

Global Banking Education Standards Board

CONSULTATION RESPONSES

Threshold Competence for Professional Bankers

Responses Received

Four responses were received, as set out below, with the Education Standards Committee’s proposed response to each included:

1) Is the proposed level of threshold competence for professional bankers (one that is “equivalent to at least the first year of an undergraduate degree programme, in respect of educational level”) appropriate?	
Indian Institute of Banking and Finance	<p>The proposed level of threshold competence for professional bankers (one that is “equivalent to at least the first year of an undergraduate degree programme, in respect of educational level”) is quite appropriate.</p> <p>The “Junior Associate of Indian Institute of Bankers (JAIB)” examination being conducted by IIBF represents the common denominator knowledge which bankers in India are expected to know. Therefore, in this examination, almost all the aspects now mentioned in the Standard are being covered.</p>
AICB (Malaysia)	<p>I am ok with the proposed level of threshold competence for professional bankers (one that is equivalent to at least the first year of an undergraduate degree programme).</p> <p>However, in designing a professional banker learning programme, I may wish to design the difficulty to be a little higher than a first year under-graduate degree programme,</p> <p>My reason is that, usually a first year under-graduate degree programme, most of the knowledge is pitched at the declarative knowledge (what, where, when). To become a professional banker, or at least to attain this level, the incumbent should at least be introduced to procedural knowledge (how). The application of the knowledge, particularly how each of the key elements in the banking knowledge comes together in its practical sense, I believe is key.</p>
FINSIA (Australia/New Zealand)	<p>FINSIA queries whether the level of threshold competence being equivalent to at least the first year of an undergraduate degree programme is a level too high, especially for certain roles types such as back office operations.</p> <p>FINSIA supports the ability of member bodies being able to set higher requirements for the minimum level of threshold competence for certain roles and organisations if required.</p>
Hong Kong Institute of Bankers	<p>Perception is that this level is too low. Could we include QF levels instead of using university requirements?</p>
Proposed Education Standards Committee Response	<p>There needs to be greater flexibility allowed in the definition of level, whilst still providing appropriate guidance to member bodies wishing to set lower or higher criteria to reflect local conditions. Wording to be updated.</p>

2) Are the recommendations for the content of initial education programmes for professional bankers, as set out in pages 5-6, comprehensive given the Standard seeks to apply to all professional bankers worldwide? What, if any, additional content should be added? What, if any proposed content should be removed from the current recommendations?

Indian Institute of Banking and Finance	The coverage and content of the initial professional programme as enumerated in the Standard are quite comprehensive. Therefore, in our opinion, no further content needs to be either added or deleted.
AICB (Malaysia)	The coverage and content of the initial professional programme as articulated in page 5 and 6 cover key elements in banking. They are quite comprehensive, Other additional elements for consideration could be elements such as non-banks financial institutions, green financing, digital risk as well as legal risk..
FINSIA (Australia/New Zealand)	FINSIA considers the suggested content in the Standard is appropriate however suggest the topic “Professional Ethics” should be renamed “Ethics and Professionalism” to better reflect the suggested content. Although the commentary for the Professional Ethics topic outlines the need for consistency with the GBESTB’s Standard: Ethics Education and Training for Professional Bankers, the required content in this Threshold Competency Standard seems to be quite narrow in focus on regulatory and professional codes. This content in this topic for this Standard should be broader in scope.
Hong Kong Institute of Bankers	Some flexibility needed – perhaps also refer to local regulatory requirements.
Proposed Education Standards Committee Response	Reword “Professional Ethics” as per suggestion. Draft already refers to Ethics Education Standard, so not appropriate to broaden out the section in this standard – but perhaps tighten up wording to make it clear that the Ethics Standard should be followed. Also allude to local regulatory requirements

3) In what ways might the Standard support the efforts of international and national regulators to raise standards of ethical and professional competence in banking?

Indian Institute of Banking and Finance	The Standards seek to establish the threshold competence among professional bankers. If the content of the initial professional programme, as enumerated in the Standard, are taken into consideration and dovetailed in the qualifications awarded by the GBESTB Member Countries, it will ensure application of a uniform set of standards in professional education among all the GBESTB Member Countries. In the long run, this may also enable mutual recognition of the qualifications awarded by different banking institutions across the globe. This is in fact one of the avowed objectives of setting up of the Global Banking Education Standards Board.
AICB (Malaysia)	The coverage and content of the initial professional programme as articulated in page 5 and 6 cover key elements in banking. They are quite

	<p>comprehensive,</p> <p>Other additional elements for consideration could be elements such as non-banks financial institutions, green financing, digital risk as well as legal risk.</p>
FINSIA (Australia/New Zealand)	<p>FINSIA suggests this Standard will support the efforts of regulators to raise standards of professionalism and ethical competence as a result of the activities of the member bodies in monitoring the impact of the Standard.</p> <p>However, FINSIA queries whether customer and employee surveys survey will provide useful feedback on how the standard is being implemented.</p>
Hong Kong Institute of Bankers	n/a
Proposed Education Standards Committee Response	No response needed

Additional Comments	
FINSIA (Australia/New Zealand)	<p>In General Recommendation 4 the Standard encourages member bodies to introduce annual CPD requirements for Professional Bankers. FINSIA suggests annual CPD should be a requirement to continue to use the term Professional Banker.</p> <p>FINSIA suggests the Threshold Competence for Professional Bankers Standard should provide clarity around whether the content requirements apply to every Professional Banker or whether certain topics are optional depending on roles. FINSIA also feels it is important the Standard provides clarity around the role types it would be considered for this standard to apply.</p> <p>FINSIA looks forward to providing additional input to the standard as it is finalised and to raising awareness of the standard when it comes into effect.</p>
Hong Kong Institute of Bankers	<p>Can we ensure that only members of the GBESTB can claim they are compliant with the Standard, to demonstrate value of membership?</p> <p>No commercial use of standard – clarify what this means.</p> <p>How can we protect “Professional Banker” designation?</p>
Proposed Education Standards Committee Response	<p>On CPD: we agree in principle – but this may be dealt with in a CPD standard rather than in this Standard. Point 4 in the Threshold Competency Standard does introduce a requirement for CPD.</p> <p>Additional guidance added to 11 to make clear that only members can claim they are compliant.</p> <p>Add wording to clarify “relevant to role and function”, etc.</p>