes a stricter, more specific or more frequent requirement — including on qualifications, minimum training hours, language of delivery, record retention periods or data residency for training records — local law prevails and must be implemented in addition to this regime.

3. Definitions

Term	Definition
Accountable Executive	A director or member of senior management to whom the Board or Chief Executive Officer has assigned named, documented individual accountability for a business line, function or material risk

	class of the Company, including any person registered, certified or designated under the senior manager accountability regime applicable in the Company's jurisdiction(s).
Awareness	A person's understanding of the Company's compliance obligations, the risks arising in their work and the consequences of failing to meet them, distinguished from the deeper skill and application required for Competence.
Capability Framework	The documented set of qualifications, knowledge, skills and behaviours required for a role family, against which recruitment, training, supervision and performance are assessed.
Competence	The demonstrated combination of knowledge, skills, experience and behaviours required to perform a role to the standard the Company, its customers and its regulators expect.
Consequence Management	The consistent and proportionate application of performance, remuneration, disciplinary and accountability outcomes where conduct, compliance or risk failures fall below the Company's standards, and of recognition where behaviour exemplifies them, consistent with the FSB Principles for Sound Compensation Practices.
Continuing Professional Development (CPD)	Structured learning undertaken to maintain and extend professional competence, measured in hours or points over a defined CPD year, whether required by an external licensing body, a professional association or the Company.
Control Function	A function that is independent of the business units and revenue-generating activities it oversees and whose primary role is risk management, compliance, internal audit, financial control or actuarial control, together with any other function the Board designates as a control function.
Induction Training	The mandatory training assigned to a new starter, contractor or internal transferee that must be completed before, or within defined deadlines after, commencing in a role.
Learning Management System (LMS)	The system of record used to assign, deliver, assess and track all mandatory

	and role-based training and to hold training completion records.
Licensed Role	A role that may only be performed by a person holding a licence, registration, accreditation or minimum qualification required by applicable law in the Company's operating jurisdiction(s), or on whose knowledge and experience an authorisation of the Company depends.
Mandatory Training	Training a person must complete as a condition of performing their role, comprising induction modules, the annual compliance training curriculum and any role-specific regulatory modules assigned under a Capability Framework.
Pass Threshold	The minimum assessment score, set at [X] % unless a higher threshold is specified for a module, that a person must achieve for a module to be recorded as complete.
People Team	The human resources and learning function of the Company responsible for delivering induction, administering the LMS and maintaining training records.
Refresher Training	Periodic repeat training on a mandatory topic, delivered at the frequency set in the annual mandatory training curriculum.
Regulated Activity	Any activity that the Company may perform only under an authorisation, licence or registration, or that is subject to specific conduct, prudential or financial crime obligations, including customer onboarding, payment processing, lending and credit assistance, advice, and handling personal data at scale.
Role-Based Training	Technical and regulatory training assigned to a person because of the specific activities of their role, in addition to all-staff Mandatory Training.
Supervision Period	The defined period during which a person may perform a Regulated Activity only under documented review of their work by a competent supervisor, applied until competence is assessed as demonstrated.
Training Needs Analysis	The annual assessment, led by the Chief Compliance Officer with the People Team, of the training the Company requires having regard to its obligations, risk profile, incidents, audit findings and strategy.
Training Register	The consolidated record, maintained in or

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.