

Banking

Ensuring effective roll-out of **Sanctions Programme** for the African operations of a leading Global Bank

Combining **stakeholder management** practices with **change management** to ensure the **successful roll-out** of a Sanctions Programme for the Emerging Market operations of a leading global banking group



Overview of the client's needs

- Ensure clear definition of the responsibilities of UK teams, local programme team and in-country stakeholders
- Mitigate confusion and misunderstanding by creating effective flow of information across various stakeholder groups
- Perform stakeholder analysis in order to create a detailed change management plan



Objectives of the engagement

- Achieve compliance with international regulations defined by US Treasury, EU, UN and the Bank of England
- Implement Group Policy on Sanctions and Prohibition of Business Activities across the Bank's operations in Botswana, Ghana, Kenya, Mauritius, Seychelles, Tanzania, Uganda, Zambia, Zimbabwe, Egypt, India and the UAE
- Minimise the impact of the change to business as usual for global and African operations



Benefits of the change

- Reduced risk of suspect countries, organisations and individuals transacting with the bank
- Compliance with international regulations
- Standardised processes and practices across all countries involved in the change

Despite **geographic, cultural and logistical challenges**, BSG facilitated the **successful roll-out** of the Sanctions Programme across **14 countries, three continents and six time zones.**

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Engagement Overview

Banking organisations are required to comply with a various regulations and governance requirements, depending on their scope of operations. As a global banking group, the bank was required to deal with such regulations at international, national and group level. To achieve consistent levels of compliance across the Group, the bank published a Group Policy on Sanctions and Prohibition of Business Activities. BSG was contracted to achieve compliance with the policy within the bank's emerging market operations. Using the MSP (Managing Successful Programmes) methodology, BSG set out to plan and guide the programme.

At the outset of the programme, BSG performed initial analysis and identified three key programme risks:

1. The responsibilities between the UK teams, the local programme team (of which BSG was part) and the in-country stakeholders were poorly defined.
2. The flow of information between stakeholder groups (UK, SA and in-country stakeholders) was unclear and inconsistent information was being disseminated, which resulted in confusion and misunderstanding
3. The lack of understanding of the African banking context by the UK Group stakeholders related to daily operational realities within African countries

Solution

BSG identified stakeholder management as the key mitigating factor for these risks and as such defined a comprehensive stakeholder management plan, which was subsequently followed and actioned in parallel with the business analysis activities:

- BSG crafted a detailed change management plan, based on the stakeholder analysis, designed to ensure communications from the local programme team to the UK and to the in-country stakeholders was delivered regularly, accurately and in a consistent fashion
- The team planned and conducted visits to each of the countries within emerging markets to meet with key in-country stakeholders and establish a basis for meeting the programme's requirements. The visits were primarily used to complete detailed process mapping and other business analysis work in each country, but the face-to-face interactions with stakeholders were identified as pivotal relationship building activities

The personal interaction with key in-country stakeholders allowed the programme team to establish relationships with the people who ultimately impacted by the changes introduced. The intimate knowledge these stakeholders had of the business, its constraints and challenges and the operating environment was crucial – not only in designing an effective solution, but also in obtaining commitment

and buy-in to the change from the business users. Effective relationships in the business areas allowed BSG to gather specific information regarding systems, processes, constraints and challenges in each country and ensured a team of committed individuals in each country who were prepared to 'champion' the cause of the programme with reluctant users and stakeholders. This played a major role in translating the high-level requirements into effective business activities.

The programme team faced a number of geographic and logistical challenges:

- Programme stakeholders were spread across 14 countries, three continents and six time zones, which resulted in numerous difficulties, including working time (local time vs. UK time), cultural differences (in the UAE and Egypt, a work-week runs from Sunday to Thursday) and difficulty setting up meetings and visits
- During the course of the programme, the bank restructured its Africa and Indian Ocean business unit, incorporating it into the Emerging Markets business cluster, which resulted in the regional office being moved from Johannesburg to Dubai. This meant changes to programme stakeholders and reporting lines as well as an extension in scope to include Egypt, India and the UAE
- The UK office lacked the necessary of understanding of the complexities of the practical realities of operations in Africa and expected branches in the emerging markets to have the same infrastructure and resources as a branch in the UK
- The sector growth across most of the emerging market countries means they are largely under-resourced, with staff operating consistently at full or near-full capacity. This means they have very little time to devote to project activities, as Business As Usual (BAU) activities must be their priority

Through the creation of a sound communication plan, which defined stakeholders in terms of their responsibilities and expectations, taking into account communication requirements and constraints, the programme team was able to effectively management the expectations of key stakeholders. By dealing with each stakeholder level individually, and at country-level, the communications plan, through regular and consistent communications, ensured expectations, risks and delivery were all successfully managed.

Expansion of the stakeholder map and communications plan mitigated the impact of the restructuring of the Africa and Indian Ocean business unit.

The programme team conducted visits to each country identified in the scope of the project, which enabled the team to proactively identify the disparities between operations in each country and those of the UK. This allowed the team to manage the expectations of the UK Group Programme team and helped maintain feasible milestone schedules and communication of realistic requirements to in-country teams.

BSG managed the BAU requirements by grouping together communications and requirements. Testing and training activities were grouped according to release dates, which helped shape the training and change release plans, minimising disruption to BAU. As the staff in-country did not have the free time available to sit in long training sessions or workshops, BSG designed the training and accompanying communications so it could be effectively distributed within the various countries.



BSG making a difference

BSG believes that stakeholder management alone will not define whether a programme will be a success or a failure, but that effective stakeholder management enhances the success of a programme by reducing the amount of resistance to the future change. Without stakeholder management, the Sanctions Programme would not have failed in terms of delivering capability in the form of compliant systems and processes, but would have been a complete disaster in terms of the effective use of these. Thus the programme would not have met the overall objectives of achieving compliance without adversely affecting normal business processes. Awareness, buy-in to the change and ownership of the solution by business were all achieved through effective stakeholder management and were critical to succeeding in implementing a compliant and sustainable solution that supported the business.



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