



Consumer Duty - the buck stops with you not just your processes.

Worksmart's last article in T-CNews' October's edition, Julie Pardy talked about the value of firms revisiting and updating their existing people related regulatory processes, e.g. SM&CR and Training & Competence, to enable them to evidence that they are complying with Consumer Duty (CD). It still makes sense that firms focus on these things. However, in this article we wanted to look at CD from another perspective, namely that of the individual. The reason we talk about this from an individual's perspective is because, to date, the focus has been on firms and their policies, practices and processes, e.g. product design, product governance, sales processes, distribution strategies, etc.

Once live, however, responsibility will come down to individuals, most specifically the senior managers, certified individuals and particularly the NED who has been identified as being the 'CD Champion'. Through observing many regulatory change programmes over the years, it's noticeable how much time and resource within projects are focused on the product/process changes, with less time spent on the impact to individuals and the way in which they deliver against the requirements of their roles.

Find out more in T-CNews' January edition, click **here** to read the full article.

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BLOG SERIES: What will it take to deliver Consumer Duty

With all the current focus on preparing for CD, it is easy to forget its origins, and so the FCA's underlying aspirations for this regulation. To do this, people need to look back to the financial crash of 2008. After a year-long review into what went wrong and the subsequent publication of the "Changing Banking for Good" report, it was quickly accepted that the widespread evidence of wrongdoing meant fundamental change was needed. So, when SM&CR was introduced in 2016 not only did it deliver clear accountability at a senior level it also carried high aspirations of industry-wide culture change.....

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