

# Presentation of Country feedbacks on the FSSEQF Translator

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## INTRODUCTION

This document aims at giving an overview of the results, feedbacks and inputs emerged from the consultation phase which the Translator has gone through:

Partners consulted the Translator locally with NQA and other stakeholders, using a variety of ways and methods. The main approach was Focus groups.

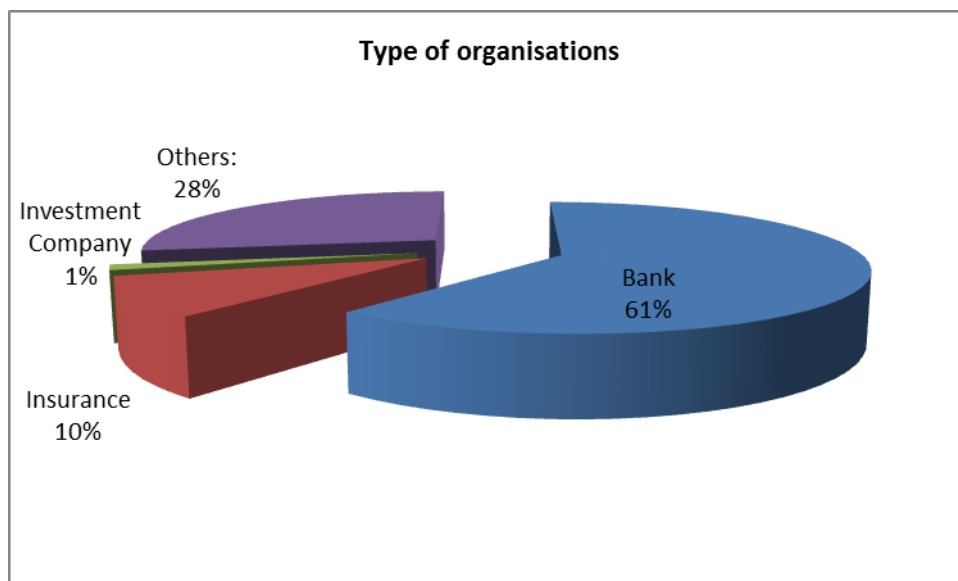
Relay Partners consulted the Translator with local stakeholders

EBTN members

A special questionnaire to collect feedback was provided.

The results are presented in a comparative perspective here below.

## BACKGROUND INFORMATION



Among the other institutions contacted the following were cited:

Training/University, Trade union, National High School/training institution, Higher academic institution, Bank training institute, Cooperative savings, National authority, National securities, National agency for Qualifications in Higher Education and Partnership with Economic and Social Environment

The consultation processes involved Romania, Portugal, Italy, Poland, Spain, Germany, Malta, Belgium, Slovenia and Scotland.

The respondents have been the following:

32 respondents in Romania mainly from Bank and Insurance organizations;

6 respondents in Portugal from Bank institutions;

1 respondent in Portugal from a Trade Union;

1 respondent in Portugal from a National Agency;

8 respondents in Italy mainly from Banks;

13 respondents in Poland mainly from Banks and High School/training institution

1 respondent in Spain from an Higher academic institution;

1 respondent in Belgium from a Bank Training Institute;

4 respondents in Scotland mainly Banks, professional Bodies and Scottish Qualification framework;

1 respondent in Slovenia from a Bank institute;

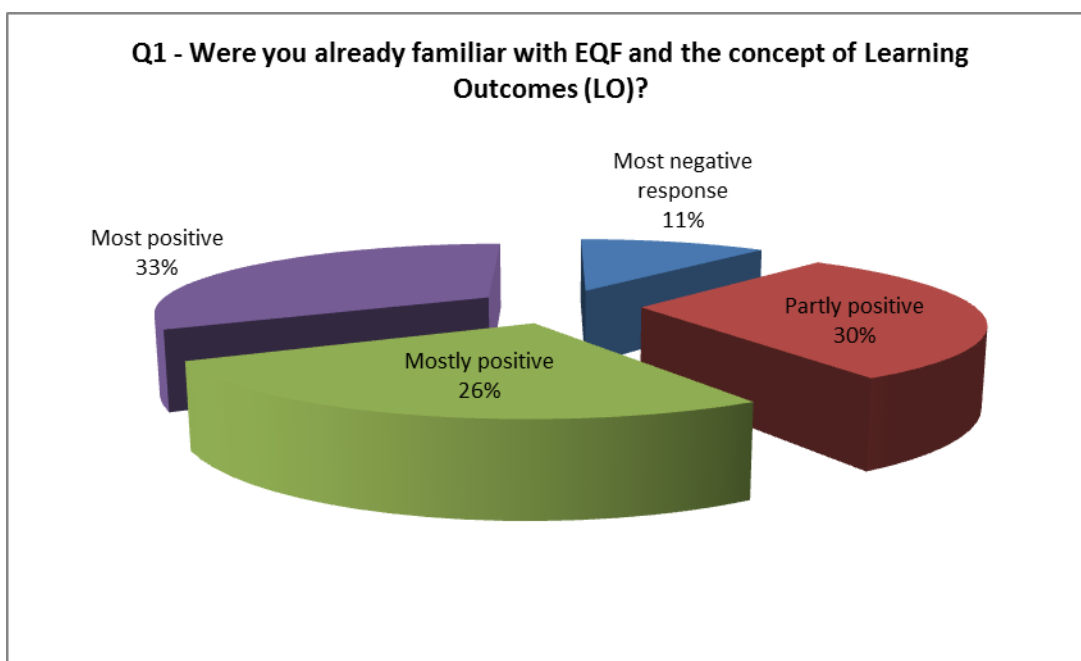
1 respondent in Germany from a University / Institute for Research and Development;

3 respondents in Malta mainly from training institution, Lobby group and Trade Unions.

## CLOSED QUESTIONS

### 1. Were you already familiar with EQF and the concept of Learning Outcomes (LO)?

The numerical results seem to be higher than the comments and the general feeling that's probably a "vote of confidence" for FIRS project.



#### Remarks:

Italy has very complex (and partially complete) rules about qualifications: as such they can be provided only from regional Public Authorities. It is necessary to clarify what is the precise circle of application of EQF in Italy: at the moment a big confusion seems to arise. About certification, we have somehow the same situation. The adoption of a common meaning to the same 'object' is necessary (i.e.: many private bodies provide certifications but they can not be considered 'public certifications').

It is a fact that the European qualifications framework is not very widespread in Portugal.

The banks are aware of the existence of EQF, though not deeply familiar with the subject.

The EQF is not so widespread in Spain.

I took part in the project meeting (in Warsaw) when the Translator were under elaboration

Yes, but very generally

Majority of implementation programmes for certain jobs is based on the criteria organised that way (knowledge, skills, competences).

The initiative known on general level, without framework and details

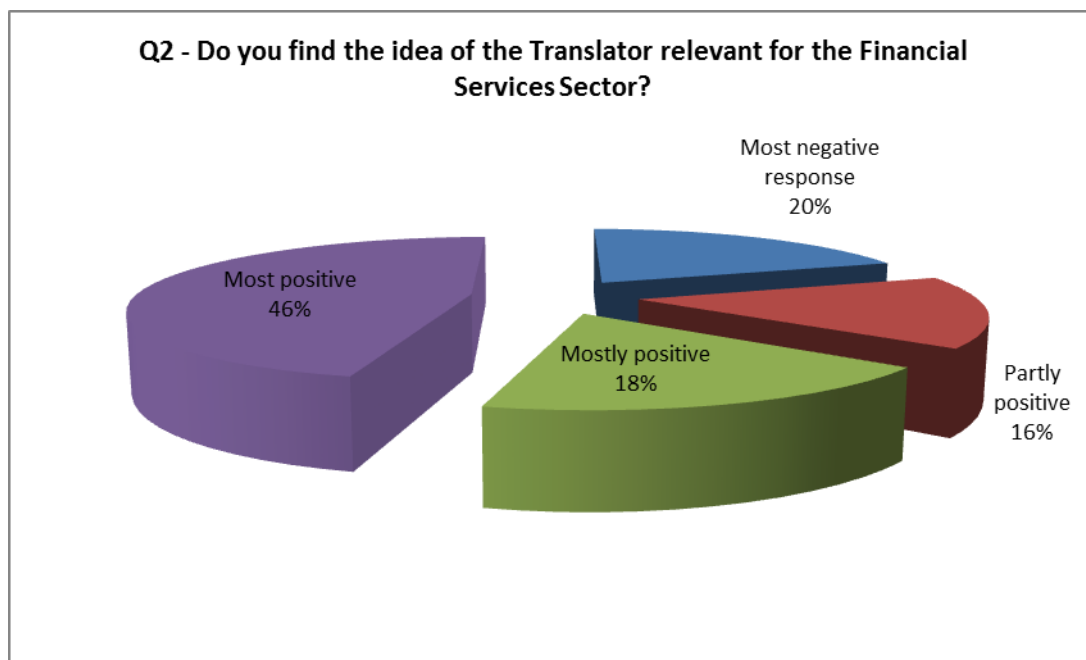
I have participated in multi-year projects, Phare TVET - 2005, 2006 and attended the Sectorial Committees meetings with an important role in describing and validating the qualifications of the IPT.

I was involved in the development of National Qualifications Framework in Romania since the beginning; the recommendation to develop a National Qualifications Framework was of the Phare TVET 2001 project; it concerned the modernization of vocational and technical education and was implemented by the National Centre for Development of Vocational and Technical Education (CNDIPT); I attended some sessions of the CE working group to develop the EQF; through the multi-year projects, Phare TVET, CNDIPT helped creating the National Qualifications Authority, the development of VET qualifications based on learning outcomes, the institutional development of the Sectorial Committees which have participated in describing and validating the qualifications of the IPT.

There is a high understanding of both EQF and the concept of Learning Outcomes but the general comment is that more needs to be done in translating this framework into actual operational and applications within the internal and external training programmes of financial services providers.

## 2. Do you find the idea of the Translator relevant for the Financial Services Sector?

The 64% of positive or very positive feedback together with a lot of very positive written feedback is a very good result also considering the low knowledge of EQF stated in the previous question Q1.



### Remarks:

Please, note that, as far as we know, there is a very low level knowledge about EQF and ECVET and certification of competences in Italy, also in our industry. As a consequence, a correct use of the translator should be anticipated from a higher level of knowledge of EQF and ECVET.

There is a great need for promotion/dissemination of EQF and of the Translator. Nationwide we did not do very much to accustom the stakeholders with the philosophy of the EQF.

The idea of an FSS EQF Translator was universally well received.

Although the employers are still not paying too much attention to the quality of training, the unions are very much in favor of FSS EQF as an instrument for opening employment opportunities for their members. We can expect the unions to be strong supporters of our work.

Limited added value.

EQF translators for the FSS can be an added value especially to those Financial Institutions that have branches abroad, considering mobility purposes.

The Financial Services Sector requires specific qualifications. So, considering the globalization/labor mobility, the comparison and equivalence of qualifications is an extremely important aim and this translator will help in doing that job.

The Translator represents also a framework to the sector qualifications, and therefore it is a reference and a very import tool.

It makes the instrument more accessible, thus relevant for professionals in the sector, who do not possess detailed knowledge of EQF. The translation to practical, sector recognised outcomes enhances the success of implementation.

The stakeholders consider the Translator to be a very important framework inside the sector, besides the EQF.

it makes the instrument more accessible, thus relevant for professionals in the sector, who do not possess detailed knowledge of EQF. The translation to practical, sector recognised outcomes enhances the success of implementation.

Yes, but the application of the FSS translator depend on the implementation of the EQF as a whole, which seems slower than expected (at least in Spain)

Definitely yes, because we have been functioning in EU for a few years and we should not think locally, but rather globally.

Definitely yes. Implementation of the Translator will allow standardised approach to qualification assessment (K,S,C) in EU countries.

It might be a useful tool that gives a chance.

Yes, mainly in employees development and external recruitment

I consider very appropriate the introduction of such a translator, with a role in harmonizing national qualifications levels and the EQF levels.

The existence of a translator is very useful, especially in the absence of national level descriptors; such a translator will make it easier to relate to EQF levels regarding the recognition of qualifications obtained in different learning contexts; it is a useful tool for those who develop qualifications in the field; if there is a recognition of the descriptors in several states, that will facilitate mobility.

Especially meaningful for transnational communication and practice

I'm not aware there is a burning need for this, however if this could be relatively easily mapped for existing qualifications and used for future developments then I could see some plus points.

There is a high appreciation that the idea of the translator is relevant for the financial services industry. Persons interviewed believe that more information about this project should be given to financial services operators and their training managers.

### 3. Is the Translator presented in a clear and understandable manner?

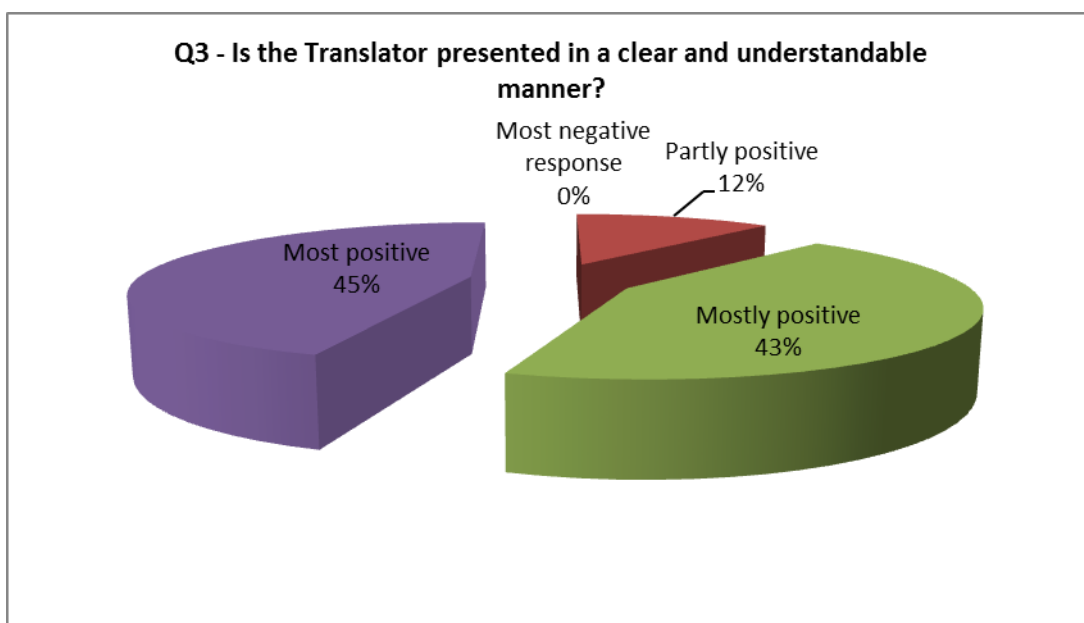
No negative feedback: the Translator is CLEAR.

In the comments the following remarks are put forward:

LO tend to be more representative of jobs rather than qualifications;

Measurable outcomes for knowledge; the need to tackle a diversity of types of qualifications, including those based on knowledge;

Sometimes skills and competences are hard to differentiate



Remarks:

The methodology used was unanimously approved (even by university representatives, although in Romania, as in other countries, there is still a wide gap between the Labor Ministry and the Education Ministry on the subject of EQF)

Question raised: If we look at these 4 level translators, we observe that in some qualifications, some of the suggested LO do not match with the LO of the real qualifications as they stand now, for instance concerning responsibility and autonomy aspects.

There is a question of the balance between the three LO. It is not clear how can we attribute a level for a qualification that is centred mainly on the LO - knowledge.

It makes sense that the level of complexity concerning Knowledge, Skills and Competences increases vertically as the EQF level becomes higher.

Defining measurable outcomes could enhance the knowledge factor.

Yes, but some of them are closer to job activities than to learning outcomes.

Yes. It is not possible to make it very simple, because each organisation is different and referring to different levels requires a deep analysis.

Approach and principles of the Translator elaboration were presented in a clear and understandable way.

The meeting on the 8th of February helped a lot.

Distinction between skills and competences is not transparent

The manner of presentation allows comparisons between levels.

The presentation of the Translator along with the EQF descriptors makes possible a proper correlation of the levels.

Please note that it probably should be "crossroads" rather than "crosswords"?

The translator is clear and understandable but more needs to be done in linking theory and the practical aspect of operations to further improve the importance of this project.

#### 4. Are the examples of LO appropriate for the sector?

*No negative feedback is given, the comments provide some ideas to fine tune the appropriateness:*

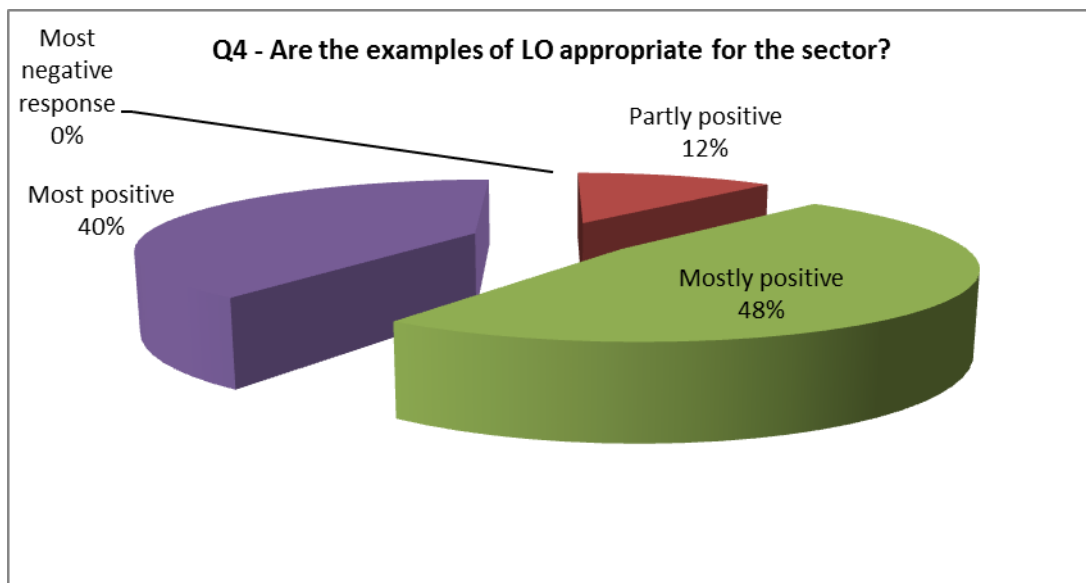
*Suggestion to eliminate adjectives and adverbs and stay only with verbs (**mastery into proficiency**);*

*Request for a stronger behavioral component (e.g. proactivity, flexibility, coping with unexpected situations, **leadership**, also soft skills which are a differentiator for FSS;*

*More LO for the insurance and investment sector; add LO on understanding of system risks;*

*Add LO on the ability to anticipate; add LO on problem solving and decision taking, less on innovation (e.g. **be sensitive to creativity**);*

*Competences should be more oriented to people rather than processes*

**Remarks:**

ABIF is used to apply the Bloom's taxonomy for its training activities. Our learning outcomes are based on verbs mainly: the use of adjectives and adverbs and nouns makes our assessment work very difficult (i.e.: how to measure the word 'mastery'?). The measurement of real behaviours of the trainees is mainly based on verbs.

The competence "Ability to anticipate", should be considered, specially at level 6. (see the Consultation Package document)

Though the LO examples are appropriate to the sector, the LO "competence" should include a stronger behavioural component. Attitudes such as proactivity, resilience, flexibility, dealing with unexpected situations, leadership mainly at higher levels, etc. should be represented as comportamental /competence LO instead of having examples only that only link competence with processes.

Levels 3 and 4 fit the commercial area, competences that fit those who are in touch with the clients; levels 5 and 6, concern the adequate competences to work in the financial area - experts, leaders and team managers. In other words, level 3 corresponds to a commercial profile; level 4 corresponds to banking manager profile; level 5 to experts in financial areas (credit, asset management, etc.), level 6 corresponds to the financial areas responsible.

Comparing qualifications (its LO) within the sector, with their Translator's LO, we realise that they do not contemplate some sub sectoral LO, such as for instance insurance, investment and financial services.

yes but with missing elements on the soft skills /competence, mainly at level 6.

It still requires a certain mental conceptual perception shift in the heads of the beneficiaries to ensure actual use.

Comparing the Translator LO with some existing qualifications LO, there are some gaps.

The examples of LO are appropriate to the sector, though in general the list of soft skills / behaviours should be more complete. The focus of the “competences” should go to people and not processes. Soft skills represent a strong differentiator when working for the banking sector”.

On the higher-level better understanding of system risks is essential.

For banking sector YES, but there is a need of consultations with other representatives of the sector (e.g. insurance, pensions, brokerage houses, financial brokers).

Descriptions are on a certain general level and on this level I assume they are adequate.

Too much stress on innovation, too little on problem solving and decision taking

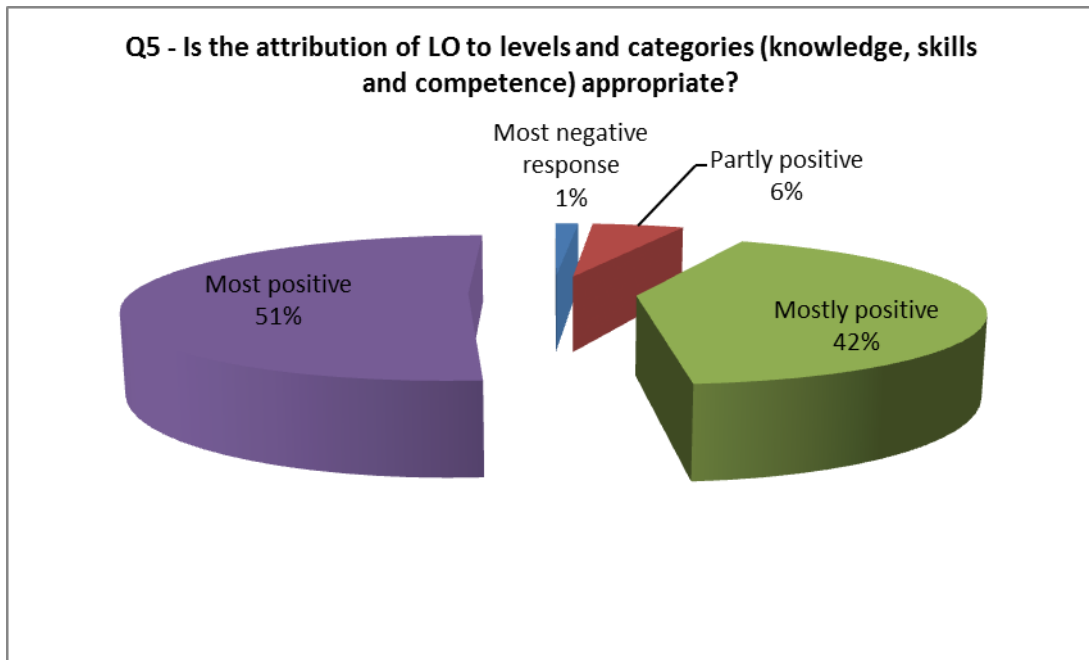
It is not an easy task to map the manifold tasks in the financial sector; sometimes the examples are quite general but they fit with the variety of tasks; given the complexity of tasks the examples of LO are highly appropriate. It is recommended to further differentiate the LO according to dominant profiles in certain organizational departments. On level 6 some of the qualifications (concerning leadership) will not be fully deployed immediately after graduation but will be shaped only after some years of practical experience. For level 5 the following description is not appropriate although it might be in line with the EQF descriptor: “recognizes situations when to seek support information and advice”; at his level it is expected to act more proactive and forward-looking.

Shouldn't really comment as not in sector but seem relevant to me.

The examples of LO are appropriate but more examples are recommended.

**5. Is the attribution of LO to levels and categories (knowledge, skills and competence) appropriate?**

93% of very positive and positive feedback. Some doubts on the right progression in the knowledge category (level 4 and 5 given as an example) are expressed.



**Remarks:**

the attribution seems interesting. Please note that, in our experience, it is quite impossible to have the same approach and rules for attributing LO to levels so as LO to K+S+C

It was considered useful to strengthen the 'attitude' content of each competence level - as we have to take into consideration that qualifications in the FSS increasingly depend on the behavioral aspect.

It represents a basis of reference for the Financial Sector which helps possible comparison and equivalence among sectoral qualifications.

It makes sense to follow the European Qualification Framework structure to build the "translators" for the FSS and use the most significant levels to describe the qualifications of the sector.

"When comparing vertically the EQF level descriptors, it becomes less clear the progressive increase in complexity and depth of the LO. For instance, it is observed a greater degree of depth/complexity of Knowledge in level 4 when compared to Level 5:

- ◆ Level 4 – “Explains the FS business processes, practices and the related regulator, legal and corporate governance requirements”;
- ◆ Level 5 – “Identifies and illustrate those laws, regulations and procedures which are relevant to his/her role”."

The attribution of LO to levels is appropriate and evolves cyclically.

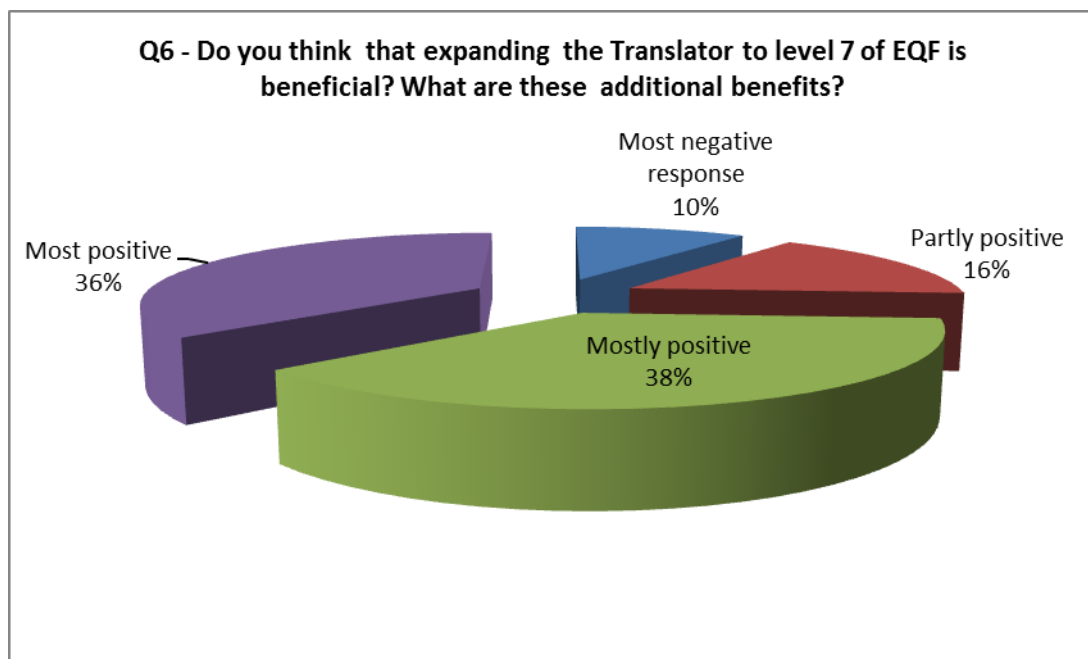
All in all, the translator is appropriate both in horizontal terms (relationships between knowledge, skills and competences) as well as in vertical terms (demarcation and sequence of levels)

Similar to SCQF definitions

Yes, the attributes of the LO to levels and categories of knowledge, skills and competence are there.

**6. Do you think that expanding the Translator to level 7 of EQF is beneficial? What are these additional benefits?**

*26 % think that expanding it is rather not beneficial furthermore written comments strongly suggest to concentrate on the key levels.*



Remarks:

The banking population seems to be more and more qualified. Therefore, the masters degree or equivalent are becoming common. In a future perspective we could benefit from having some advanced work done concerning the translator for level 7.

The financial sector is highly specialized, both technologically and technically, being at the forefront of these areas. Furthermore, it is a sector that requires specialized skills, innovation capacity and knowledge among several interconnected areas. The additional benefits result from highly specialized skills identification.

It may add some useful information about technical and specific Knowledge

Most of our training positions in level 5&6

Level 7 Translator can be beneficial because people working in the Sector are becoming more and more qualified. This level represents highly specialised skills

It is more important to try to apply the existing EQF and the implementation of these FSS EQF translator, than expanding the proposed on a level 7.

It is advisable to add level 7 to the Translator, which in my opinion is related to top management. This group is a creator of the operations of financial institutions, responsible for the problems of 2008-2009. I think that nowadays the pace of development of employees and adjustment of training institutions, and also possibility of gaining international experience is a clear signal that soon we will have exceptional specialists, with unique knowledge and skills above level 6.

It might be considered, but we should have in mind that including a next level can disturb a present description of particular EQF levels. I assume that level 7 would reflect competences, skills and experience of executive director of a certain business area, while a present level 6 competences of chief officer and department director. In a present approach we do not have such a distinction. It will be also more difficult to assign certificates to particular qualification levels.

I cannot see benefits.

Possibly yes. It would refer to board members of financial institutions.

Adjustment to a particular institution, its culture and structure.

At this stage I suggest to focus on activities within levels 1-6, and then decide about level 7.

Translator on level 6, in my opinion, is sufficient for requirements of supervising positions. Including another level might be something not existing in reality.

This expansion can be done after a round of consultations within the banking environment and in close connection with the international banking market.

As long as employers' representatives agree with this description, the 7 EQF level must be included.

We do not believe that expanding the Translator to Level 7 of EQF would be beneficial at the moment.

Seems especially useful for individual career planning

Depends on the target market size at L7 as to worthwhile or not

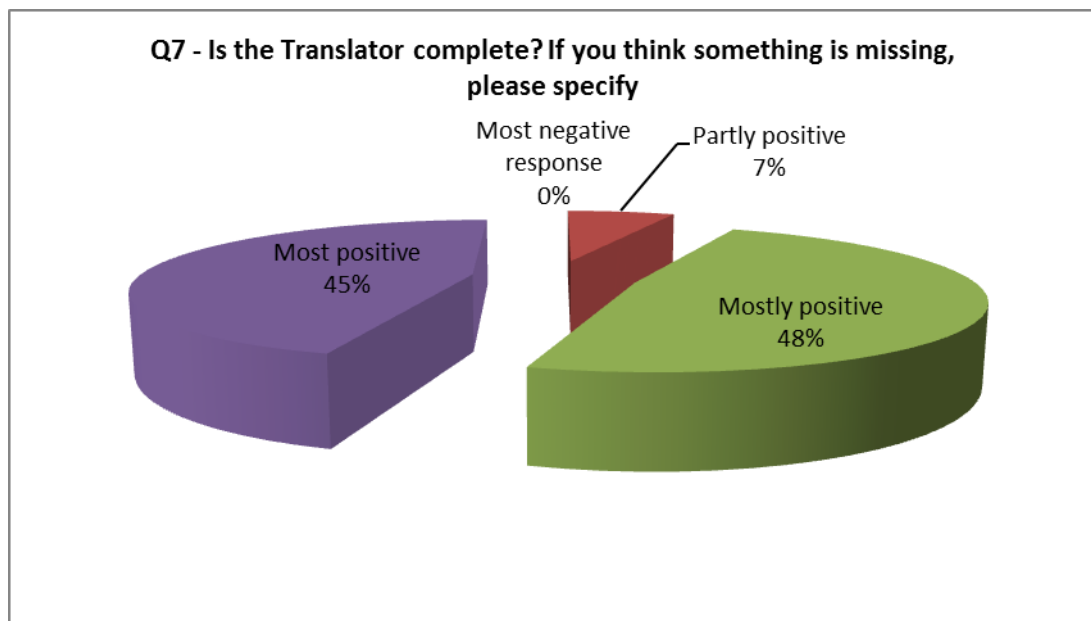
Can't comment as not in sector

It will bring Post Graduate qualifications into the equation

There is a mixed response as to how this can be applied in reality. But masters level is beneficial for specialized roles in the FS industry.

**7. Is the Translator complete? If you think something is missing, please specify.**

*Very positive feedback. The client centric differentiator (covering products and services) is seen as very very important in addition there are specific request to include forecasting on level 6, ethics on level 3.*



Remarks:

a differentiator specifically dedicated to products and services seems very useful

the differentiator 'client centric' was deemed to be very important for the FSS Translator - and we were asked to put it back in

The behavioural /competences LO could be more explored as they are highly important competences for people working in the sector. These LO are the most relevant ones, as the Degree is not a differentiated factor.

Need access to other sectors' EQF to expand EQF Vocabulary.

A differentiator specifically dedicated to products and services seems very useful

On the macro-micro economic environment and financial markets; on level 6, I would add on Skills, something like: *Is able to forecast (or analyze other's forecast) of key economic variables, in order to build and/or rebalance the client's portfolio.*

In level 3 in competences I would extend the description about professional ethics. I like the description from level 4.

In general, the interviewees felt that the translators capture the essence of the fs industry but there was one comment that

From the bank perspective I do not have essential remarks. Although I would like to stress that my opinion is not based on an extensive analysis. I recommend to discuss the tool with the representatives of institutions in financial sector other than banks.

Besides "financial intermediary" I would suggest to add also "financial advisory".

I think that not enough attention is paid to "soft skills", especially on higher levels.

The tool has to be universal, so at the same time it should be to a certain level general. In this aspect it meets the requirements.

For me level 5 is adequate for an expert who knows his job well and is self-dependent. Level 6 is a manager who has a significant impact on the functioning of an institution. For me an intermediate level is missing, which would cover competences, skills and knowledge of directors, team leaders. Maybe a good solution would be to transfer level 6 to 7 and on level 6 describe competences of a director. On level 5 I would replace "creative propositions for clients" by "innovative propositions for clients".

The Translator should make it possible to correlate all the qualifications that are found in this field; why not level 8 ?

It might be useful to include also examples used for preparing the Translator (Professional Banker Certificate, EFCB – European Foundation Certificate in Banking, Commercial Banking Agent,...) in order to make the Translator even clearer.

A major concern is that all soft skills (fx: communication but also IT) and their operationalisation to tasks in banks are missing. On each level, the descriptions of the translator generate the image of an employee working in isolation.

## OPEN QUESTIONS

### What would you add/delete/change in the Translator?

Within the fields dedicated to COMPETENCES, the terms of responsibility and autonomy seem not to arise clearly.

Add soft skills

Level 3: should include reference to quality and improvement in the service to the client. Level 4: this level seems to fit commercial roles, and at this level people are not free to "create"; at least in Portugal the banking products/ financial services are perfectly defined. Also the European Directive on Markets and Financial instruments leaves short margin for creativity. Level 5: Skills: If this level fits the "expertise" in financial areas, in Portugal, it doesn't make sense the skill: "Advises clients on best integrated solutions..." because the experts are not at a commercial level ( have no direct contact with clients); also the Directive on Markets and Financial Instruments should be taken in account. See more comments in the Translator.

Suggestions: 1) To use "verbs" only for the description of Skills and Competences, not for the Knowledge to avoid equivocation between Knowledge and Competences. The Knowledge LO should use instead different levels of deepness: basic Knowledge, fundamental K, deep K or specialized K; 2) The level descriptors of the EQF Translator FSS should follow closely the main ideas of the EQF level descriptors, to ensure closer convergence. In this regard see, for example, the absence of translator to part of competence (level 5): "Review and develop performance of self and others" (EQF descriptor for level 5 – competence).

I think it is sufficiently clear and usable.

Within the fields dedicated to COMPETENCES, the terms of responsibility and autonomy seem not to arise clearly.

I can see no reasons for changes

For skills: more ability to analyse system risks

Necessity to take account of the characteristics of financial institutions other than banks and also an overview of the certificates recognised by the sector and other competence evidences like MBA, postgraduate study.

I would pay more attention/would describe deeper "soft skills"

I would consider only better definition of certain levels, or their simplification to 4 or 5.

All is included

I would explain deeper what are skills and what are competences. In a present version skills are intertwined with competences.

It would be necessary to make a delimitation between the general technical skills and the specialized technical skills.

It would be useful an inclusion, on various levels, of the current qualifications in the field, to see to what extent they correspond with the descriptors and to identify areas for action that are not covered by existing qualifications.

As already mentioned, we think that including also examples used for preparing the Translator, would make it even more understandable

For level 5 the following description seems not appropriate although it might be in line with the EQF descriptor: “recognises situations when to seek support information and advice”; at his level it is expected to act more proactive and forward-looking (fx: to organize a team)

It seems advisable to strengthen communication, networking, teamworking and IT knowledge, skills and competences. Fx: At least on higher levels, communication and networking with local industry is a precondition for credibility and trustworthiness. Thus, these kinds of qualifications are also linking to attitudes.

The translators feel like they concentrate more on the front office of a commercial bank and forgetting the other elements that make the financial industry complete.

### **Do you have any suggestions to improve the current version of the Translator?**

In order to support the understanding of the Translator, a set of qualifications, fully declared through the translator elements, should be provided. The set should clearly declare the public/official value of the qualification/certification (if any).

The soft skills LO could be more complete.

Define as much as possible tangible, concrete outcomes, taking into account the necessity of local completion-i.e. knowledge of local framework.

If qualification is defined in the context of EQF as: *‘qualification’ means a formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards;* I would like to highlight the last paragraph of the “Consultation Document Package” (page 10) in which recalls that the EQF is not meant for occupational profiles or job descriptions. It seems like many FSS EQF translators are more “inspired” on job descriptions than in Learning Outcomes.

The consortium must be very careful in avoiding this mistake, already noted in the document.

I think the Translator is very well prepared. It is a valuable source of ideas to use in the nearest work behind us.

I suggest trying in further work to include in a way existing qualification standards. I think it will be well received by the sector. At the same time remember that we should treat developing of competences as a permanent process in our professional life. If we consider that the effects of this process should be reliable it is required to identify the sources of knowledge. In my opinion we should aim at the accreditation of training institutions (like in case of high schools).

Descriptions in the Translator, although for obvious reasons quite general, are appropriate for this type of a tool.

In the name of Steering Committee of PRMIA Poland I ask for including at level 6 PRM Professional Risk Manager Certificate. Also I identify a need to analyse the possibility of mapping other recognised certificates, like: CIA - Certified Internal Auditor (recommended by the Supervision), CFA - Chartered Financial Analyst, PMP Certification, ACCA.

To use "proficiency" instead of "mastery"

The Translator is transparent. For better understanding I would add that descriptions of higher levels are all from a level below + additionally ... and list.

We think that the Translator is very useful, as we realized that there are difficulties in understanding the differences between certain levels of EQF; like for example the difference between specialized and advanced knowledge (Level 5 and Level 6 of EQF). Therefore we also believe that including concrete examples would make the translator even more understandable.

To improve the practical usage of the translator it is recommended to break down the levels to the different areas of activity / organisational departments in banks; this would support HR departments in their efforts to design employment positions.

An analysis of HR development activities of banks could provide further insights.

## **CONCLUSIVE REMARKS**

Some conclusive remarks can be drawn from a joint analysis of the results of the multiple choices questions as well as the comments provided by the stakeholders who took part in the validation process, keeping in mind that the majority of feedback came from the banks (60%) it emerges that:

- ◆ The Translator was largely approved by stakeholders who took part in the consultations;
- ◆ A positive or very positive feedback on the methodology and the final result;
- ◆ No ground for any major modifications, apart from the following recommendations:
  - ◆ The addition of level 7 would be welcomed;
  - ◆ A better distinction between level 4 and level 5 could be beneficial
  - ◆ Some additional elements of soft skills would be important.
  - ◆ Need to clarify the key principles of the FSS EQF Translator;
  - ◆ Strong effort needed to promote EQF in FSS.

The Translator was revised with the aim of incorporating most of the suggested specific modifications and general requests for adjustments.

## **ADDITIONAL CONSIDERATIONS**

Based on the remarks from the consultation process, the partners discussed further the issue of job profiles approximation vs. EQF levels. A special table was developed to identify some relationships between EQF levels and job profiles, as suggested within the consultations.

The partners identified certain similarities and differences between jobs and qualifications and offered the following considerations:

It is important to underline that the Translator, as EQF itself, is a qualification framework. Thus it is not meant for occupational profiles or job descriptions as such. However, learning outcomes needed for a job might be similar to those composing a qualification. It may happen that a qualification is equivalent to a professional role. Nevertheless, jobs are predominantly more complex, diversified and also more dynamic among organisations than qualifications. They are more descriptive and fine tuned to the needs of a particular organisation. Qualifications tend to be longer lived, and more standardised and prescriptive in nature. They should fit in a variety of organisational contexts. However, the more qualifications will become competence based, the more convergence we should see between jobs and qualifications.

Summing up the correspondence between job profiles and levels of qualifications, the partners underlined that the linkages and intersections are naturally there and they reconfirm the adequacy of both jobs and qualifications and justify their close coexistence. However, they serve different purposes and have different nature and this distinction is important to be preserved. The following table is an attempt to offer an approximation of EQF levels and job profiles that would benefit from qualifications at a given level. Given the diversity of job terminology in different organisations and also organisational structures and dimensions, the partners tried to take account of that in their analysis, offering 3 possible scenarios. It should be also emphasized that given the very early stage of EQF awareness among the FSS stakeholders, this table is a very early attempt to make the correlation between EQF levels and job profiles.

EQF	Jobs profiles Scenario 1	Job profiles Scenario 2	Job profiles Scenario 3
8		CEO	
7		Board members/top management	Executive director for a business area/Chief Officer
6	Financial area: key business executives, team managers in financial areas	Department Directors/ Experts Key	Ddepartment director
5	Financial area: experts (credit, asset mgt.), team managers in commercial areas	Managers	
4	Commercial area: qualified sales force, in touch with clients,		
3	Commercial area: mass market sales force, in touch with clients		