



TRAINING SERVICES

Training Prospectus

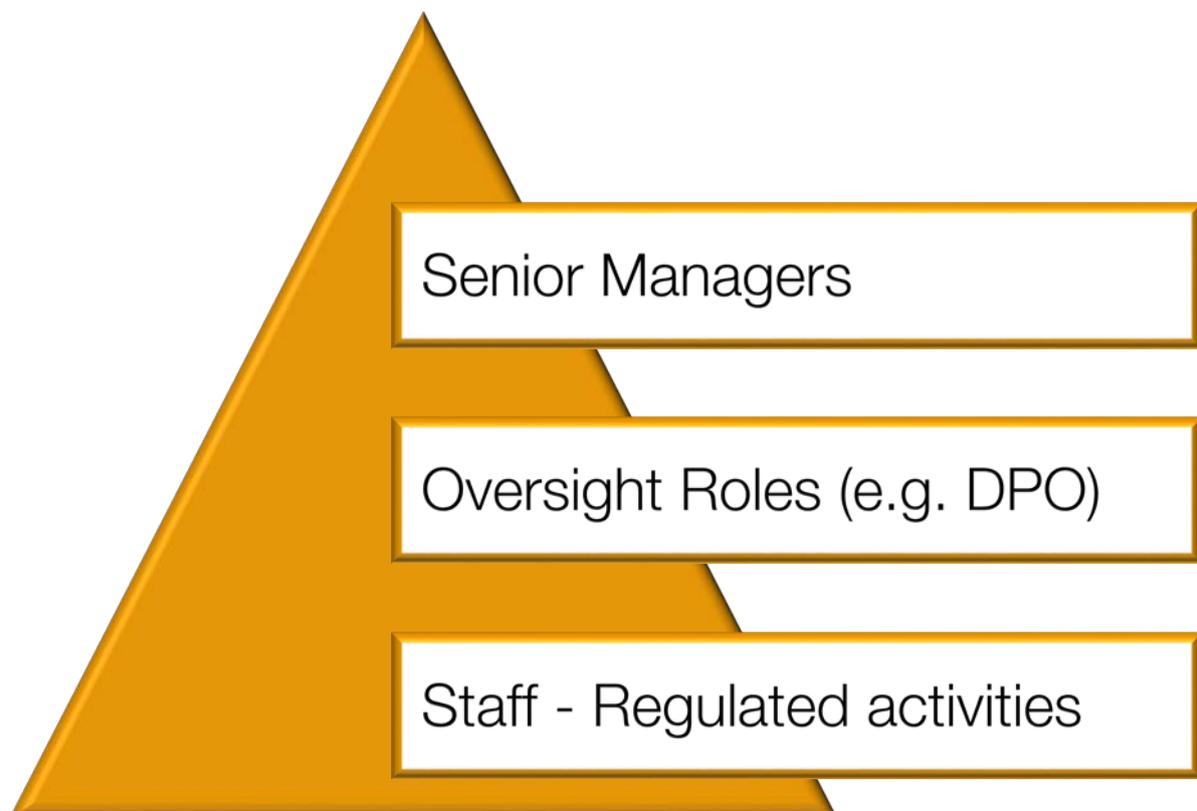
May 2018

DEMSA TRAINING

Our Focus

Training & Competence services focused on different role profiles

-  Senior Managers as set out in SM & CR
-  Compliance Oversight & Compliance support roles
-  Client facing staff/learners under Conduct Rules

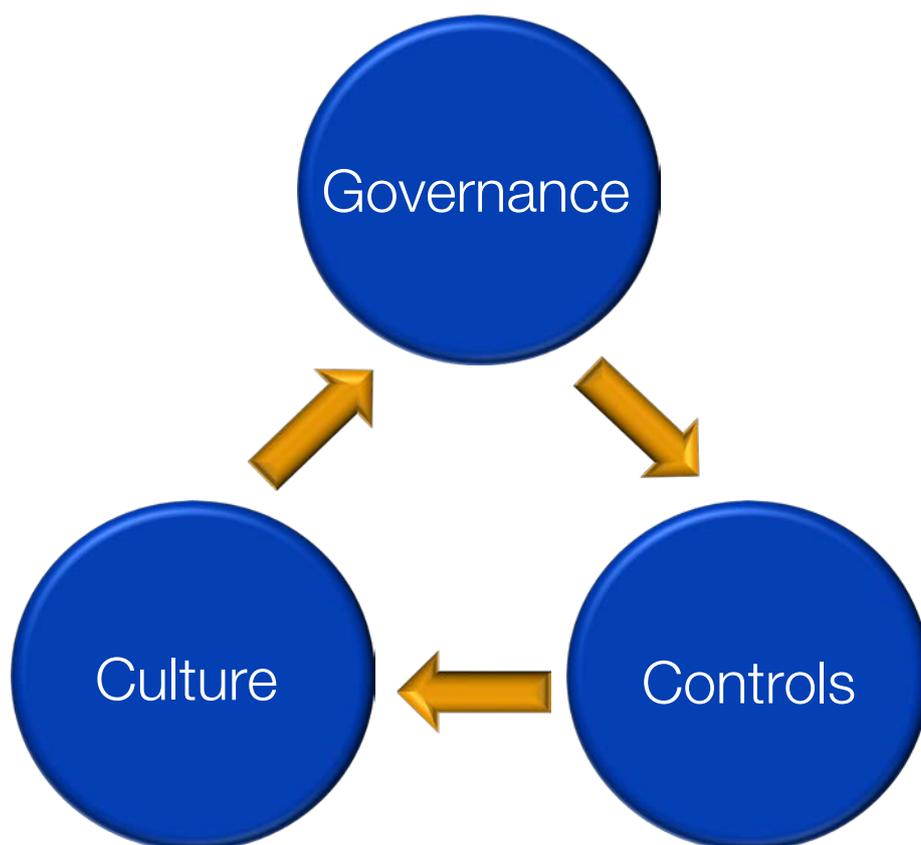


DEMSEA TRAINING

Cornerstones of Good Practice

In assessing the culture of a firm, the FCA will not only talk to senior managers, but also, importantly, to middle and junior managers and front line staff.

This is to consider whether behaviours and actions 'on the shop floor' are consistent with the values expressed by senior management.



DEMSEA TRAINING

CPD Table – What qualifies as CPD

Training	
Activity	CPD Hours
Participating in, writing or delivery of formal training:	
Full day	4.5
Half Day	2
Less than half day	1
Distance/ E-Learning	2
Participating in, writing or delivery of informal training	2
Meetings/ Discussion	
Activity	CPD Hours
Conference per day	4.5
Online forums	1
Attendance of specialist meetings or committees, such as money advice groups, MALG etc.	2
Webinars	1
Qualifications	
Activity	CPD Hours
NTI PIP Qualification	
Professional qualifications; Degree, Certificate, Diploma (examination must be taken to claim time for study and exam)	Actual time spent in study and examination may be claimed
Work towards the achievement of an NVQ in related area	Actual time spent building portfolio of evidence and/or attending lectures, workshops etc. may be claimed
Research, Reading/ Writing- Reading may only total one 8 th of your total hours	
Activity	CPD Hours
Journals and industry publications	1
Research of social policy activity including production of written document	2
Writing articles for journals or industry publications	2

DEMSA LMS

Virtual training & competence

Include the following core professional services:

1. DEMSA CPD Academy as a core learning management system (LMS)
2. Access to training & compliance support and human resources
3. A range of training content that can be certified
4. Training of policies to ensure adoption and testing of staff understanding
5. Key training modules for Senior Managers and Compliance oversight functions delivered face-to-face and on-line
6. Training plans and key modules based on roles & responsibilities administered by your 'oversight' functions
7. CPD programme with DEMSA certificates. To include webinars for periodic content updates
8. MI built-in and the ability for external 'views' for auditors and regulators

DEMSA LMS

LMS core content

Include the following core professional services:

1. Key policies aligned to the FCA regime and Data Protection & GDPR requirements
2. Support tools for FCA supervision & periodic reporting
3. On-line training courses for different roles & responsibilities, for example:
 - Senior Manager training in respect of SM & CR
 - TCF in practice for management responsible for systems and controls
 - Risk assessment for compliance oversight function
 - Data Protection/GDPR for telephone debt advisers
 - Complaint handling for client facing staff
 - Dealing with vulnerability in the workplace
4. Courses can be broken down into modules with supporting documentation
5. Repository of training records & certificates, including qualifying CPD (Hours)
6. Repository of training content and supporting documentation to allow course development and updates (e.g. for new legislation, emerging best practices)

DEMSA LMS

Training content examples

Executive

- SM & CR
- FCA application/supervision
 - Firm
 - Individuals
- Risk Management Framework/ Conduct risk
- Corporate governance, culture, business strategy & effective controls

Controlled Functions

- Compliance oversight for DMCs
- TCF in practice [conduct risk framework]
- Protecting client money [CASS 11]
- Risk assessment by controlled function
- Financial promotions & remuneration
- Data Protection/GDPR - incidents & data breaches
- Assessing the suitability of regulated advice
- Complaint Handling (DISP)
- PERG, Introducers & Appointed Representatives (Ars)

Staff

- The regulatory framework you operate in
- Data Protection/GDPR - how the principles apply
- Complaint Handling & the role of FOS
- Dealing with vulnerable clients
- Regulated debt advice on the phone
- Debt advice events and reviews
- Introduction to insolvency services by legal jurisdiction
- TCF in practice
- The Consumer Credit Sourcebook [CONC 8]
- Debt Adviser's guide to interpreting and communicating a client's credit report
- Case reviews
- Dealing with priority creditors
- Dealing with legal cases & the courts

DEMOSA LMS

The online training platform

Access to the DEMOSA online Training Platform is dependent on membership type and company size.

All fees and costs associated are listed in the fees section of the brochure.

The DEMOSA Training Platform gives you access to the following information:

- DEMOSA webinars
- DEMOSA Bulletins
- Useful Information & Documents
- DEMOSA Policies & Procedures
- DEMOSA & Regulatory news
- E-Learning courses
- Reference courses from face-to-face events
- E-Learning, Face-to-face and webinar training certificates.

DEMSEA LMS

Online training

The DEMSEA Training Platform will save your completed training in archive for you to reference at any time and you will be allocated CPD hours for each piece of training content/course that you complete.

The following courses are currently available on the platform:

- Application Process
- Approved Persons
- TCF- Treating Customers Fairly
- CONC 1 & CONC 2
- Dealing with Vulnerable Clients
- Complaint Handling
- Risk Management
- Financial Crime
- Quality Assurance Framework
- Introduction to the FCA- FCA Learning material

When you complete any face-to-face courses hosted by DEMSEA or in conjunction with DEMSEA, this training reference material will be allocated to your personal training account for you to certify, this will then allocate the CPD hours to your account that you have attended. You will also be allocated certificates for DEMSEA webinars and DEMSEA member events such as the annual conference, compliance and creditor liaison forums.



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SM & CR

Each senior manager in scope of the SM & CR must also have an agreed Statement of Responsibility which clearly sets out the areas of the business for which they are accountable.

Training Agenda:

Introduction

The FCA approve and hold to account the most senior individuals whose decisions and personal conduct have a significant effect on the conduct of your firm

Transition from Approved Persons to Senior Manager Regime in 2018

- CP17/25 'the what' and 'the why' - Closed 4/11/2017
- CP17/20 – Staff incentives, remuneration and performance management in consumer credit- Closed 4/10/2017
- CP17/40 – Transition from Approved Persons – Closed 21/2/2018

Transition from Approved Persons to Senior Management regime in 2018

Conduct Requirements



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Introduction to GDPR for frontline staff

Training Agenda

- What is actually happening on 25th May 2018
- The Data Protection Act – A quick recap
- How does this affect you as an employee and as a consumer in your own right?
- Looking at this from a customer's perspective:
 - New privacy notices and updated Terms of Business
 - DP checks and engagement with customers generally
 - Subject Access Requests and role of DPO
 - Our legitimate interests
 - Creditor liaison activities and transferring data to third parties (e.g. an IP)
- The countdown to 25 May 2018
- Next steps

Workshop Logistics

1. Workshop training style and cross-referencing with Approved Persons/SM & CR
 - Four hours in total with morning breaks and light lunch
2. Supporting handouts
3. Relevant examples throughout
4. Plenty of opportunities for questions, including interactive sessions
5. CPD
6. Training recorded on DEMSEA CPD Academy
7. Full member, Affiliate member and non-member rates available
8. Free places for members hosting the training



DEMSA COURSES

Debt Advice events & Suitability statements

Training Objectives:

Debt Advice Requirements

- FCA mission statement, 'Approach to Consumers' and 'Approach to Supervision'
- Operational Challenges
- The vulnerability and financial capability agenda
- Impact of the FCA "Dear CEO" letter in December 2016
- Focus on advised reviews
- Debt Advice requirements
- QA challenges

Advice in a durable medium

- Making recommendations
- Personalised advice letters
- Covering all bases- suitable and unsuitable
- Financial statement and impact of SFS

Workshop

- Finding the right balance

Key Objectives

- Familiarity with Consumer Credit Sourcebook (CONC)
- Matching policies to work practices
- Embedding QA
- Making recommendations
- Personalising advice letters
- Strategies for non-engagers



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Dealing with annual reviews & Changes in circumstance

Training Objectives:

- Understand the FCA objectives from the “Dear CEO” letter of 8 December 2016
- Requirements of CONC 8.3 (debt advice)
- Requirements of CONC 8.5 (financial statements)
- Requirements of CONC 8.8 (reviews)
- Debt advice in durable medium
- Pro-active monitoring for change
- Dealing with foreseeable events
- Introduce support notes and links

Training approach:

- Practical examples
- Dealing with more complex cases (e.g. Joint DMPs)
- Alignment of policy with day-to-day working practices
- Record keeping requirements
- Focus on client journey and involvement of third parties

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Dealing with Vulnerability

Training Objectives:

- FCA position on vulnerability
- CONC provisions- all consumer credit firms
- CONC provisions- all client facing staff
- Draw a parallel with the Mortgage lending and Energy sectors
- Alignment to TCF objectives
- Good practice guidance
- Introduce support notes and links

The FCA has confirmed that defining vulnerability can be very difficult. Vulnerability can take different forms which can be obvious or hidden, permanent or temporary. Individual consumers may accept and acknowledge or disagree and not recognise that they are experiencing vulnerability.

The FCA previously defined 'vulnerable' consumers as those who are especially susceptible to harm because of their circumstances. Vulnerability is also often related to the individual's particular context or circumstances when using financial services. Although identifying vulnerable consumers will never be an easy or prescriptive process, the FCA has built on their initial definition on vulnerability to provide more clarity. They do not believe that this is imposing new expectations on member firms, or a change of direction from the encouraging progress they have seen in this area. Instead, the FCA updated its position in 2017 to ensure they can respond in a more *nuanced* way that enables them to adapt their regulatory supervision to changing conditions. They have stated that it will enable them to include more transient or intermittent types of vulnerability.

The FCA definition of vulnerable consumers are:

1. people who can readily be identified as significantly less able to engage with the market, and/or
2. people who would suffer disproportionately if things go wrong

DEMSA COURSES

TCF – Treating Customers Fairly

Course Overview:

- Explain what is meant by ‘principles-based regulation’
- Review the 6 required consumer outcomes
- Developing TCF objectives statement
- Review the methods your firm could use in order to assess its practices against TCF principles
- TCF action planning in your own firm
- Answer your questions

Course Objectives:

- Distinguish between examples of good and poor practice in relation to:
 - The culture of the business
 - The availability and use of management information within the firm
 - Product design, including the role of all parties within the product lifecycle
 - Financial Promotions and disclosure of information at different points in the product lifecycle, notably at point-of-sale and customer reviews
 - The quality and method of delivery of sales and regulated advice provided to customers (e.g. Face-to-face, over the phone, on-line)
- Handling client feedback and complaints



DEMOSA COURSES

Risk Management

Developed and run by Kevin Still, Director of DEMOSA and aimed at Governing Functions and Senior Management.

The UK Corporate Governance Code (the code) states that:

“The board is responsible for determining the nature and extent of the significant risks it is willing to take in achieving its strategic objectives. The board should maintain sound risk management and internal control systems”

Training Objectives:

1. Understand FCA position on Risk Management
2. Looking at taking a strategic perspective
3. Your approach to Risk Management
4. Categorising risk
5. Looking at Conduct Risk
6. Tackling Financial Crime
7. Dealing with Conflicts of Interest

DEMSA COURSES

Financial Crime

“Firms must comply with requirements for establishing, implementing and maintaining adequate policies and procedures for countering the risk that they might be used to further financial crime”

Training Objectives:

1. Understand FCA position on Financial Crime and Money Laundering Regulations (MLRs)
2. Understand member obligations around countering Financial Crime
3. Assess whether you need an MLRO and CF11?
4. Assess what Systems and Controls are required
5. Assist with preparatory work
6. Training and workshop support

Financial Crime (Source: FCA)

All consumer credit firms must comply with legal and regulatory obligations to deter and detect financial crime. This includes money laundering. We will require all consumer credit firms to establish and maintain appropriate and risk-sensitive policies and procedures to reduce the risk that they may be used to further financial crime.³

In addition, most consumer credit firms that are subject to the Money Laundering Regulations will also have to comply with our anti-money laundering provisions.⁴ Our rules require to identify, assess and mitigate the risk of money laundering in their business. They also require firms to appoint a money laundering reporting officer and allocate overall responsibility to establish and maintain effective anti-money laundering systems and controls to a senior manager.

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Quality Assurance Framework

Effective Quality Assurance monitoring and the provision of Management Information (MI) to deliver fair outcomes to customers and consumers engaging with your firm.

Training Objectives:

How to deliver effective Quality Assurance monitoring and the provision of MI to deliver fair outcomes to your customers.

1. Understanding the terminology & underlying principles
2. Understand what the FCA are looking for
3. Understanding what 'good' looks like in your firm
4. Look at quality management systems & procedures
5. Answer your questions
6. Access to reference material and useful links

“I personally thought that the training was very good and it was good to receive training from an external source who has experience of going through the same things as we currently are. I found the training and in particular the trainer very knowledgeable and very specific to its content.

The authorisation process can feel very daunting but the way that this was delivered was very focused and helped us to digest its content and the importance of the regulators.”

DEMSEA Member testimonial



DEMSA COURSES

Escalated complaint handling

Training Objectives:

1. Know the FCA's and Ombudsman's statutory objectives
2. Know the FCA's requirements for treating complainants fairly
3. 'Empowering' you in the early resolution stages
4. Spotting serious cases at the earliest opportunity
5. Understand the process into formal complaint handling
6. Understand the role of the Financial Ombudsman
7. Answer your questions

Course Outline

Overview

- Course objectives
- What to expect from the FCA- 'root cause' analysis
- Principles-based regulation
- The 6 required outcomes of TCF
- The sixth TCF outcome

Complaint Handling in perspective

- Complaint Handling in practice
- Examples of good and bad practices
- Handling client feedback and complaints

Summary



DEMSEA COURSES

Dealing with third party complaints

Developed and run by Kevin Still, Director of DEMSEA.
Available face-to-face and webinar.

The Dispute Resolution forum (DISP) rules require that, as an FCA regulated firm, you establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints (DISP 1.3.1).

Training Objectives:

1. Is there a Subject Access Request (SAR) involved?
2. Know the FCA's and Ombudsman's statutory objectives
3. Know the FCA's requirements for treating complainants fairly
4. 'Empowering' you in the earlier engagement and resolution stages
5. Spotting serious cases at the earliest opportunity
6. Understand the process into formal complaint handling
7. Understand the role of the Financial Ombudsman
8. Answer your questions

DEMSA COURSES

Interpreting a credit report

Training Agenda

Overview

- Background on Credit Reference Agencies (CRA's) and reporting obligations of lenders
- How can the credit report be used in the debt advice process?
- How can the credit report add value to the debt solution lifecycle?
- How can embedding the use of credit reports assist FCA compliance
- What is a credit report and what does it contain?
- Ordering a credit report as a consumer and obtaining customer consent to use it
- Interpreting the report at a debt advice and account management level

TCF & Financial Crime implications

- Money laundering, identity & suitability checks
- **Know your customer (KYC)**
- Rehabilitation including positive profiles on priority agreements
- Monitoring creditor reporting

DEMOSA INFORMATION

Booking information

For more information regarding booking DEMOSA face-to-face training, the online training platform and webinars.

Email us

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Write to us:

DEMOSA - Debt Managers Standards Association

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