

Chartered Banker

Professional Standards Board

Professional Conduct

Customer

Independent customer-focussed Advisory Panel

Trust

Leadership Standard for Professional Bankers

Customer

Professional Conduct

Independent customer-focussed Advisory Panel

Trust

Leadership Standard for Professional Bankers

Professionalising Banking

Foundation Standard for Professional Bankers

Professional Standards are designed to be customer-focussed and align with current industry best practice

Pride

Banking Standards

Standards

Professional Expertise

Progress Report 2015

Professional Standards are designed to be customer-focussed and align with current industry best practice

Banking Standards

Professional Expertise

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CB:PSB Board Members

Lady Susan Rice CBE
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Managing Director, Commercial
and Private Banking
Royal Bank of Scotland

Mark Burton
Managing Director, Global Head of
Learning, Leadership and Talent
Barclays PLC

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Chair, Advisory Panel,
Special Adviser, Association of
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(ACCA) and Professor of Accounting,
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Santander UK

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Virgin Money

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Europe and Global Head
Wholesale Credit and Market Risk
HSBC Bank plc

Robin Somerville
Independent Board Member

Simon Thompson
Chair, Professional Standards
Committee and Chief Executive
Chartered Banker Institute

Steve Townsend
Insurance and Market
Risk Director
Tesco Bank

Member Firms



Chairman's welcome

LADY SUSAN RICE CBE



Over 185,000 bankers achieved the Foundation Standard in 2014 – 117,716 in the UK and an additional 69,600 globally. That's an increase of 61% in the UK over 2013, and 156% taking account of global progress as well. The CB:PSB is committed to professionalising banking and these numbers speak volumes about the impact it's having.

As well as delivering the Foundation Standard last year, the CB:PSB defined and published the Leadership Standard for Professional Bankers. We intend it to have a broad reach across the senior banking population.

In it, we set out what customers and other stakeholders can expect from banking leaders: how we ought to conduct ourselves, how we should inspire, lead and motivate others to act professionally, and the areas where we should develop and maintain comprehensive professional expertise. This is the first time that banking leaders' conduct and expertise has been specified in this way. The Leadership Standard is both a statement of intent and a pathway to rebuilding confidence and trust in banking where it's needed most.

The CB:PSB is piloting the Leadership Standard across its member firms in 2015/16. At the same time, we're assessing alignment of the Standard with the Senior Managers and Certification Regimes, with a view to the Standard being taken up more widely when the new regulatory regimes come into force.

Professional Standards set expectations for individuals working within a profession. They allow benchmarks to be established and achieved. And, importantly, they create a common language, one which enables us to articulate what it means to be a professional. This has never been more fundamental to customers, other stakeholders and bankers themselves.

As we look at the industry through metrics collated by the CB:PSB (pages 4 and 5), we see some positive signs, with customer trust and confidence growing albeit at a slow pace. However, the pride which bankers feel in their profession has fallen back. This is a real concern and all of us must recognise and then respond to it.

The CB:PSB is changing banking. But, we have to get better at communicating this change both externally with our customers and internally with our colleagues - something our independent Advisory Panel is urging us to do. We have to celebrate those who achieve professional standards, use the benchmarks we've established to tell customers about our success and encourage those banks that are not members of the CB:PSB to join us.

There's a distinct 'standards landscape' emerging from the focus, particularly in recent years, on banking. Some players have been part of this landscape for decades – particularly the professional bodies, such as the Chartered Banker Institute. The CB:PSB itself has been operational since 2011, ahead of the Parliamentary Commission on Banking Standards, the Lambert Review, the Banking Standards Board (BSB), and shortly the Individual Accountability Regime.

The CB:PSB sees a key role for professional standards in supporting the new regulatory rules and regimes – a view echoed by others – and we're working closely with the FCA to define that role.

As the BSB takes shape under the Chairmanship of Dame Colette Bowe, both she and I are keen that our respective endeavours align effectively and I'm delighted to join the BSB Board. Its work to raise standards across banks will be vital.

The CB:PSB will maintain its unique role and focus – creating and implementing professional standards for individual bankers. And we hope our work will be instrumental to others who have become part of this landscape.

The key issue for all of us engaged in establishing, monitoring and raising standards in banking is to ensure the landscape is credible. It must not be overly complex and it has to deliver what is ultimately intended – so that customers have trust and confidence in banking and bankers.

My colleagues on the CB:PSB Board, including our new independent members Sue Lewis and Robin Somerville, join me in embracing this challenge. There's a great deal of infrastructure building around the common language of trust, confidence and professionalism in banking. The challenge for everyone now is delivery.

Overarching aims

The impact of the CB:PSB is measured against the following overarching aims:

- Facilitate industry and public awareness and recognition of the standards
- Help build, over time, greater public confidence and trust in individuals, institutions and the banking industry overall and enhance pride in the banking profession

In order to understand current awareness of the standards and levels of confidence and trust, the CB:PSB again commissioned YouGov Plc to ask UK adults, 'Opinion Formers', MPs and UK Banking employees their opinion in relation to the baseline measures that were agreed in 2013. The UK adults surveyed were a representative sample of the UK adult (18+) population. The 105 MPs surveyed represented MPs by party, gender, election cohort and geography. YouGov has built a panel of opinion formers in the UK who take part in online research. These participants are leaders in their field, drawn from business, politics, media, public sector, charities, academia and beyond.

The baseline measures are subjective and it is not possible to attribute opinions to any single factor or intervention. However, the measures give a snapshot of how opinions and awareness are changing.

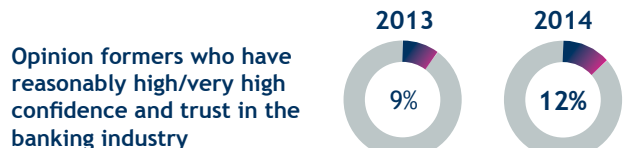
Following another year of media and regulatory scrutiny, public confidence and trust in individuals, institutions and the banking industry overall is improving. Likewise awareness of the CB:PSB and the role it is playing is also increasing.

Confidence and trust

As in 2013, UK adults felt more confidence in individuals working in banking rather than the industry overall. However, there is also growing trust in banking institutions and the overall industry:



Opinion formers/MPs were asked whether they had low, neutral or high confidence and trust in the banking industry:



“Professionalism and trust in Banking continue to be high profile topics, particularly in the eyes of consumers, and YouGov has previously produced a number of industry related reports, including public trust in banking. Since 2012, YouGov has contributed much of the research data to this and previous CB:PSB reports and we look forward to continuing to undertake future stakeholder surveys for the initiative.”

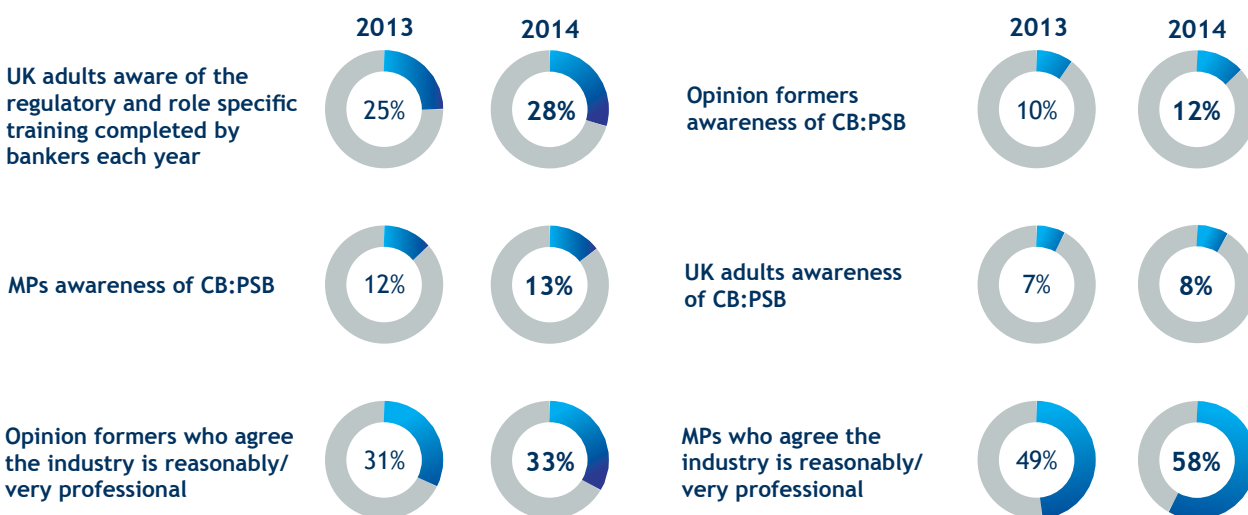
Oliver Rowe, Director of Reputational Research, YouGov

...ALL CUSTOMER FACING BANKERS WORKING TO MEET THE FOUNDATION STANDARD BY DECEMBER 2015...

Awareness and professionalism

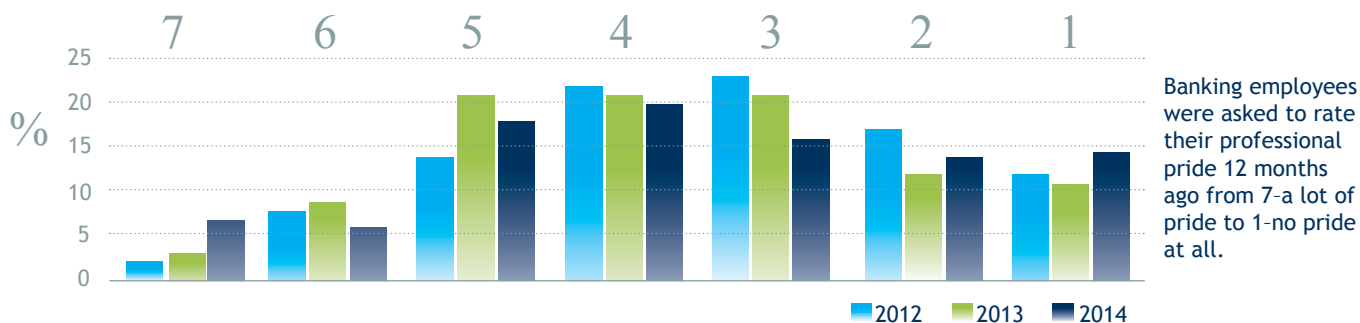
There is a continued growing awareness of the CB:PSB amongst opinion formers, the public and MPs.

The CB:PSB is becoming increasingly visible to banking employees, with member firms' efforts over the past year leading to a **41%** increase in awareness.



Professional pride

There was a positive increase in the number of banking employees that felt 'a lot of pride'. However, the increase in employees feeling no pride at all indicates that member firms and the banking industry overall still need to do more to build the professional pride of their workforce.



- All figures illustrated, unless otherwise stated, are from four separate surveys collated and analysed by YouGov plc on behalf of the CB:PSB.
- Omnibus survey - Total sample size was 2,022 adults. The survey was carried out online. The figures have been weighted and are representative of all UK adults (aged 18+). Fieldwork was undertaken between 12th - 14th September 2014.
- UK Opinion Formers Survey - The survey was carried out online. The figures have been weighted and are representative of all UK adults (aged 18+). Fieldwork was undertaken between 16/09/2014 - 01/10/2014. Total sample size was 676 Opinion Formers.

- UK MPs Survey - The survey was carried out online. The figures have been weighted and are representative of all UK adults (aged 18+). Fieldwork was undertaken between October 20th and 3rd November 2014. Total sample size was 105 MPs.
- UK Banking Employee Survey - Sample size 352. The sample size includes employees of all UK banking organisations, not just CB:PSB member firms. Fieldwork was undertaken between 5th - 9th September 2014.

An external perspective

PROFESSOR ROBIN JARVIS Chair of the Advisory Panel

Robin is Special Adviser, Association of Chartered Certified Accountants (ACCA) and Professor of Accounting, Brunel University.



The independent Advisory Panel, representing the views of banks' customers, acts as a critical friend to the CB:PSB and, in particular, to its Board. The Panel's main focus during the year has been on the employees of banks – the individual bankers who are bound by the Chartered Banker Code of Professional Conduct and work to meet its professional standards - the enhancement of external and internal communications and independence in the process of monitoring the implementation and adoption of CB:PSB professional standards by individual banks.

We firmly believe that individual bankers are the key stakeholder in the effective adoption of professional banking standards and if desirable values are to be embodied into the banking profession.

The achievement of the Foundation Standard, for the first time for many, offers opportunities and status for individual bankers. The Advisory Panel welcomes this development but challenges the Board and member firms to go further, and it's vital they do. If we look at the indicators of pride within this Report, we can see that there has been an increase in the number of employees feeling no pride. There will be a range of factors behind this shift, but the CB:PSB should take this as a clear indication of the work that remains to be done to restore pride.

The Advisory Panel wants to see more communication on the objectives and achievements of the CB:PSB both internally within the banks and externally. In particular, focusing on individual bankers – helping establish professional standards as critical to a professional bankers' career path and recognised across the banks. We want to see a culture develop where bankers will be expected to have attained a professional standard relevant to their role and progression, where it's a key credential on their CV and a differentiator at interviews.

Over the last year, the Board has welcomed two independent members. This will strengthen the Board's credibility and decision-making and is warmly supported by the Advisory Panel. However, we are keen to extend the theme of independence and have prompted the creation of a Working Group to look at how greater independence can be built into the monitoring of professional standards. My colleague Dr Ian Peters is chairing the Monitoring Working Group and I look forward to this group delivering fruitful outcomes later this year.

The Panel believe in the fundamental importance of professional standards in banking and we will continue supporting the Board to deliver its aims. As a critical friend should, we will challenge and disagree, but ultimately, just as the Board does, we wish to see this worthwhile effort continue and grow.

ROBIN JARVIS

“...helping establish professional standards as critical to a professional bankers' career path and recognised across the banks...”

...A JOINT, VOLUNTARY INITIATIVE BETWEEN EIGHT UK BANKS AND THE CHARTERED BANKER INSTITUTE...

Implementation of the Foundation Standard

Member firms have approached the implementation of the Foundation Standard in different ways, each approach taking account of cultural, infrastructural and strategic contexts.

The following two pages highlight examples of best practice for each of the five stages that members must go through to successfully implement the Foundation Standard:

- **Subscribe to the Chartered Banker Code of Professional Conduct**
- **Benchmark and set targets**
- **Implement**
- **Monitor**
- **Engage colleagues and celebrate success**

These best practice examples show the different approaches that members are taking, as they make the commitment to improve professional standards across their workforces.

...187,316 BANKERS ACHIEVED THE FOUNDATION STANDARD IN 2014...

Step 1

Subscribe to the Chartered Banker Code of Professional Conduct

Member firms subscribe to the Chartered Banker Code of Professional Conduct. They have two options:

- **Adopt the Chartered Banker Code as their own code of conduct**
- **Align their own codes of conduct to the Chartered Banker Code**

Virgin Money adopted the Chartered Banker Code as their own code of conduct and have embedded it across all parts of the business.

Barclays has incorporated the Chartered Banker Code of Conduct within its own Code of Conduct 'The Barclays Way'.

Step 5

Engage colleagues and celebrate success

All members are implementing the Foundation Standard in different ways, which suit their own organisation. Whichever approach they take, successful implementation depends on colleagues understanding the need for professional standards, and being committed to restoring trust and confidence in banking. This involves effective communication and colleague engagement, and celebrating and recognising colleagues' achievements.

Setting the scene

Lloyds Banking Group gives colleagues detailed guidance on the criteria and assessment procedures for the Standard. Clydesdale and Yorkshire Banks' CEO sets the scene with introductory messages which are backed up with intranet content and workshops.

Celebrating achievement

Tesco Bank invited their first wave of colleagues achieving the Standard to a recognition event, attended by the Banking Operations Director and their CB:PSB Board member. Standard achievers at Lloyds Banking Group receive a personalised letter of congratulations from the Group CEO, whilst Clydesdale and Yorkshire Banks hosted local celebration events for their initial Standard achievers.

Step 4

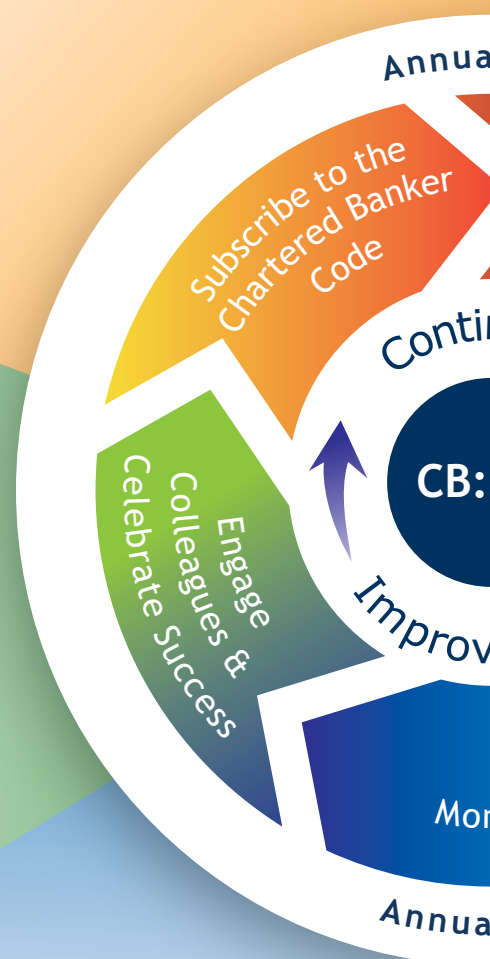
Monitor

Members monitor and quality assure their implementation of the Standard, which involves:

- **Self-evaluation by the implementation team**
- **Critical evaluation by an independent team, not involved in implementation**

The annual monitoring process is then completed through:

- **External Review by the Chartered Banker Institute's Professional Standards Team**



Step 2

Benchmark and set targets

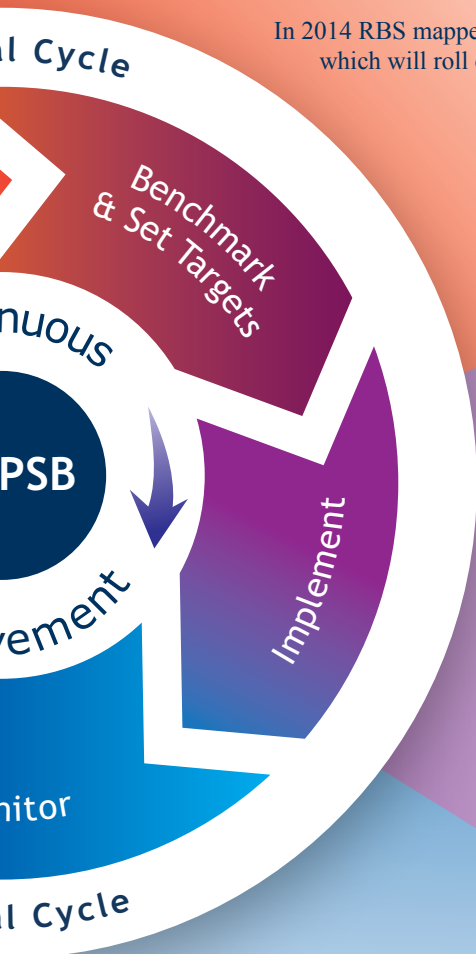
Members benchmark their existing learning, development and assessment processes against the conduct and expertise requirements set out in the Foundation Standard. The process enables members to:

- **Identify the gaps in their existing provision**
- **Identify in-scope colleagues**
- **Set annual implementation targets**

Lloyds Banking Group is committed to a mass roll-out of the Standard. In 2012 they benchmarked Group-wide and role-specific training for approximately 50,000 colleagues.

Santander used the benchmarking process to inform future implementation. This has led to a sustainable and scalable approach for 2015, based on a suite of e-learning.

In 2014 RBS mapped its mandatory and role-specific training. The result was a new phase which will roll out more widely in 2015.



Step 3

Implement

Member firms identify the best implementation approach for their organisation and colleagues and have evolved approaches as implementation of the Foundation Standard is mainstreamed. All the Standard's conduct and expertise requirements must be met, and in some cases members have chosen approaches that exceed requirements:

- **HSBC** has used the Certificate in Retail Banking Code of Conduct, supported by IFS University College and, in 2015, is moving to an approach supported by e-learning.
- **Clydesdale and Yorkshire Banks** and **Tesco Bank** used the Chartered Banker Institute Professional Banker Certificate to pilot the Standard and are now using e-learning to mainstream the Standard.
- **RBS** has used internal accreditation programmes, including the Commercial Banking Accreditation Programme, accredited by the Chartered Banker Institute. They have now adopted a 'One Bank' approach to roll the Standard out more broadly.
- **Virgin Money** created a bespoke e-learning solution to support all colleagues to meet the Standard.
- **Lloyds Banking Group, Santander** and **Barclays** benchmarked existing learning, development and assessment methods against the Standard's requirements to roll the Standard out.

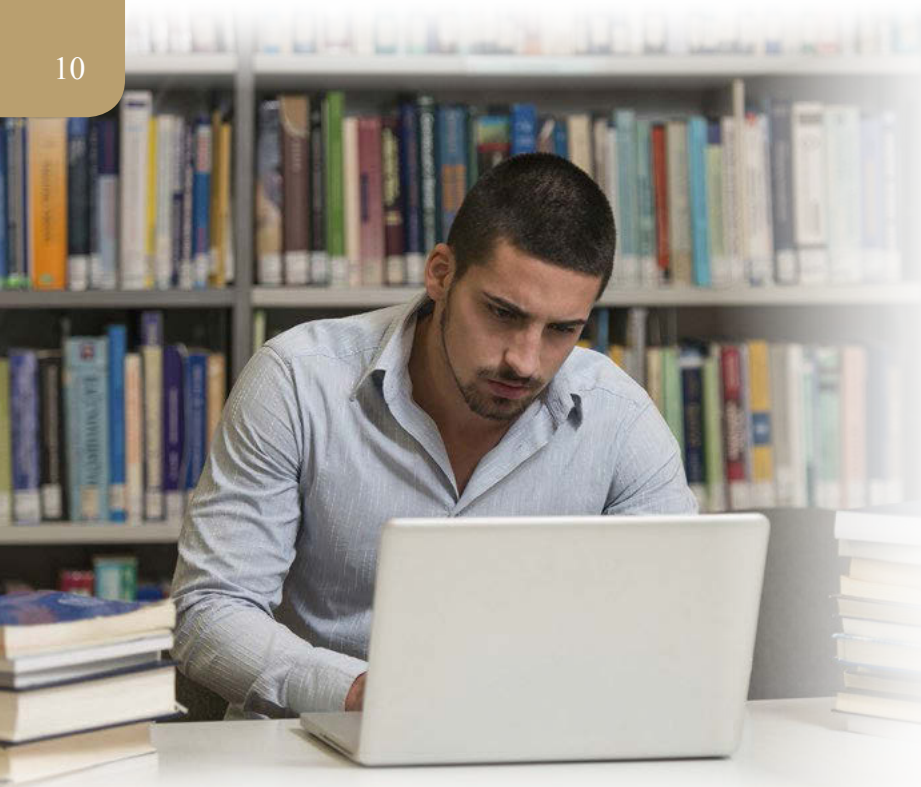
Monitoring can be integrated into existing teams' work, such as Internal Audit (at Clydesdale and Yorkshire Banks and Tesco Bank) or Banking Risk and Control (Santander). Alternatively it can be part of an Accreditation programme (RBS) which also provides external verification.

Senior leadership scrutiny is also vital to ensure monitoring is structured and robust. For example, at Lloyds Banking Group, the HR Director has sign off responsibility, whilst at Barclays, the senior leadership group in charge of business and culture change has strategic oversight.

“ I found the material for *Winning Trust** to be very relevant to retail banking and what I do on a day to day basis. Studying whilst working full time proved difficult at first but I got myself into a routine that ensured I had plenty of time to prepare before my test date. What I liked most about *Winning Trust* is that it gave me a really good background of the industry we work in and understanding of why we have certain procedures in place.”

Louise Fee, Service & Sales Manager, HSBC

* HSBC's programme to support the professional focus of frontline colleagues



“ The Chartered Banker Professional Standards Board Foundation Standard has helped me to gain an in-depth knowledge of Banking Operations. The various scenarios presented helped in understanding different situations. I think it is really important for all bankers to achieve this Standard to ensure we provide the best service to our customers.”

Joshua David, CSR Banking, Tesco Bank

“ I feel proud to have achieved the Foundation Standard for Professional Bankers. When discussing performance with my Line Manager, we regularly talk about the behaviours I aim to display under the Colleague Identity Model. It is great to be able to refer to the Foundation Standard for Professional Bankers as an example of my professionalism and customer focus.”

Chris Fairclough, Customer Sales Consultant, Lloyds Banking Group





“Completion of the Foundation Standard for Professional Bankers has developed my team's banking knowledge, reinforced the Bank's values and empowered them to focus on the needs of our customers and their businesses. As a team manager, it has helped me set clear and consistent standards for each individual on my team.”

Linda Taylor, Team Manager-Correspondence Team, RBS

“I achieved the Foundation Standard for Professional Bankers as a relatively new start to the Bank, and I felt this was a fantastic introduction that gave me insight into the banking industry and helped me gain the professional knowledge and skills I needed to perform my role. I have been able to incorporate this on a day to day basis in a number of roles since then, particularly in my current role as Conduct Regulatory Specialist. I feel I am more focussed on putting myself in our customers' shoes and understand things from their point of view, and therefore I feel more able to help our Bank not just to improve the customer experience but to get it right for our customers.”

Louise McCluskey, Conduct Regulatory Specialist,
Clydesdale and Yorkshire Banks



“Having this regular learning helps keep really important matters at the front of my mind. The topics covered helps me to ensure I think about the bigger picture when servicing my customers and I am always aware of issues to help keep myself and the business safe.”

Sharon Oates, Contact Centre, Virgin Money

Validating professionalism in banking

As part of their commitment to the improvement of professionalism in banking, member firms have agreed to a structured validation and monitoring review process.

The validation process

The validation process aligns to the CB:PSB's aims, and measures member firms progress on their:

- Commitment and strategic approach
- Implementation of CB:PSB professional standards
- Monitoring of CB:PSB professional standards
- Support for the overarching aims
- Reporting numbers of individuals achieving professional standards

The CB:PSB is continually working to evolve the validation process. This review period, for the first time, site visits were used to gain greater insight into member firms' practices. Feedback has been very positive. Implementation teams feel the process has been more robust, rigorous and comprehensive and has been effective in identifying areas for improvement and further progress.

During the review period there were two themed reviews: the first concentrated on monitoring of the Foundation Standard and supporting the overarching aims; the second looked at commitment and strategic approach, implementation of the Foundation Standard and reporting of numbers.

Each review had two stages - self-evaluation completed by member firms, followed by an external progress review, and site visit, by the Chartered Banker Institute. Each area for evaluation was graded, an overall grading was attributed and a risk register and action plans were agreed with member firms to address the areas identified for development. The CB:PSB is aware that member firms have much to gain from each other as they progress through their Foundation Standard journey and therefore best practice was also highlighted and shared.

Findings

The number of individuals achieving the Standard demonstrates the commitment of all member firms to professionalising banking:

187,316 individuals in the UK and globally have now achieved the Foundation Standard. Of these:

- **117,716** were from the UK - an increase of **61%** from 2013
- **69,600** were from out with the UK

Given the rigorous nature of the Foundation Standard, it is anticipated that some individuals will not meet it. In 2014, 11,000 individuals did not achieve the Standard due to conduct and/or competence related issues.

“As a member of the CB:PSB Advisory Panel, I know how important it is that professional standards are effectively implemented and monitored. For a voluntary initiative, the CB:PSB has created a significant degree of rigour. However, for an initiative as critical to the future of banking professionalism as the CB:PSB, it is important to consider how it may strengthen its rigour. The Advisory Panel has prompted the Monitoring Working Group which will look at how independence of the monitoring process can be enhanced.”

Dr Ian Peters, CB:PSB Monitoring Working Group Chair and Chief Executive, Chartered Institute of Internal Auditors

...LEADERSHIP STANDARD LAUNCHED 2014. IMPLEMENTATION PILOT UNDERWAY...

Action plans and risks

Action plans and risks are raised to monitor issues and to ensure that implementation remains on track. These actions and risks are monitored closely by member firms' and the Chartered Banker Institute on an on-going basis.

The last review period generated four risks and 28 material actions. Two non-material actions were also raised which related to areas of good practice. The figure below illustrates the focus of these actions:



The main areas for action related to Implementation and Monitoring of CB:PSB professional standards, with many member firms experiencing similar challenges.

Implementation of the Foundation Standard – Whilst challenges and barriers were experienced by all member firms, including developing scalable implementation approaches as the Foundation Standard is mainstreamed, they remain on track to have all customer facing colleagues achieve the Standard by December 2015.

Monitoring of the Foundation Standard – Some member firms have faced issues in ensuring that their internal management and reporting systems for professional standards are effective and scalable. As the number of individuals achieving the Standard grows, it is vital that members' systems remain fit for purpose. The CB:PSB is therefore providing support to member firms and sharing best practice to ensure that the annual re-validation process is as smooth as possible.

Continuously improving

By the end of 2015, the CB:PSB anticipates that all UK customer facing bankers will meet the Foundation Standard. This will account for a significant part of CB:PSB member firms' UK and global workforces and therefore it is imperative that the annual validation process becomes fully integrated into members' performance and appraisal cycle.

As the numbers of individuals achieving the Standard continues to grow, both in the UK and globally, the CB:PSB will have to adapt and develop its monitoring and validation procedures. Therefore in 2015, and in consultation with members, the CB:PSB will be reviewing the validation process.

Independence of CB:PSB validation

As the role of the CB:PSB matures, it is important that members and external stakeholders have assurance in the independence of the validation process. A Monitoring Working Group has therefore been established. Chaired by Dr Ian Peters of the Institute of Internal Auditors, with representatives from member firms and the Advisory Panel, the group aims to look at models which may increase independence and in turn enhance the rigour and credibility of professional standards monitoring. The group will report on its fully costed proposals to the Professional Standards Committee by the end of 2015.

...CB:PSB COMPLETED 16 EXTERNAL REVIEWS IN THE LAST 12 MONTHS...

Maintaining momentum

SIMON THOMPSON Chief Executive of the Chartered Banker Institute and Chair of the Professional Standards Committee



I'm proud of the impact and influence the CB:PSB is having on enhancing and sustaining professional standards in banking, as evidenced by our latest Progress Report. To fully establish the CB:PSB's professional standards at the heart of a revitalised, re-professionalised banking industry, there's still much more for us, and our member firms, to do in the months and years ahead.

Firstly, we will work, with the CB:PSB's member firms, to support the implementation of the UK's new Individual Accountability Regime. The regulators, the PRA and the FCA, have set out their requirements for almost all bank staff in the new Individual Conduct Rules, and for more senior staff in the Certification and Senior Managers Regimes. Banks that subscribe to the Chartered Banker Code, and have implemented the Foundation Standard, will be able to demonstrate to regulators that they have met their expectations with respect to the Conduct Rules. Indeed, they will have exceeded them, as although there is very strong alignment between the Conduct Rules and the Chartered Banker Code and Foundation Standard, the latter goes well beyond regulatory requirements, as a professional standard should. The Leadership Standard will help CB:PSB member firms, and individuals, meet the regulators' expectations regarding the Certification and Senior Managers Regimes.

Secondly, we will seek to develop and promote pathways between the CB:PSB's professional standards, and relevant professional qualifications, in order to provide next steps for individuals seeking to make a further commitment to professionalism, and to their career in banking. Research shows that the great majority of the public expect bankers – all bankers – to hold professional banking qualifications. Making sure the knowledge and skills demonstrated by achieving a CB:PSB professional standard are recognised and provide pathways towards relevant qualifications will help banks and bankers meet these expectations.

We look forward, over the coming year, to working with the emerging Banking Standards Board (BSB), as both the BSB and the CB:PSB share a common goal of raising banking standards, with the CB:PSB focusing on professional standards for individuals. We have already established a very good working relationship with Dame Colette Bowe and her team, and are delighted that Lady Susan Rice, as CB:PSB Chair, has been appointed as a member of the BSB.

Finally, I am excited by the prospect of growing CB:PSB membership over the coming year. CB:PSB member firms already employ the majority of UK bank staff, but we aim to increase our coverage to as close to 100% as possible, and are already in discussions with potential new members. The CB:PSB's founder members have all made very significant contributions to the development and implementation of industry-wide professional standards for bankers, making a firm Commitment to Professionalism that continues to this day. We will all be delighted if they are joined by new members, making their own Commitment, and helping further embed the CB:PSB's professional standards throughout the UK banking industry.

Simon Thompson.

“...I am excited by the prospect of growing CB:PSB membership over the coming year.”

...CB:PSB WORKING TO SUPPORT NEW ACCOUNTABILITY REGIME...

Advisory Panel Members

Acting as the voice of the consumer, the independent Advisory Panel supports the development of professional standards ensuring they are designed with a strong focus on customer outcomes. Members represent the ‘end users’ of CB:PSB professional standards which are the retail, business and institutional customers and stakeholders of member firms.

Chaired by Professor Robin Jarvis, Special Adviser, Association of Chartered Certified Accountants (ACCA) and Professor of Accounting, Brunel University, the Panel includes:

- **Joanna Elson, Chief Executive, Money Advice Trust**
- **Matthew Fell, Director for Competitive Markets, CBI**
- **Erin Flood, Senior Policy Advisor, Federation of Small Businesses**
- **Teresa Perchard, Independent Consumer Advocate**
- **Dr Ian Peters, Chief Executive, Chartered Institute of Internal Auditors**
- **Graham Rumney, Chief Executive Officer, R3:Association of Business Recovery Professionals**
- **Colin Tyler, Chief Executive, the Association of Corporate Treasurers**
- **Jennifer Walmsley, Director, Hermes Equity Ownership Services Limited**

Chartered Banker

Professional Standards Board

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