

Develop a compliance culture within your organisation

Overview

This standard is about determining and agreeing the values and assumptions that encourage behaviour which is consistent with your organisation's overall vision and strategy for compliance with its Anti-money Laundering and Countering Terrorist Financing obligations. This will be done in conjunction with the board and senior management at your organisation. You must communicate agreed values across your organisation, and ensure that policies, programmes and systems support agreed compliance values. You will continuously monitor and adjust values and assumptions, and the ways they are applied.

Develop a compliance culture within your organisation

Performance criteria

You must be able to:

1. agree values and assumptions that encourage behaviour which is consistent with your organisation's overall vision and strategy for compliance with Anti-money Laundering and Countering Terrorist Financing requirements
2. promote transparency and clear lines of accountability throughout the organisation
3. communicate agreed values across your organisation and motivate staff to put these into practice
4. ensure that the board, senior management and all staff recognise the importance of making compliance part of the culture of your organisation
5. put in place policies, programmes and systems to support agreed values
6. promote the benefits of compliance across the organisation
7. counter messages that conflict with agreed values in line with organisational requirements
8. continuously monitor and adjust values and assumptions, and the ways they are applied

Develop a compliance culture within your organisation

Knowledge and understanding

You need to know and understand:

1. concept of the compliance culture as applied to organisations
2. the importance of values in underpinning individual and organisational performance
3. internal and external factors that influence the compliance culture
4. different types of compliance culture and the relationship between compliance culture, strategy and performance
5. principles and methods of managing culture change within organisations
6. dominant types of compliance culture in your sector and their strengths and limitations
7. your organisation's vision and strategy
8. your organisation's current organisational and compliance culture
9. values, assumptions and behaviours that are consistent and inconsistent with your vision and strategy
10. needs and interests of key stakeholders
11. methods of communicating values, and supporting the way they are applied in your organisation
12. ways of dealing with messages and behaviour that conflict with agreed values and assumptions
13. your organisation's requirements relating to the application of codes, laws regulatory requirements and guidance, and potential conflicts with other regulatory regimes, as they impact on your activities

Glossary

Anti-money laundering and counter terrorist financing measures

This encompasses all required policies, procedures and systems as well as the requirement for regulated organisations to apply enhanced customer due diligence and enhanced ongoing monitoring on a risk-sensitive basis in certain defined situations and any other situations which present a higher risk of Money Laundering or Terrorist Financing.

Staff

Staff includes all levels and categories, including contractors, suppliers, temporary workers and interns.

Board

This is the body responsible for the strategic direction and overall running of the organisation. In some cases, depending on the type of organisation, this is also known as the governing body.

Develop a compliance culture within your organisation

Developed by	FLSP
Version Number	2
Date Approved	January 2016
Indicative Review Date	January 2021
Validity	Current
Status	Original
Originating Organisation	Financial Skills Partnership
Original URN	FSPAML7
Relevant Occupations	Finance; Financial Institution and Office Managers; Financial institution managers
Suite	Anti-money Laundering
Keywords	Anti-money Laundering; Countering Terrorist Financing; culture; compliance
