

GROUP — EXECUTIVE BRIEFING

Compliance Posture Briefing

One regime, five houses, five levels of readiness

DOCUMENT	PREPARED	OWNER	PAGES	STATUS
CPB-28-005	January 2028	Group Compliance	6	Illustrative sample

The read

Readiness varies by house and the obligation does not. Two houses are ready, two are partly ready and one has not started, and the group is assessed as a whole — which means the group's position is the weakest house's position.

5 Houses in scope	2 Ready	I Not started	I Position the group is assessed on
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READY

- 01 Two houses with data model and evidence in place.
- 02 Both verified against the requirement.

NOT READY

- 01 Two houses with partial data.
- 02 One house with no programme.
- 03 No group-level view of the aggregate position.



Where the work is done.

THE HOUSE · MCLEUKER HOUSE SET

SO WHAT

A group is assessed as a group. Four houses being ready does not help if the fifth is not, and no reporting currently shows that.

By house

AGAINST THE REQUIREMENT				
HOUSE	DATA MODEL	EVIDENCE	OWNER	VERDICT
House A	IN PLACE	COMPLETE	Named	READY
House B	IN PLACE	COMPLETE	Named	READY
House C	PARTIAL	PARTIAL	Named	PARTLY
House D	PARTIAL	ABSENT	Named	PARTLY
House E	ABSENT	ABSENT	NONE	NOT STARTED



Where it is reported and averaged.

THE GROUP · MCLEUKER HOUSE SET

SO WHAT House E has no named owner, which is why it has no programme. That is the first thing to fix and it is not a compliance problem.



Five houses, one obligation, and an aggregate that hides four of them.

MCLEUKER HOUSE SET

The path

SEQUENCE

NOW	Name an owner in House E Nothing starts without one, and nothing has.
+1 MO	Share House A's data model with C, D and E It exists and works. Rebuilding it four times is the waste.
+3 MO	Group-level readiness reporting So the aggregate position is visible before an assessment.
+6 MO	Re-assess all five Against the same requirement, on the same evidence standard.

WHAT IS NOT ASSUMED

That House A's model transfers	It should, but each house's products differ
That partial means nearly	Partial evidence is not weighted evidence
That the deadline holds	Published, but subject to change — monitored, not assumed
Not assessed	Cost of remediation per house — outside this briefing

SO WHAT	House A has already built a data model that works. Three houses rebuilding it separately is the largest avoidable cost in this document.
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Decisions

DECISIONS ARISING FROM THIS BRIEFING

DECISION	OWNER	BY	IF IT IS NOT TAKEN
Name a compliance owner in House E	Chief Executive	31 Jan	Nothing starts, and the group carries it
Share House A's data model across the group	Group Compliance Director	28 Feb	It is rebuilt three times
Establish group-level readiness reporting	Group Compliance Director	31 Mar	The aggregate position is invisible
Re-assess all five against one evidence standard	Group Compliance Director	30 Jun	Readiness is self-reported and inconsistent

SOURCES AND BASIS

House readiness — internal assessment at the date of this document.
Requirement — published implementing regulation.
Evidence standard — group compliance standard as issued.

ILLUSTRATIVE SAMPLE

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