

Meeting Regulatory Deadlines

A Case Study

A Client in the Financial Services Sector

Summary

Legislation is an inflexible target. Everyone knows that in business slippage is a frequent occurrence, whether it be for the delivery of a report, a new IT system or for a new account being opened. In this instance, not meeting the deadline dates would mean going out of business.

We were asked to bring our project management disciplines and skills to this client in order to make sure that they met these externally set deadlines. They also wanted to take this opportunity of upheaval to ensure at the same time that all sales processes not only complied with the legislation but also became more streamlined. Our role was to assess the organisation and understand what the legislative change requirements were. We then had to make sure that all those in the business who should be involved were, at the right level of intervention and the right time.

We ensured that the projects working towards compliance across the business were all subject to the same rules and demands, we established the priorities and the right people to deal with all the actions.

Introduction

A client in the Financial Services sector was increasingly concerned at the amount of work that seemed to be emerging in the organisation as a result of impending legislation. The deadline for the going live is October 2004, but a hidden deadline is 6 months earlier – April 2004. This is because in October 2003 the FSA stated that everything must be *running* in a compliant manner by the deadline date, not simply *ready to run*. In order to do this, systems and products have to run in parallel for 6 months to ensure a full and smooth transition.

The key objectives of our work are to ensure that the statutory deadlines are met and that all departments are in tune with the required new ways of working.

Background

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What We Did

Our role was to assess the organisation and understand what the legislative change requirements were. We then had to make sure that all those in the business who should be involved were, at the right level of intervention and the right time.

The Compliance Department was our biggest ally, in that they were the ones with their finger on the pulse when it came to understanding the detail of the legislation. We asked them to summarise the 500 pages or so of instructions and requirements so that a handy guide was available. For each legislative section they put which departments in the company would be affected. This helped the staff understand what their starting points were, and gave them an indication of the kinds of tasks they would need to undertake and the things which would need to be considered within their area. From this they were able to begin creating the plan of work, working back from the deadline.

We put one overall plan for the organisation together, covering both Mortgage and Insurance regulation. This gave a complete view of what was happening and when it was supposed to be, so that progress could be readily assessed. Our concern at this point was to ensure visibility at all times, rather than a blind adherence to the plan. Given the scale and complexity of the programme it was important to ensure that everything was known; on balance it was less important to insist on absolute timeliness. A little slippage was only to be expected on something so massive. The trick was to understand how it could be pulled back and everything put back on track.

To this end, we established project disciplines in both formal and informal settings so that the greatest possible number of people were involved, whilst being very careful not to overburden them with excessive commitments on their time. We ensured that the projects working towards compliance across the business were all subject to the same rules and demands, we established the priorities and the right people to deal with all the actions.

The Result

Obviously, with the go-live date still to come, the project has not yet run to its close. However, so far progress is being made. Visibility of the entire programme is high within the organisation. Everyone knows what needs to be done, when, and why. The work is under way, in the right order and format. The dependencies are known. The risk is understood. The client organisation is well on its way to being fully compliant with EU and UK legislation.