



Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem



Human
Resources

SSM On-Site Allowance Policy

Applicable to: Banking Supervision Inspections Division - Onsite
Mission Staff

Policy Owners: Human Resources Division

Banking Supervision Inspections Division

Document History

Document Location

The most current version of this policy is available on the HR Site on Plaza. Paper copies are valid only on the day they are printed. Refer to the owner if you are in any doubt about the accuracy of this document.

Revision History

This document will be reviewed from time to time to take into account changes in legislation, organisational developments and experience of the policy in practice.

Date of this Revision: May 2015		Date of next Revision: March 2016
Revision Number	Revision Date	Summary of Changes
0.1	June 2015	Policy Created

Approvals

This document requires the following approvals:

Title:	Human Resources Director Credit Institutions Supervision Director
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Distribution

This document has been distributed to the approvers listed above, plus:

Name:
Human Resources Directorate Banking Supervision Inspections Division Staff

1. Introduction and Objectives

Banking Supervision Inspections Division (BSID) has been formed and has embarked on an entirely new way of working. BSID was established as part of the implementation of the Single Supervisory Mechanism ('SSM') whereby Banking Supervision was restructured in advance of SSM implementation on 4 November 2014. The primary role for the BSID staff as part of the new BSID is:

- (a) the performance of on-site inspection work in credit institutions as mandated by the European Central Bank, under the Single Supervisory Mechanism (SSM) for Significant Institutions (SI's); and
- (b) to conduct required inspections on Locally Significant Institutions (LSIs).

A cohort of Banking Supervision Staff will now be required to spend approximately 70% to 90% of their working time, onsite in Credit Institutions carrying out Inspections (Missions) for an average of eight week in duration.

Banking Supervision staff are required to report directly to the credit institutions site and not to the Central Bank offices for these inspections. For purposes of independence and confidentiality, the Central Bank of Ireland requires that Banking Supervision Inspections Staff are precluded from using onsite restaurant facilities by the Central Bank of Ireland ('Central Bank') during these Inspections except in exceptional circumstances. In addition the majority of onsite locations are inside the 8km radius of the Central Bank and therefore these staff are not entitled to claim tax free subsistence under the Bank's Business Travel and Expense Policy. On the basis of the above the Central Bank has introduced an SSM On-site Inspection Allowance Policy for BSID Inspection staff effective 1 January 2015 which is up to €7,290 gross per annum depending on the number of missions conducted within the 8 km perimeter.

2. Scope

This policy applies only to BSID Inspection staff who:

- (i) are available and assigned to work on-site in credit institutions carrying out Inspections (preparation, execution and reporting) under the Single Supervisory Mechanism (SSM) for 70-90% of their available working time;

- (ii) are assigned to missions and report directly to the site of the credit institution for the duration of the investigation phase of the mission; and
- (iii) Sign contracts of employment which include the SSM On-Site Inspection Allowance

3. Policy Details

3.1 Independence and Conflicts of Interest

Effective 1 January 2015, BSID staff will undertake on-site inspections in credit institutions for periods of much longer duration than was previously the case, with many missions being of 8 weeks duration, conducting the investigative phase of the inspection. It is therefore desirable to put measures in place to ensure that BSID staff remain independent of the inspected credit institution and that conflicts of interest are avoided. Therefore, staff covered by this policy (SSM On-Site Inspection Allowance) are not permitted to use the restaurant or catering facilities of credit institutions, except in very exceptional circumstances¹, with the exclusion of using tea or coffee making facilities where these are available.

3.2 Interaction with Business Travel and Expense Policy

Under the existing Business Travel and Expense Policy dated October 2013 *“Expenditure on meals can only be reimbursed under certain conditions: - staff must be absent for more than 5 hours and be more than 5 km from their home or work”*². Where BSID staff are not eligible to claim for meals on the basis that they are working within an 8 km radius under the 2015 Business and Travel Policy of the Central Bank Headquarters they will be eligible for the SSM On-Site Inspection Allowance for the duration of such missions.

As the SSM On-Site Inspection Allowance covers travel and subsistence costs, within 8 km, the cost of taxis, buses, luas etc. cannot be claimed when the SSM On-Site Inspection Allowance is claimed as it already includes an allowance for travel.

¹ If any exceptional circumstances arise where it is considered necessary to use credit institution restaurant or catering facilities, this should be agreed with local management setting the rationale for the exception to policy.

² This will change to 8km from July 2015.

3.3 When BSID Inspection staff are assigned to other roles

In circumstances where BSID staff are working on overseas missions and are either eligible for Central Bank or SSM subsistence, under general Business and Travel Policies, then the SSM On-Site Inspection Allowance will not be payable. Similarly, where BSID staff are not available for on-site missions e.g. assigned non-inspection roles within BSID or roles in another Division on a temporary basis they will not be paid the SSM On-site Inspection Allowance.

3.4 When BSID Inspection staff utilise Central Bank Restaurant

For a small number of inspections the inspectors will be based within walking distance of the Central Bank of Ireland staff canteen. In such circumstances, if the inspectors utilise the Central Bank staff restaurant for lunch the SSM Onsite Allowance payable for those days will be downwardly adjusted by 66%.

3.5 Monthly Sign-Off of the Approved Allowance

The payment of this allowance will be monthly and is subject to sign off at a Head or Deputy Head of BSID level for implementation of payment in accordance with the HR required approval process. The payment of the allowance has been approved and will be reviewed after it has been in place for one year.

4. Key Roles and Responsibilities Under this Policy

Approver:

It is the role of the approver (Head or Deputy Head of BSID) to verify and provide sign-off to Human Resources Division – Payroll monthly in line with Payroll deadlines and procedures confirming payment to eligible staff.

Head of Mission:

The Head of Mission is responsible for ensuring that the mission is conducted with due regard to ensuring that the independence of the mission team is maintained and conflicts of interest are avoided.

BSID Inspections Team Member:

Each team member is responsible for conducting the mission while maintaining their independence and avoiding situations that might give rise to a conflict of interest.

5. Associated Policies, Procedures and Supporting Documents

The interaction between the existing Business and Travel Policy dated October 2013 is discussed in section 3.2. (new policy for 2015)

Additionally this policy will interact with the ECB Travel and Subsistence Allowance when it is approved by the Supervisory Board later in 2015.

6. Referencing and Sourcing

Business and Travel Policy - October 2013 (New policy in place for 2015)
