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COMPLIANCE CONTROL FOR ENSURING THE FINANCIAL SECURITY OF BANKING INSTITUTIONS: STATE, PROBLEMS, PROSPECTS

The **subject** matter of the article is conceptual and applied aspects of the implementation of the compliance control for ensuring the financial security to banking institutions. The **aim** of the study is the complex comprehension of conceptual and methodical approaches to the implementation of the compliance control for ensuring the financial security to banking institutions and the development of practical recommendations for its optimization. The **tasks** are: to systematize approaches to the definition of the compliance control concept for ensuring the financial security to banking institutions; to define the problems of development and legitimation of the compliance control for banking institutions; to study the content, functions and principles of the compliance control for banking institutions; to generalize the features of managing the compliance risk in the banks of Ukraine; to develop the ways for establishing the efficient system of the compliance control for banking institutions and to determine the strategic priorities for ensuring the financial security of banking institutions. The general scientific **methods** were used, in particular, logical generalization, grouping, analysis and synthesis, system analysis, the graphical and analytical method to visualize the results of our research. The following theoretical and practical **results** are received: the problems of development and legitimation of the compliance control for banking institutions were determined; the lack of a unified approach to understanding the social and managerial nature of compliance was proved. The phenomenon of compliance is usually analyzed in social, political, legal and economic dimensions. Consequently, scholars did not succeed in suggesting the universal interpretation of the content of the polysemantic category "compliance". An attempt to systematize approaches for determining the compliance control concept to support the financial security of banking institutions was made. The author's definition of the compliance control concept was suggested and the necessity of its implementation was determined with the obligatory consideration of the specifics of the conditions and the place of its implementation. The content of compliance control was studied and the importance of its introduction was emphasized in the context of the system of detection, identification and neutralization of risks, maintaining positive business reputation, minimizing costs and saving bank assets. The features of managing the compliance risk on the basis of the positive experience of providing compliance control to the reliable bank institutions of Ukraine were highlighted. The lack of clear instructions regarding the efficient system of the compliance control in the banking laws of Ukraine was testified. Therefore, to study the appropriate international theory and practice was suggested. The issues of the organization of the management of banks compliance risks, the operational risk management, the reputation risk management, and so on should be emphasized first of all. **Conclusions:** At present, the development and implementation of the National strategy for ensuring the financial security of banking institutions is of primary importance as well as drafting the Standard Statute on the structural unit for organizing and implementing compliance, introducing the positions of compliance officers and developing job instruction for them, formulating functionally reasoned deontological standards of their professional activity. The nationwide standard of compliance control should be developed under the patronage of the National Bank of Ukraine and the Association of Ukrainian banks.

Keywords: economic security, financial security, the system of the financial security support, compliance control, compliance risks, the National strategy for ensuring the financial security of banking institutions, compliance officer.

Introduction

The foreign capital in domestic banking institutions has led to new approaches to banking business in Ukraine. Leading global banking institutions are expanding opportunities for the domestic banking sector through the introduction of new banking products and services, which contributes to increasing the volume of the client base of banks and increasing their share in the financial market. At the same time, the modernization of the banking sector of the economy causes new difficulties. Thus, the introduction of new banking products and services result in new types of risks. Therefore, the issue of finding innovative approaches to risk management in banking institutions is of great importance. Risk at the level of banking institutions that are considered as credit, operational or legal are inherently the manifestations of the risks of higher levels (macroeconomic and political).

Traditional internal control systems have failed to respond adequately to a wide range of risks. As a result, the current system of risk management requires significant modernization, which includes introducing the effective compliance control as an important component of the financial security system of banking institutions.

The analysis of literary sources and problem setting

Recently, the security systems for financial institutions have been the subject of research by economists and lawyers. The authors mainly focused on the general theoretical issues of organization and implementation of internal control. Some aspects of this problem were considered by D. Malykhin [8], E. Pustovalova E. [9], M. Seleznyev [7], I. Astrakhantsev [10], A. Terekhov [12], V. Senchagov [18], D. Bobylyov [11] and others. At the same time, the analysis of their works shows that there is no tradition of studying the phenomenon of compliance control in the system of supporting the financial security of banking institutions.

The goal and objective of the research

The goal of the study is to understand conceptual and methodological approaches and to develop practical recommendations for the implementation of the compliance control for ensuring the financial security of banking institutions. The objectives of the study are: to systematize approaches to the definition of the compliance control concept for ensuring the financial security to banking institutions; to define the problems of development and legitimation of the compliance control for banking institutions; to study the content, functions

and principles of the compliance control for banking institutions; to determine the features of managing the compliance risk in the banks of Ukraine; to develop the ways for establishing the efficient system of the compliance control for banking institutions and to determine the strategic priorities for ensuring the financial security of banking institutions.

The research material

The Oxford English Dictionary interprets *compliance* as *an action in accordance with a request or command, obedience* [1].

Compliance as a professional activity was initially introduced in western countries and later appeared in Ukraine. This concept was first consolidated in the “Methodological Recommendations on Improving Corporate Management in Ukrainian Banks” approved by the Resolution of the Board of the National Bank of Ukraine dated 28.03.2007 No. 98. This document states that compliance is considered as the activity linked with the requirements of legislation and internal procedures. Compliance was considered through the prism of the need for knowledge, understanding and meeting all the requirements of the current legislation, norms, rules and regulations, internal policies, standards and codes regarding bank activities [4].

The compliance control system is an integrated system for managing compliance risk, which enables identifying the type of risk and monitoring it systematically while ensuring the continuous operation of the bank and minimizing the level of threats that have non-financial nature of bank losses. This system includes the following components: the objects and principles of compliance control; a list of internal banking regulations that ensure the implementation of compliance control; a set of internal bodies of the bank which carry out compliance control [1].

The objects of compliance control are the following:

- managing the conflicts of interest that can arise between the bank and clients, on the one hand, and between the bank and its employees, on the other hand;
- activities related to preventing the bank's activities that contradict the requirements of the current legislation;
- data handling and protection;
- moral and ethical standards.

The main principles of compliance control are the following:

- the principle of investment attractiveness of business for shareholders (a business that does not bear legal risks and risks of the loss of business reputation and image but is economically efficient and competitive);
- the principle of responsibility of the body that performs the functions of compliance control;
- the principle of coverage of all points of sale of financial services (extension of the compliance control documents to all structural units of the bank which sell banking products and provide services);
- the principle of implementation consistency (compliance control as a continuous activity covering all stages of the implementation and realization of business processes);

- the principle of legality (compliance of the bank with the norms of the current legislation that regulates the banking sphere);

- the principle of responsibility (compliance with professional and ethical standards);

- the principle of security (gaining positive experience and the practical use of the best practices in the regulation of processes and procedures) [2].

Internal normative bank documents regulating the implementation of compliance control include the Policy of reporting the bank's problems; The policy of accepting and giving gifts; the Policy defining the procedure for fighting bribery and corruption in the bank; The Policy aimed at counteracting the legalization (laundering) of profits obtained by crime and terrorist financing; The Privacy Policy; The Policy of conflict of interests; The Code of Corporate Conduct and Ethics; The Regulations on managing compliance risk, and so on [1].

The major subjects that carry out compliance control in banking institutions include the bank supervisory board; bank directors; the service of compliance control; other structural units of the bank that are involved in these activities (internal audit of the bank, profile structural units) [3].

The attempts to combine approaches to compliance control are widespread in the scientific literature. These attempts are carried out in sociological, political, legal and economic dimensions.

Considering the category of “compliances”, scientists have not been able to offer a unified interpretation of its essence yet. For example, M.Selezneva believes that compliance can be regarded as the principle of doing business by a financial institution in accordance with the laws, rules, codes and standards established by the competent bodies of public authorities, professional associations and administration of a financial institution [7]. D. Malichin considers compliance as a capability to act in accordance with instructions, rules, special requirements. He notes that the compliance is carried out at two levels in the field of financial services. On the one hand, compliance is carried out according to external rules which should be performed by the organization as a whole, but on the other hand, compliance should correspond to the requirements of the system of internal control that are established to ensure the implementation of external requirements [8]. E. Pustovalova interprets the compliance control as a counteraction to money laundering and terrorist financing, a prevention of market manipulation and dissemination of insider information as well as the fight against corruption [9]. In turn, individual analysts offer a universal definition of compliance as a function of bank management bodies in independent and permanent ensuring the regulatory and legal acts, standards, internal organization documents are followed, in preventing the involvement of the organization in illegal and abusive activities as well as in providing the supervisors and control bodies with timely information [10]. It is difficult to agree with D. Boblyov who understands compliance as an area of professional activity in the financial and banking sphere which involves the performance of official duties, including making decisions at all levels in accordance with the

standards of legality and integrity established by the institution [11].

Compliance builds the foundation for the control of any organization that always operates according to one rule or another. In this context, the compliance is considered as an integral part of a management system which includes the system of internal control [12].

In the recommendations of the Basel Committee on Banking Supervision under the Bank for International Settlements, the term “compliance control” is considered as an independent activity carried out in commercial banks for identifying, assessing, advising, tracking and reporting the bank compliance risks. It is remarkable that compliance risk is considered as the risk of legal liability, financial losses, and reputational losses of a commercial bank as a result of violating the legislation, executive orders, business practices that relate to the commercial activities of the bank [6].

In our opinion, compliance control is a kind of internal control, that is a peculiar process, a set of measures and means aimed at identifying problem situations and monitoring the activities of the banking institution.

It should be noted that the content of compliance control lies in its main functions. Thus, the analytical function involves conducting analytical system procedures for identifying potential compliant risks. The information function involves collecting and processing economic and financial information that characterizes the status of assets and liabilities of the banking institution within the specified period of time. The warning function involves taking measures to prevent unlawful actions from both the bank’s staff and clients. And the function of ensuring the efficient risk management manifests itself in identifying, assessing risks, identifying an acceptable level of risk and neutralizing risks.

Compliance-control functions are implemented in the following areas:

- institutional compliance control which includes activities related to compliance in accordance with the established rules of internal interaction, procedures and decision-making process;
- operational compliance control which includes managing the operations carried out by the bank to identify and assess compliance risks, such as those related to the legalization of profits obtained by crime, terrorist financing, identification of unreliable partners, risks connected with fraud and corruption;
- compliance control of following professional conduct rules including identifying, assessing, and monitoring of compliance risks related to professional business conduct and corporate ethics.

Considering the content of compliance control, its basic principles should be analyzed. Significant attention is paid to the fundamental principles of the implementation of the bank’s compliance function in the recommendations of the Basel Committee on Banking Supervision [6]. This document sets forth the following principles: the responsibility of the bank’s supervisory body; the responsibility of the bank executive body; independence; the availability of resources for the effective implementation of the compliant function;

assistance to the bank executive bodies in the sphere of compliance risks; the interaction with internal audit; international cooperation; outsourcing. The organization of the internal control system should correspond to the following principles: the efficiency and effectiveness; assignment of responsibilities; comprehensiveness; timeliness; independence; confidentiality [5].

In our opinion, a list of the main principles of compliance control should be added by the principles of completeness, consistency, and systematicity.

Recently, the system of compliance control has been widely introduced into domestic banks. It is interesting to consider the experience of the compliance risk management carried out by PAT “OKSI BANK”, which correspond to the highest standards of corporate management. The Bank has established the compliance risk management system and performed the procedures for controlling risks, costs (losses) that happened because the requirements of the legislation were not met, the regulations of the National Bank of Ukraine, internal rules and procedures as well as moral and ethical rules of doing business. In accordance with the approved Regulations on the organization of compliance system in PAT “OKSI BANK” a compliance officer as a responsible person is independent when performing their duties and reports to the bank supervisory board only [13].

When introducing the system of the compliance risk management in PAT “INDEKS BANK” the bank directors applied the following principles:

- the compliance risk management is a key aspect of the activities of Crédit Agricole Group the bank belongs to;
- the rules for implementing the compliance control process are not subject to discussion;
- the team that carries out compliance control is the operating unit that makes decisions on the banking business, attracting new customers, selling banking products, clearing the conflict of interests and issues related to the confidentiality of banking information;
- the system of compliance control does not hinder the development of business, but only ensures its security;
- compliance risk is an integral part of the risk management system in the bank;
- compliance risk management involves systematic control over risky operations, risky amounts of the bank internal activities, customer activities and employee work;
- compliance control rules are simple, but their implementation requires time, and, in some cases, changes in the bank internal culture.

The organizational structural unit that carries out compliance control in PAT “INDEKS BANK” consists of the head of the unit, the department of financial monitoring, the department of deontology and financial monitoring departments at the branches of the bank.

The main tasks of the Department of financial monitoring in PAT “INDEKS BANK” are:

- financial monitoring in accordance with Ukrainian legislation and corporate requirements;
- reporting to public authorities;
- counteracting to legalization and laundering of profits obtained by crime and terrorist financing;

- monitoring the risk of business reputation and the bank image;
- developing and implementing the policy “Know Your Customer”;
- monitoring the completeness of customer identification coverage;
- assessing new products and procedures for their sale.

The competence of the Department of Deontology includes the following issues: the development and implementation of ethical rules; the analysis of malpractice; work with the bank staff; conducting seminars and trainings on risk management compliance; ensuring the rules of conduct with confidential information [14].

PAT “KREDOBANK” has also introduced the system of compliance control. The bank determines the risk as sanctions, financial losses or the loss of reputation or trust in the bank or entities acting on its behalf in accordance with the current legislation, internal normative documents, accepted conduct standards and ethical principles [15].

AT “UkrSibBank” successfully applies the system of compliance control. In its activities, the bank follows

the norms of Ukrainian legislation and international norms and existing international financial sanctions (embargo) and the policy of vigilance. AT “UkrSibBank” established the rules of conduct that should be followed by all employees (act honestly, fairly, professionally and serve the interests of customers). The Procedure of malpractice reporting “Whistle-Blowing” is established and successfully operates in the bank; using this procedure, each employee can inform about any problem or ask Compliance for necessary aid maintaining confidentiality [16].

Summarizing, it should be noted that a number of banks have dramatically decreased in recent years. 180 banks operated in Ukraine as of January 1, 2014, according to the National Bank of Ukraine. But, their number was reduced to 93 banking institutions as of January 1, 2017. The rating of the most reliable domestic banks in 2017 that was presented by the Ministry of Finance of Ukraine [17] gives grounds to state that the majority of them successfully use the system of compliance control.

The financial indicators of banks that occupy leading positions in the rating (according to the National Bank of Ukraine) are given in Table 1.

Table 1. The indicators of banks that occupy leading positions in the bank financial strength rating (according to the National Bank of Ukraine)

Position in the rating	Bank name	Stress resistance										Depositor loyalty										
		Indicators										Points		Indicators				Points				
		Dependence on deposits of individuals		Quality of funding		Profitability		Liquidity		Capital adequacy		The scope of the bank's activities		Total score		The bank's share in the retail deposit market		Absolute growth of retail portfolio of depositors for the quarter		Relative growth of retail portfolio of depositors for the quarter	Experience in the market	
1	Raiffeisen Bank Aval	37,51	3	5	0,56 %	5	29,28 %	5	19,97 %	5	4,4	4,5	4,02 %	5	4,5	3,5	5	5	5	4,6		
2	Crédit Agricole Bank	21,21	5	5	1 %	5	38,74 %	5	8,99 %	3	3,3	4,5	1,39 %	4	2,5	2	5	5	3,7			
3	UkrSibBank	30,64	4	5	2,55 %	4	12,55 %	3	10,33 %	3	3,9	3,9	2,66 %	5	3	2,5	5	5	4,1			

It is evident that the following factors affect the increase of the rating: profitability; liquidity; capital

adequacy; the share of banks in the retail deposit market; absolute growth of the retail portfolio of deposits; relative

retail deposit portfolio. In our opinion, an important additional factor of the efficiency of banking activity is the balanced local system of compliance control.

Clear instructions for the compliant risk management in the banking legislation of Ukraine has not been developed so far. Therefore, banks implement risk management systems without direction.

The development of the efficient system of compliance control in the bank corporate management is based on the identification of compliance risks. The definition of the entire range of risks, both internal and external, that form key indicators to the map of compliance risks occupies the leading place in this process.

The organization of the efficient system of compliance control should be correlated with the practice of foreign banks. A key aspect of the new system of compliance control is the complexity which involves the combination of the bank compliance risk management with the operational risk management and the reputational risk management.

The discussion the research results

It should be noted that the first priority is the development of the legislative basis for the implementation of compliant control systems. Particular attention in the new system of compliance control along with compliant risk management should be paid to the minimization and management of operational risk. Constant monitoring the activities of the bank staff regarding the compliance with the requirements of the legislation and internal regulations will help minimize the risk of using the bank for money laundering and ensure the stability of the reputation of the bank in the market [17].

According to the results of the conducted researches, it has been established that the security of banking systems is crucial for ensuring the normal operation of financial institutions.

A prerequisite for maintaining a long-term competitive advantage is the development of the efficient financial and economic strategy as the main component of the security of banking institutions. V. Senchagov considers the strategy as understanding a set of the most significant decisions and measures aimed at ensuring the adequate level of security of bank operation [18]. A. Alverdov considers the strategy as a set of long-term goals and managerial approaches whose implementation protects the banking institution against potential threats of the violation of commercial and banking privacy as well as hurting the banking property and recourses of a non-monetary nature [19].

Taking into account the specifics of the present development of the banking sector, the factors that affect the implementation of the financial security strategy of banking institutions should be determined, namely: the high level of criminal offences; insufficient qualification of security personnel; insufficient financial support. The objects to be protected are: information that contains banking and commercial secrets; property (mainly monetary funds); bank personnel. Depending on the

composition and specificity of threats, the strategy should be designed taking into account internal and external threats and should include preventive and restrictive measures. The strategy of bank financial security is developed in accordance with the economic standards of the National Bank and should be agreed upon by the general economic strategy and built on the basis of the current regulatory and legislative basis [20].

Conclusions

Thus, it should be noted that the necessity of developing the nationwide Strategy for ensuring the financial security of banking institutions at a centralized level has risen in Ukraine; the implementation of the world and European standards for the implementation of compliance control is particularly emphasized. This approach objectively encourages the implementation of a civilized model of work with customers and staff. In order to reduce the negative impact of threats on the state of banks, the National Strategy should provide a number of such priority measures as:

- conducting a well-considered policy in the field of economic and financial security of banks;
- increasing the efficiency and reducing the cost of banking services;
- strict compliance with banking legislation;
- paying great attention to increasing confidence in the bank, in its advertising, strengthening the transparency of the financial condition of banks;
- conducting a well-considered personnel policy, in particular in the areas of recruitment, training, remuneration and social protection;
- improving the quality of IT support;
- implementing compliance control.

The systematic use of these measures allows banks to remain marketable and solvent and to withstand various threats and to eliminate their consequences autonomously.

The conceptual diagram of developing the strategy for ensuring the financial security of banking institutions with the use of compliance control is presented in Fig. 1.

Also, in our opinion, there is the necessity to develop the Standard Statute on the structural unit (section, department, service) for organizing and implementing compliance in a banking institution.

It seems reasonable to introduce institutions the position of a compliance officer into banking institutions and to include it in the State Classifier of professions DK 003: 2010 specifying qualification characteristics, knowledge, skills and qualification requirements for the position mentioned above. Also, job descriptions should be developed; they should contain the qualification requirements for this category of staff (authority), competence and deontological standards of conduct and professional activity.

Also, it is necessary to introduce normative discipline or special training course "Fundamentals of Compliance control" into the specialized higher educational institutions, which enables developing a holistic and objective view of the role and place of compliance in the activities of banking institutions and

increasing the professional and cultural level of future specialists.

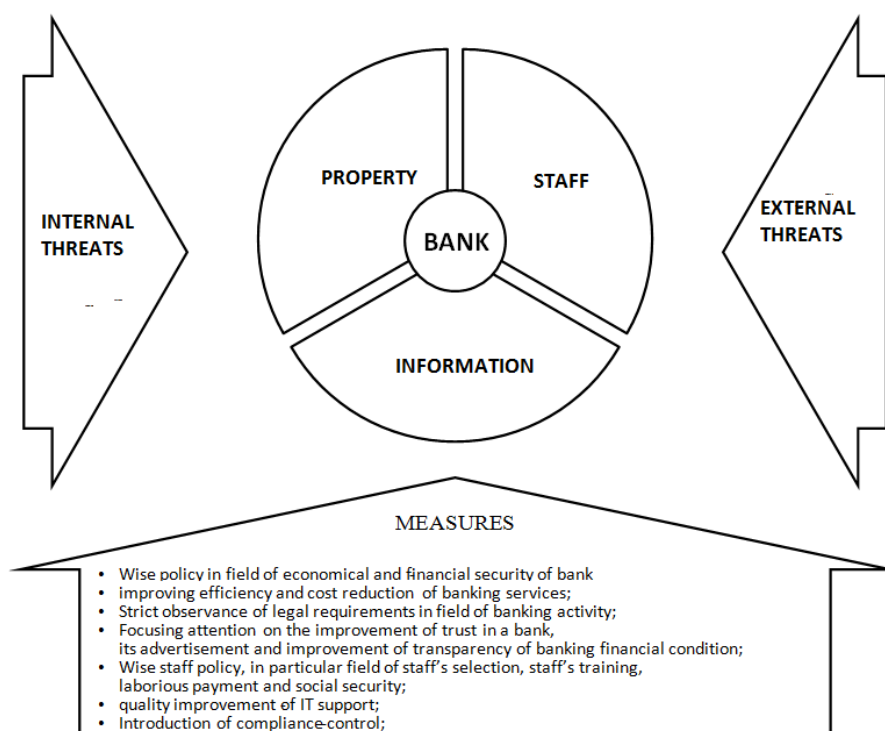


Fig. 1. The conceptual diagram of developing the strategy of ensuring the financial security of banking institutions with the use of compliance control

Taking into account the necessity to increase the social responsibility of banking institutions and the quality of customer service, the skills of specialists (compliance officers) that are authorized to carry out compliance control should be continuously improved. Therefore, interactive classes (trainings, colloquiums, round tables, and so on) should be included in the system of postgraduate training.

In our opinion, a series of national and regional round tables for discussing the topical issues of organization and implementation of compliance control in banking institutions should be initiated; this will contribute to the development of unified algorithms for responding to typical and unusual situations.

Such activities should be carried out under the patronage of the National Bank of Ukraine and the Association of Ukrainian Banks.

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КОМПЛАЄНС-КОНТРОЛЬ У СИСТЕМІ ЗАБЕЗПЕЧЕННЯ ФІНАНСОВОЇ БЕЗПЕКИ БАНКІВСЬКИХ УСТАНОВ: СТАН, ПРОБЛЕМИ, ПЕРСПЕКТИВИ

Предметом дослідження є концептуальні і прикладні аспекти впровадження комплаєнс-контролю в системі забезпечення фінансової безпеки банківських установ. **Мета** дослідження полягає в комплексному осмисленні концептуально-методичних підходів до впровадження комплаєнс-контролю в системі забезпечення фінансової безпеки банківських установ та розробці практичних рекомендацій щодо його оптимізації. **Завдання:** систематизувати підходи до визначення поняття комплаєнс-контролю в системі забезпечення фінансової безпеки банківських установ; визначити проблеми артикуляції та легального закріплення комплаєнс-контролю банківських установ; дослідити сутність, функції та принципи комплаєнс-контролю в банківських установах; узагальнити особливості управління комплаєнс-ризиком в банківських установах України; розробити шляхи організації ефективної системи комплаєнс-контролю в банківських установах та визначити стратегічні пріоритети забезпечення фінансової безпеки банківських установ. Використовуються загальнонаукові методи: абстрактно-логічного узагальнення, групування, аналізу та синтезу, системного аналізу, графіко-аналітичний для візуалізації результатів дослідження. Отримано такі теоретичні і практичні **результати:** визначено проблеми артикуляції та легального закріплення комплаєнс-контролю банківських установ. З'ясовано, що в науковій літературі відсутній єдиний підхід до розуміння соціально-управлінської природи комплаєнсу. Зазвичай феномен комплаєнсу аналізується у соціологічному, політологічному, юридичному та економічному вимірах. Як наслідок, науковці донині не спроміглися запропонувати універсальне тлумачення сутності полісемантичної категорії "комплаєнс". Здійснена спроба систематизувати підходи до визначення поняття комплаєнс-контроль в системі забезпечення фінансової безпеки банківських установ. Запропоновано авторське визначення поняття комплаєнс-контроль та визнана необхідність його запровадження з обов'язковим урахуванням специфіки умов та місця його проведення. Досліджено сутність комплаєнс-контролю і наголошено на важливості його впровадження у контексті ствердження системи виявлення, ідентифікації та нейтралізації ризиків, збереження позитивної ділової репутації, мінімізації витрат та збереження активів банку. Виокремлено особливості управління комплаєнс-ризиком на основі ознайомлення з позитивним досвідом впровадження комплаєнс-контролю в надійних вітчизняних банківських установах. З'ясовано, що в банківському законодавстві України відсутні чіткі інструктивні положення щодо організації ефективної системи комплаєнс-контролю. Тому запропоновано системно дослідити відповідну зарубіжну теорію та практику, першочергово зосередивши увагу на проблемах організації управління комплаєнс-ризиків банку, управлінні

операційним ризиком, управлінні ризиком репутації тощо. **Висновки:** Станом на теперішній час об'єктивно необхідним є розроблення і прийняття загальнонаціональної Стратегії забезпечення фінансової безпеки банківських установ, підготовки Типового положення про структурний підрозділ з комплаєнсу, запровадження посад комплаєнс-офіцерів, розробки для цієї категорії персоналу посадової інструкції та формулювання функціонально обґрунтованих деонтологічних стандартів професійної діяльності. Формування загальнонаціонального стандарту комплаєнс-контролю має здійснюватися під патронатом Національного банку України та Асоціації українських банків.

Ключові слова: економічна безпека, фінансова безпека, система забезпечення фінансової безпеки, комплаєнс-контроль, комплаєнс-ризик, Загальнонаціональна стратегія забезпечення фінансової безпеки банківських установ, комплаєнс-офіцер.

КОМПЛАЄНС-КОНТРОЛЬ В СИСТЕМЕ ОБЕСПЕЧЕННЯ ФІНАНСОВОЇ БЕЗОПАСНОСТІ БАНКОВСКИХ УЧРЕЖДЕНІЙ: СОСТОЯНИЕ, ПРОБЛЕМЫ, ПЕРСПЕКТИВЫ

Предметом исследования являются концептуальные и прикладные аспекты внедрения комплаєнс-контроля в системе обеспечения финансовой безопасности банковских учреждений. **Цель** исследования состоит в комплексном осмыслении концептуально-методических подходов к внедрению комплаєнс-контроля в систему обеспечения финансовой безопасности банковских учреждений и разработке практических рекомендаций по его оптимизации. **Задачи:** систематизировать подходы к определению понятия комплаєнс-контроля в системе обеспечения финансовой безопасности банковских учреждений; определить проблемы артикуляции и легального закрепления комплаєнс-контроля банковских учреждений; исследовать суть, функции и принципы комплаєнс-контроля в банковских учреждениях; обобщить особенности управления комплаєнс-риском в банковских учреждениях Украины; разработать пути организации эффективной системы комплаєнс-контроля в банковских учреждениях и определить стратегические приоритеты обеспечения финансовой безопасности банковских учреждений. Используются общенаучные **методы:** абстрактно-логического обобщения, группировки, анализа и синтеза, системного анализа, графическо-аналитический для визуализации результатов исследования. Получены такие теоретические и практические **результаты:** определены проблемы артикуляции и легального закрепления комплаєнс-контроля банковских учреждений. Выяснено, что в научной литературе отсутствует единый подход к пониманию социально-управленческой природы комплаєнса. Обычно феномен комплаєнса анализируется в социологическом, политологическом, юридическом и экономическом измерениях. Как следствие, ученые не смогли предложить универсальное толкование сущности полисемантической категории "комплаєнс". Осуществлена попытка систематизировать подходы к определению понятия комплаєнс-контроля в системе обеспечения финансовой безопасности банковских учреждений. Предложено авторское определение понятия комплаєнс-контроля и определена необходимость его внедрения с обязательным учетом специфики условий и места его проведения. Исследована сущность комплаєнс-контроля и акцентировано внимание на важности его внедрения в контексте утверждения системы выявления, идентификации и нейтрализации рисков, сохранения позитивной деловой репутации, минимизации расходов и сохранения активов банка. Выявлены особенности управления комплаєнс-риском на основе ознакомления с положительным опытом внедрения комплаєнс-контроля в надежных отечественных банковских учреждениях. Выяснено, что в банковском законодательстве отсутствуют четкие инструктивные положения относительно организации эффективной системы комплаєнс-контроля. Поэтому предложено системно исследовать соответствующую зарубежную теорию и практику, сосредоточив внимание в первую очередь на проблемах организации управления комплаєнс-риском банка, управлении операционным риском, управлении риском репутации и др. **Выводы:** В настоящее время объективно существует острая необходимость разработки и принятия Общенациональной Стратегии обеспечения финансовой безопасности банковских учреждений, подготовки Типового положения о структурном подразделении по комплаєнсу, введение должностей комплаєнс-офицеров, разработки для этой категории персонала должностной инструкции и формулировка функционально обоснованных деонтологических стандартов профессиональной деятельности. Формирование общенационального стандарта комплаєнс-контроля должно осуществляться под патронатом Национального банка Украины и Ассоциации украинских банков.

Ключевые слова: экономическая безопасность, финансовая безопасность, система обеспечения финансовой безопасности, комплаєнс-контроль, комплаєнс-риски, Общенациональная стратегия финансовой безопасности банковских учреждений, комплаєнс-офицер.