

Assessment Plan - Financial Services Compliance/Risk Officer

SUMMARY

This Assessment Plan covers the Compliance / Risk Officer apprenticeship that has been developed by the employers with input from the participating Professional Bodies and several Training Providers.

Our approach is 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. In support of 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 an 18 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
0	Understand job role and apprenticeship commitment	Deliver induction training and understand role in apprenticeship	Explain apprenticeship, roles, timetable and commitments. Completes SFA admin req'ts		
1-12	Works to role objectives / KPIs / training plan Develops Knowledge, Skills, Behaviours	Manages as any other employee inc Performance Management via monthly 1to1s etc Supports and coaches	Monitors progress; identifies gaps; delivers apprentice learning and support as required. Completes SFA admin req'ts Supports and trains	Provides qualification content / support	
3-12	Studies and takes qualification			Provides qualification exam and results	
13-14	Continues building required Knowledge, Skills, Behaviours	'Gateway' to end point assessment: Employer and TP review progress and agree whether Apprentice has achieved competency levels required vs the standard			
14-15	Apprentice, Employer and TP work together to agree the make up of the 2 elements of End Point Assessment (Portfolio and Professional Discussion). TP signs off vs Assessment Plan requirements				
16-17	Completes Portfolio. Submits for assessment. Prepares for Professional Discussion and Interview	Reviews Portfolio. Supports preparation for Professional Discussion and Interview	Supports completion of Portfolio, reviews and submits for assessment. Supports preparation for Professional Discussion and Interview		Assesses Portfolio. Prepares for Professional Discussion and Interview
18	Takes part in Professional Discussion and Interview	Informs apprentice of result.	Completes SFA admin requirements		Conducts Professional Discussion and Interview. Decides grade.

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

- **International Compliance Association** - Cert in Anti Money Laundering; Cert in Compliance; Cert in Financial Crime Prevention; Specialist Cert in Money Laundering Risk; Specialist Cert in Trade Based Money Laundering; Specialist Cert in Corporate Governance; Specialist Cert in Managing Sanctions Risk; Specialist Certificate in Conduct Risk; Advanced Cert in Compliance.
- **Chartered Institute of Securities & Investment** – Combating Financial Crime; Global Financial Compliance; Risk in Financial Services; Managing Cyber Security
- **London Institute of Banking & Finance** – UK Financial Regulation; Financial Services, Regulation and Ethics; Certificate in Retail Banking Conduct of Business; Certificate in Business Banking and Conduct; Cert in Regulated Complaints Handling; Award in Customer Complaints Handling
- **Chartered Banker Institute** – Cert in Complaint Handling
- **Chartered Insurance Institute** – Certificate in Financial Services, Certificate in Insurance
- **Chartered Institute of Credit Management** – Diploma in Credit Management; CSA Diploma, Working in Debt Collection
- **Institute of Risk Management** – International Certificate 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 Insurance Institute** – UK Financial Services, Regulation and Ethics ; Financial Services, Regulation and Ethics; Award in Retail Banking

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.

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 2 components which are described in more detail in the next section:

- A Portfolio of Evidence created through the apprenticeship which contains a range of types of evidence demonstrating that the apprentice has met the requirements of the Standard, supported by a Professional Discussion.
- A structured Interview that focuses on the skills and behaviours of the Standard, testing the competence of the apprentice in the softer aspects of the role.

Assessment Method	Area Assessed	Assessed by	Grading	Indicative Weighting
Portfolio of Evidence	Whole standard	Independent Assessment Organisation	Fail / Pass / Distinction	50%
Professional Discussion	Whole standard	Independent Assessment Organisation		
Interview	Primarily Skills and Behaviours	Independent Assessment Organisation	Fail / Pass / Distinction	50%

END POINT ASSESSMENT

1. What is being assessed

The Detailed 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. 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 demonstrate the application of knowledge and competence in the work environment. It will also draw on any learning record created by the apprentice.

The types of evidence may include written work, small projects, performance review information, workplace observations, case studies, learning record entries, development plan content, emails, customer comments etc. There are likely to be several types of evidence within a Portfolio, designed so that they collectively demonstrate that the apprentice has learned and synoptically applied the knowledge, skills and behaviours of the Standard. The Portfolio will cover the majority of the standard. 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 with the support of their training provider where appropriate using an assessment template that will be contained within the Assessment Tools. 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 a fully independent assessment, in combination with the Professional Discussion.

The Professional Discussion will be a relatively unstructured discussion between the Independent Assessor and the apprentice where the Assessor clarifies, and if necessary delves deeper into, what has been submitted in the Portfolio, the work that the apprentice has done and how the evidence has been produced. The focus will be to ensure that the apprentice genuinely understands / has demonstrated the knowledge, skills and behaviours for which they have submitted evidence. It will enable the Assessor to make a robust assessment of the apprentice against the assessment criteria and will score the Portfolio and Professional Discussion accordingly. It is expected to last around 30 minutes and more detailed guidance will be provided in the assessment tools which will be developed by assessment organisations.

2.2. Interview

The Interview will have a well defined structure, and be distinctly different from the format of the Professional Discussion, enabling the Independent Assessor to explore, on a consistent basis, those areas of the standard that are more difficult to evidence in a Portfolio – particularly the skills and behaviours. This may include communicating, influencing, teamwork, some aspects of problem solving, flexibility, resilience for example. The Assessor will be provided with a bank of questions / mini role plays / scenarios from which they can select the most appropriate for the apprentice to establish the level of competence in these skills and behaviours. This will enable them to make a robust assessment of how well the apprentice meets the assessment criteria and score the Interview appropriately. A full brief for the Interview, together with the bank of questions etc will be provided in the assessment tools which will be developed by the independent assessment organisation. This will ensure that consistent approaches are taken and that all key areas are appropriately explored. The Interview is expected to last between 30 and 45 minutes. A more accurate length will be provided in the assessment tools.

The Professional Discussion and the Interview may be carried out face to face, or remotely using e.g. video conference or Skype, depending on numbers and locations of apprentices.

The combination of Portfolio / Professional Discussion and Interview 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 Assessor to make an holistic judgement about how well the apprentice meets or exceeds the Standard.

2. 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 Assessment Organisation’s Assessor. Their respective roles are as follows:

Assessor	Role
Employer	<ul style="list-style-type: none"> • 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 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	<ul style="list-style-type: none"> • 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 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 Assessment Organisation’s Assessor	<ul style="list-style-type: none"> • Brings a completely independent view to the end point assessment as they have had no engagement with the apprentice until now • Reviews the Portfolio independently, conducts the Professional Discussion and scores against the assessment criteria • Conducts the Interview and scores against the assessment criteria • 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.

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 recommend 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.
- 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 the Independent Assessment Organisation. Their Assessor will make a synoptic assessment of each apprentice's work, including the grade to be awarded, on the basis of evidence supplied in the Portfolio / Professional Discussion and the 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 assessors that meet the requirements set out by the Employers
- Trains and certifies all individual 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 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 are capable of using 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.

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 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 4 of the Skills and Behaviours – Delivering Services, Analysis and Problem Solving, Communicating and Influencing, Resilience. They must achieve a Pass in all other areas of the standard. The apprentice who achieves a Distinction 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 Assessment Organisation 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 75 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.

Appendix 1 – Detailed Standard

Compliance / Risk Officer

Knowledge	What is required	Learning Outcomes
Risk and Compliance Framework	Broad understanding of the Financial Services legal and regulatory framework, the role of the different regulators (if appropriate), the implications of non-compliance for the organisation.	Broad understanding of the Financial Services legal and regulatory framework, (including the role of the different regulators if appropriate)
		Understands the implications of non-compliance for the organisation
Risk and Compliance policies / procedures	Sound understanding of the specific 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 Financial Conduct Authority (FCA) Handbook and the policies/procedures used by the organisation to implement these requirements.	Sound understanding of the specific risk/compliance requirements for their role
		Sound understanding of the actual legal/regulatory requirements for their role
		Sound understanding of the policies/procedures used by the organisation to implement these requirements
Industry and company understanding	Understands the role their organisation plays in Financial Services, the business they work in, the products and services offered to customers, the organisation's approach to delivering fair customer outcomes, its 'Values', professional standards, and where their role fits in the business. Understands the function of the different areas of the organisation they need to work with in their role. Basic understanding of the impact the external environment has on Financial Services and relevant best practice.	Understands the role their organisation plays in Financial Services
		Understands the business they work in, its 'Values', professional standards, and where their role fits in the business
		Understands the products and services offered to customers, and their organisation's approach to delivering fair customer outcomes
		Understands the function of the different areas of the organisation they need to work with in their role
		Basic understanding of the impact the external environment has on Financial Services and relevant best practice.
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

Skills	What is required	Learning Outcomes
Delivering Services	Uses a wide range of company systems and processes to deliver services to customers/colleagues. This may include advice to customers/colleagues based on regulatory requirements and organisation policies; working with suppliers on data security; internal reviews / audits and follow up; ensuring accurate records e.g. approved persons; supporting formal committees. Proactively meets challenging individual and team performance measures in line with company policy, Values, standards and regulatory requirements. Plans and organises their work, focusing on priorities, to meet commitments / KPIs, including regulator deadlines. Escalates when required.	Can apply a wide range of company systems and processes to deliver services to customers/colleagues
		Proactively meets challenging individual and team performance measures in line with company policy, Values, standards and regulatory requirements
		Plans and organises their work, focusing on priorities, to meet commitments / KPIs, including regulator deadlines.
		Can escalate issues when required to achieve resolution.

Analysis and Problem solving	Analyses relatively straightforward risk/compliance problems, investigating issues e.g. fraudulent transactions, and recommending solutions. Works with data, analysing and producing required reports / management information for internal and/or external e.g. FCA use. Able to read and interpret reports, summarising required information.	Analyses relatively straightforward risk/compliance problems, investigating issues and recommending solutions
		Works with data, analysing and producing required reports / management information for internal and/or external use
		Able to read and interpret reports, summarising required information.
Communicating & Influencing	Writes clear and concise reports / recommendations in a way that is meaningful to the recipient. Deals effectively with customers/colleagues, using sound interpersonal skills and communicating well through a range of media using appropriate language e.g. phone, face to face, email. Listens actively to understand needs and adapts their style to the recipient. Influences others to ensure compliance/risk requirements are met, when appropriate.	Writes clear and concise reports / recommendations in a way that is meaningful to the recipient
		Deals effectively with customers/colleagues, using sound interpersonal skills and communicating well through a range of media using appropriate language
		Listens actively to understand needs and adapts their style to the recipient.
		Influences others to ensure compliance/risk requirements are met, when appropriate.
Teamwork	Builds/maintains strong working relationships with customers/colleagues/suppliers as appropriate. Consistently supports colleagues at all levels and collaborates to achieve results. Aware of own role in the team and impact on others.	Builds/maintains strong working relationships with customers/colleagues/suppliers as appropriate
		Consistently supports colleagues at all levels and collaborates to achieve results
		Is aware of own role in the team and impact on others.
Continuous improvement	Identifies opportunities to improve performance and service delivered. Takes ownership of specific changes that impact their role.	Identifies opportunities to improve performance and service delivered
		Takes ownership of specific changes that impact their role
Personal Development	Keeps up to date with relevant legal/regulatory changes. Seeks feedback and acts on it to improve their performance. Builds their own capability through ownership of their own development, working with their manager.	Keeps up to date with relevant legal/regulatory changes
		Seeks feedback and acts on it to improve their performance
		Builds their own capability through ownership of their own development, working with their manager.

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.	Demonstrates integrity and ethical behaviour in the way they do their job
		Treats sensitive information in a confidential way
Flexibility	Adapts positively to changing work priorities and patterns when new tasks need to be done or 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.	Displays energy and enthusiasm, staying positive when under pressure
		Deals objectively with setbacks when they occur, learning for the future
		Supports others when setbacks occur, sharing learning with others