

Experience in Innovative Leadership in the Banking Business

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Abstract The paper is aimed at formulating, investigating, comparing and defining the qualitative characteristics and competences of leadership which help to discover the most effective financial strategies that can be applied for promising financial innovations to be used and developed in banking business. The paper investigates the objects and subjects of leadership in financial innovations and risk insurance when the goals of the banking business are realized. It defines the role, experience and possible directions for leadership in innovative technologies and introduction of innovation in the work of banking organizations. It gives an evaluation of the qualitative characteristics and a possible set of competences that a leader should have today to choose innovative strategies in banking business and to do individual, collective and mixed types of brainstorming aimed at picking up financial innovations in a crisis situation. The problem is analysed, the successful experience of banks in forming leaders at all levels of management is considered, some ways are suggested and the need is highlighted to reconstruct the existing further learning system of personnel, which has to rely on the principles of learning about IT technologies and social management. It should make it possible to solve the problems both in terms of socio-psychological interaction with other employees and clients, and the ones concerning mastering new innovative technologies in banking business. The research study was conducted through analysing the data of the Russian Statistics Committee (Rosstat), publications of national and foreign authors on the issues of innovative technologies, and the experience of Sberbank in introducing today's banking technologies and organizational structure transformations, ensuring leadership positions in the banking sector. The suggested ways will contribute to solving the problem of softer adaptation of the banking sector to the growing rates of science-driven technologies introduced with participation of managing leaders at all sections and levels of management of banking business.

Keywords: *leadership, financial strategies, innovation, banking, financial companies*

1 Introduction

The problem of ensuring the leadership positions of the country's banking sector is a very urgent task, which is related not only to very low rates of economic growth of Russia in comparison with the average world level in using, primarily, foreign computer equipment, and the trend for limited use of innovative technologies developed in other countries due to the sanction policy, including double-purpose technologies, but also due to the inflexibility of the banking structures, and a low level of competence of bank employees in terms of innovative banking technologies.

From the analysed statistics and publications on leading foreign and domestic banking structures concerning leadership in managing a banking structure as a whole and its permanent and temporary matrix divisions in particular, suggestions have been made to solve the problem related to selecting, developing and mastering a new innovative banking technology using the leadership resource of the temporary and permanent structures of the

banking organization to accomplish a certain objective on achieving leadership in banking business with a maximum effect both for the bank and its clients, and to improve the status of a bank employee in social life.

Since information technology is ubiquitous and has an innovative nature, there is need for transferring to lifelong learning for a bank employee to have a high professional and qualification level and be able to retrain for new jobs and professions, since some of them are becoming obsolete and dying out, and some new are emerging instead.

All of it calls for urgent measures that the management of banking structures should take to support the material situation, psychological state and educational and qualification level of bank employees to ensure their equal competitive advantages in comparison with other labour market players, and a flexible banking structure that would use the experience and leadership abilities of its workers.

The main objectives of this research are the following:

- to review the publications of national and foreign authors dedicated to the issue of leadership in achieving high professional results in developing and introducing banking innovations;
- to analyse the data on the composition of competences stipulated in the educational standard and qualification reference books of Russia's Ministry of Labour for bank employees and the degree to which they correspond to the developed leadership abilities, interaction methods used in matrix management structures and innovative banking technologies that have been mastered;
- to search for ways to encourage leadership qualities of bank employees at all levels of management, including the principle of equity participation, taking part in competitions, including international ones;
- to give recommendations on organizing training, retraining and further training programs for bank employees given their own limited financial capabilities.

2. Literature review

The requirements for bank employees set by the Central Bank of Russia (Russian banks 2015), two points of view are considered:

- field-oriented higher education is not a must, but an employee must have a learning capacity. Among the management of Russian banks, a little more than 80% have a tertiary education, and the share of managers having two degrees, or an academic title is also high;
- bank specific education is a must, especially for executives. Being a professional help to avoid ill-devised actions, which can have serious consequences not only for the bank but also for its clients. So, higher banking education is much more preferable. At the same time, it is noted that in the opinion of a majority of bank executives, workers aged over 45 are spoiled by the previous system and less capable of innovations and learning.

In the time of a forever changing situation caused by the sanctions and the current legislation, bank employees are always stressed and have to search for innovative solutions, so they need a lifelong learning system both in their professional domain and in dealing with clients.

The work by Rodionov and Zhilyaeva (2017) discusses the capabilities of adopting a special policy encouraging diverse and flexible forms of employment, retraining programs and self-employment opportunities.

The studies by Shestakova (2005, 2006), look into the experience of foreign countries related to employing people in the time when innovations are being introduced and the professional retraining of the former is financed. These processes have a various degree of intensity and their results are not extremely noticeable yet.

The thesis of the report made by Rodionov et al. (2016) says that there is need for interaction between the labor market and the education market.

Lukyanova (2016), looking at the experience of how employment is regulated abroad, notes that it is recommended to keep on forming in-house systems of professional technical education and learning, aimed at improving the labor productivity of employees, give more tax incentives to business to help it create jobs and encourage companies to employ new workers.

The learning issues, including professional training and retraining, specific directions of study programs are discussed in detail and in a quality manner (Wacker and Roberto 2013) and can be used as a basis in Russia. In these terms, the express assessment methodology of starting a project, which was proposed by Finogenova et al. (2018), can be applied to determine the cases when it is reasonable to teach innovative technologies to employees.

The student scholarship program "Alfa-Chance" has been operative since 1995 and embraces 18 large universities in 14 cities of Russia. Every year Alfa-Bank gives a chance to gifted and promising young people to focus on getting new knowledge by providing them with financial support during the first two years of studies (Petersburg online 2019).

The thesis by Onushkina (2005) discusses in detail the quite effective experience of professional education of adult population in France. It is reasonable to use this experience of organizing education in relation to employees of the banking sector in Russia since it implies individualized educational process through making an individual curriculum of the learner jointly with a consulting teacher.

The need for introducing innovative banking technologies in Russia is also preconditioned by the fact that according to Interfax-AFI, in 2017 Moscow and St. Petersburg had 86 spots in the Global Financial Centres Index, leaving behind only Reykjavik and Athens. The index is defined through surveying more than 3,000 professionals. It is an aggregate of indices from five key areas: “business environment”, “financial sector development”, “infrastructure factors”, “human capital”, and “reputation”. In total, Z/Yen considered over 100 cities. (Express-K. 2017).

Knowing the future trends in the field of leadership helps to determine the capabilities for a fast growth of business: increasing complexity of new tasks calls for investigating new qualities of leaders, important for the nearest future, like: research skills, attention, an ability to risk, adapt quickly to changing conditions, and manage changes; innovation revolution is taking place thanks to a common “fuel”- innovation, which calls for open processes aimed at creating innovations, focusing on talent growth, setting programs of motivation and reward for research; a leader should be able to build strong and friendly connections between different divisions inside the company; the art of virtual leadership in the time of globalization implies that managers should have other qualities in comparison with face-to-face leadership. In such a case, the frequency of communications, effectiveness and clearness of messages, in the opinion of over 70% top managers that were questioned, are crucial; authenticity as the highest value of a leader, who plays several roles, such as a manager, a subordinate, a partner, is important for effective problem-solving in complex and uncertain situations and for meeting the expectations of employees and partners; decline in baby-boom and making up the deficit in leaders: developing and implementing a strategic plan for talent development; healthy leadership, based on a balanced diet and a healthy lifestyle; a changing internal structure of organizations and transfer to a more democratic management with a trend of immediate feedback for ensuring that employees’ own interests accord with the objectives of business, including using flexi-worktime, mobility and interest in obtaining short-term benefits “here and now” (Hr portal 2008).

Mayer, director of consumer web products in Google (The village 2013), recommends a formula to build the culture of innovation and cooperation out of several variables: “office hours” for any employee to suggest an idea and creating a “list of ideas”, where everyone can introduce their suggestions; taking risks more often and earlier than others and introducing new projects; maintaining permanent contact with all employees; when teaching others you develop and grow yourself; make your way to the clubs of the Major League, at least to the substitutes’ bench; develop a product relying only on data; fire without feeling guilty.

Kossler and Prestridge (2011) suggest a few methods for improving communication: create the principles of “when” and “how” to communicate; define the ways to document, store and transfer knowledge; use every opportunity to cooperate with teams; create a communication agenda between different teams to set priorities and urgency of messages, convenience of various communication channels. El-Shazly (Pfanshtil 2018) defined the role of a leader in today’s business as an ability to succeed in forever changing conditions, when the previous formula of employees’ loyalty does not work any longer and office life in the context of short-term relations is based on the work of freelancers. Those days when people visited trainings to get a step by step plan for developing leadership qualities are gone. Today’s approach is shifting towards leaders with a high emotional intelligence (Pfanshtil 2018).

Dagaev (2007) defines the requirements for an innovative leader, which include: creativity, broad mind, strive for new knowledge; ability to generate new ideas on one’s own and spot promising ideas of other people; ability to stimulate the company’s employees and experts to come up with new ideas; vision of the major problems of the organization and directing innovative activities at tackling these problems; having a strategic vision, which leads to maximizing cash return from innovations.

The website of Sberbank includes leadership achievements of the new financial strategies that became possible due to two factors:

1. intensive goal-oriented work since 2012 to implement the study program dedicated to management, professional training, skill development designed for workers of all departments, including managers, and front-line employees. Such forms of education include: business games, business cases, business simulations. The “Sberbank-2020” program embraces a single information, communication, innovation, project, educational, and cultural space, including the following organizations: “Student Corporate Union”, “Youth Union”, and “Talent League”, which pursue a common goal of contributing to the development of young talented employees in Sberbank.

Thus, as a result of the projects that were launched, the succession plans have been formed for the key positions in the central office and bank branches, the groups of operative and strategic reserve have been highlighted. The employees are actively developing their leadership qualities and realizing their potential.

2. learning about the new principles of work by the employees divided in the central office into: divided in the central office into squads – self-organizing working groups that consist of 10-15 various profile experts, a sort of mini start-ups; tribes, consisting of squads that work on various directions of products and services. Apart from product tribes, there are also tribes which are aimed at improving platform solutions of Sberbank itself. Each out of four tribes has areas for joint work and includes about 200 people; divisions are headed by managing leaders following the principle of matrix management structures (Sberbank 2019).

Innovations are actively introduced in Sberbank. Its robotics engineering laboratory robotizes the centres dealing with cash transactions, introduces software robots, which can replace people and processes on the basis of RPI-robots and automate processes, including the ones related to taking decisions on giving loans to natural persons. It is a long time since such decisions have been made by algorithm systems, rather than by people. Sberbank has tested a cash-in-transit drone (RIA News 2017).

At the same time, there has been no deep analysis of the reasons preventing advanced training and retraining of bank employees from being organized because of the need for fast introduction of the results of innovative bank technology, and the issues of employment of these people have not been studied.

3. Research results

From these literature sources, considering possible ways of activating leadership positions by the heads of permanent and temporary teams based on the principles of matrix management and aimed at solving a specific innovative task with assigning a new workplace to the employees that were retrained in due time, it should be noted that they can become economically active only provided a special policy is developed and implemented to encourage diverse and flexible employment, retraining programs, search for various forms of stimulation and direct participation in getting dividends in banking business, following the principle of employee-owned enterprises.

In order to understand the degree to which innovative banking technologies influence the ranking of a bank, the data of the Central Bank of Russia have been considered for seven leading banks of Russia for 2019* (see Table 1).

Table 1. Bank ranking by reliability according to the Central Bank for 2019
The table illustrates comparison values of indicator “net assets”

No.	Bank	01.2019 mln. RUR	01.2018 mln. RUR	Change, %
1	Sberbank of Russia	28133766	24192989	16.29
2	VTB	13949419	9676406	44.16
3	Gazprombank	6347699	5642446	12.5
4	National Clearing Centre	3998602	2900364	37.87
5	Russian Agricultural Bank	3467376	3193289	8.58
6	Alfa-Bank	3400207	2673421	27.19
7	Credit Bank of Moscow	2239299	1915685	16.89
16	Bank Saint Petersburg	699451	641112	9.1
35	Absolute Bank	277537	273077	1.63
37	Ural Bank of Reconstruction and Development	261612	310267	-15.68

Source: Simonov (2019)

The data of the credit ranking of the Analytical Credit Rating Agency (ACRA) on some leading banks (Table 2) showed the impact of innovations on a stably high ranking of a bank.

Table 2. Credit reliability ranking “Expert RA”

Name of bank	Ranking	Forecast
VTB Bank	RuAAA	Stable
Gazprombank	ruAA+	Stable
ALFA-BANK	RuAA	Stable

Note: ruAAA – Highest level of creditability/financial security/financial stability; ruAA+ – High level of stability; ruAA – Moderately high level of stability.

Source: Simonov (2019)

Comparative analysis of the rankings of the best Russian banks according to the statistics of the Central Bank of the RF and Moody’s and “Expert RA”, which have high and moderately high creditability ranking, achieved their high positions thanks to the introduction of innovative banking technologies. According to bank ranking experts, “Russia has managed to get ahead many countries by the level of banking digitalization thanks to the fact that the market was formed as late as in the digital era. The average age of a Russian bank since the last business model changed has been eight to nine years, so the banks were able to adapt faster in comparison to the oldest world banks with an established system of classical offline-banking” (Pfanshtil 2018).

PJSC Sberbank and PJSC Alfa-Bank saw in due time the prospects of digital technologies and began competing with payment systems, providers and mobile operators. The Credit Bank of Moscow became one of the largest banks by deposits of natural persons, improved the conditions for ruble deposits, including even the rates of basic deposits. Alfa-Bank is the largest private bank in Russia, which increased the net profit per year by 118.54% and offers one of the most profitable credit and debit cards with cash back. The Russian Agricultural Bank, keeping up with the latest technical fashion trends, has issued an unusual bank card Mastercard RSHB, made in a form of PayRing out of zirconia ceramics. The National Clearing Centre is a highly specialized organization and has been doing clearing on the Moscow stock market. VTB is introducing biometrical identification for its stockholders, increasing considerably the mortgage portfolio, deposits of natural persons and retail crediting (Simonov 2019).

Working based on innovative banking technologies entails a lot of psychological stress so an employee must be quite healthy and able to operate productively all working day. High labour intensity need for perfect eyesight and high culture in communicating both in case of a personal contact or remote servicing calls for creating additional conditions for work and rest. Otherwise, only young people not interested in their professional growth will end up working in banks.

Analysis of innovative banking products used in bank branches which are not included in the first 10 top reliable banks (Tables 1 and 2) in St. Petersburg shows that their introduction, to a large extent, resulted in having younger personnel (Table 3).

Table 3. Innovative banking products used in St. Petersburg bank branches in 2019 (according to the materials of the round table St. Petersburg online 2019)

Bank branches in St. Petersburg	Innovating banking products							
	Big data and blockchain resource-based loan	Mortgage transaction in one day without a bank employee	Make a mortgage loan, order a card off-line	Digital-		Cashback services	Collecting biometrics: voice, fingerprint, retina scan	time-to-market concept as a basis of competitiveness
				banking	office			
A	1	2	3	4a	4b	5	6	7
AKB “Absolute Bank” (public joint stock company)	X	X	X	X				
“Ural Bank of Reconstruction and Development (public joint stock company)	X	X	X	X				
Bank Saint Petersburg (public joint stock company)	X	X	X	X	X			

Source: Own results

There are several notes by the numbers of table columns that need to be made:

1. A special balance platform of the bank can examine a client within 25 minutes and take a decision on the loan application, using big data and blockchain resource rather than a set of documents: what the client does on-line, which websites they visit, what social media they most commonly use.
2. The platform also makes it possible to carry out any mortgage transaction in a day since there is no human factor in the chain. Documents must be filled in, checked in the security department and by the analysts, etc., but all these layers can be minimized by digit.

3. Online, it is possible to make a mortgage loan from a bank, order a card. In addition, this year a project has been started to collect biometrics: voice, fingerprint, retina scan. E-banking is becoming simpler and more comprehensive, so clients tend to use it more actively with novelties being introduced based on the feedback from the clients.
4. One of the important directions is developing digital-office facilities in digital channels. The ranking agencies already differentiate digital-banking (how easy it is for the client to make everyday transactions, for example, to make payments, to view history) and digital-office (operations that made most clients go to the office until recently: for example, registering products, ordering and receiving certificates).
5. Chat-bots based on linguistics and business rules; machine learning; deep learning and neural networks.
6. Using information on the clients as users of a bank card by quantity, frequency and identity of purchased products and services, banks can help their clients by giving them a banking application which allows a client to choose the most suitable seller. It is possible because the bank has a comprehensive knowledge about his clients, their payment activities, information by digital footprint, and contacts in social media.
7. PJSC Sberbank created a federal-scale logistic operator, who develops his own warehouse infrastructure, courier delivery and a chain of pickup points in all regions of Russia. The company of Sberbank ecosystem "SberLogistics" implements technological logistic solutions with uniform service quality standards all over the country and abroad for private and corporate clients [sblogistica.ru]. Its client database allows Sberbank to improve its performance in the context of time-to-market concept. Creating a federal warehouse infrastructure will make high quality storage and fulfilment services available in the key cities of Russia. It has its own courier network and 6 parcel pick-up points (Kurkin 2019).

4. Conclusions

Overall, the review of literature and research studies shows that the attitude to the capabilities of achieving leadership in the process of introduction of scientific advances and innovations has different positions and substantiations. Thus, some sources find it unnecessary to have a high education in banking and thinks that the most important thing is the ability of an employee to learn. In contrast, many others believe that education in banking helps to avoid wrong steps which can have serious negative effects both for a bank and its clients. It is also believed that workers aged over 45 are spoiled by the previous system and less capable of innovating and learning, since in the time of a forever changing situation with the sanctions and current legislation, bank workers are always stressed and have to look for innovative solutions, which calls for the need of a lifelong learning system both in their professional sphere and in client communication. So for the older workers of the bank, opportunities should be considered to develop a special policy encouraging diverse and flexible forms of employment, including outside the walls of a bank, in structures similar to the companies of *Sberbank* ecosystem, like "SberLogistics", which implements technological logistic solutions. Alternatively, retraining programs and possibilities of self-employment should be conceived. In order to determine the cases when it is feasible to teach workers innovative technologies, the express assessment methodology of starting a project can be used. It is reasonable to use the experience of organizing education of banking employees based on individualization of educational process through making an individual curriculum of the learner jointly with a consulting teacher.

It is recommended to use wider the systems of interaction between the labour market and the education market, as it is done by PJSC *Sberbank* and PJSC *Alfa-Bank*. Moreover, PJSC *Alfa-Bank* restricts itself with a student scholarship program, while PJSC *Sberbank* sets the basis for its leadership thanks to two components. On the one hand, it is goal-oriented work to implement the study program dedicated to management, professional training, skill development designed for workers of all departments, including managers, and front-line employees. On the other hand, it is creation of a single information, communication, innovation, project, educational, and cultural space, including organizations that have a common goal of contributing to the development of the most talented young employees and *Sberbank*, as well as searching for gifted student with leadership qualities, which will make it possible to set a foundation for forming the team of the Bank in future.

An important area in getting leadership positions is mastering new operating principles of employees, divided in the central office into squads – self-organizing working groups that consist of 10-15 different profile experts, a sort of mini start-ups; tribes, consisting of squads that work on various directions of products and services. Apart from product tribes, there are also tribes which are aimed at improving platform solutions of *Sberbank* itself. Each out of four tribes has areas for joint work and includes about 200 people; divisions are headed by managing leaders following the principle of matrix management structures.

One of the most important directions for integrating innovations in banking processes is robotization of structures involved in cash transactions, where software robots make it possible to replace people and processes

on the basis of RPI-robots, which make processes automatic, including the ones related to taking decisions on giving loans to natural persons. It is a long time since such decisions have been made by algorithm systems, rather than by people. *Sberbank* has tested a cash-in-transit drone.

The need for introducing innovative banking technologies is preconditioned by the fact that Russia has modest positions in the Global Financial Centres Index, which considers 105 individual factors in the following five key groups of indicators: “business environment”, “financial sector development”, “infrastructure factors”, “human capital”, and “reputation”. All of them in one way or another are connected with the implementation of such leadership trends which help to determine the opportunities for a rapid growth of banking and related business in its infrastructure: open processes aimed at creating innovations, focus on talent growth, programs of motivation and reward for research, flexibility of the internal structure of the bank, transfer to a more democratic management style with a trend of immediate feedback for ensuring that employees’ own interests accord with the objectives of business, including using flexi-worktime, mobility and interest in obtaining short-term benefits “here and now”. The role of a leader in business today is the ability to achieve success in a forever changing environment when the previous formula of employees’ loyalty does not work any longer and office life in the context of short-term relations is based on the work of freelancers.

From these literature sources, considering possible ways of activating leadership positions by the heads of permanent and temporary teams based on the principles of matrix management and aimed at solving a specific innovative task with assigning a new workplace to the employees that were retrained in due time, it should be noted that they can become economically active only provided a special policy is developed and implemented to encourage diverse and flexible employment, retraining programs, search for various forms of stimulation and direct participation in getting dividends in banking business, following the principle of employee-owned enterprises.

Comparative analysis of Russia’s best banks shows that they achieved their high positions due to the introduced innovative banking technologies, leaving behind many advanced countries in terms of digitalization of banking. The banks in Russia began to compete with payment systems, providers and mobile operators.

Working based on innovative banking technologies entails a lot of psychological stress so an employee must be quite healthy and able to operate productively all working day. High labour intensity need for perfect eyesight and high culture in communicating both in case of a personal contact or remote servicing calls for creating additional conditions for work and rest. Otherwise, only young people not interested in their professional growth will end up working in banks.

Analysing the use of innovative banking products in bank branches, even if they do not go into the first tenth in terms of their reliability, it has been found out that they actively introduce into their practice such of them as: loans based on big data and blockchain resource; mortgage transactions in one day without participation of a bank worker; offline mortgage loans, card ordering; using digital banking and office, creating cashback service; collecting biometrics: voice, fingerprint, retina scan; implementing the time-to-market concept as a basis for a bank’s competitiveness; using chat-bots on the basis of linguistics and business rules; machine learning; applying deep learning and neural networks.

Actively using information on the clients as users of a bank card by quantity, frequency and identity of purchased products and services, banks can help their clients by giving them a banking application which allows a client to choose the most suitable seller. It is possible because the bank has a comprehensive knowledge about his clients, their payment activities, information by digital footprint, and contacts in social media, when performing various lateral infrastructural functions, for example, as a federal-scale logistic operator, who develops his own warehouse infrastructure, courier delivery and a chain of pickup points in all regions of Russia for private and corporate clients.

5. Recommendations

The task can be achieved if a set of organizational, financial and information measures are taken, namely:

- conditions should be created to attract potential leaders for direct development and management of the permanent and temporary divisions of a banking organization through applying an internal and external competitive selection, providing a decent salary level, equity participation, various perks and benefits;
- employees of all management levels should be involved in active use of all types of lifelong learning, including during working hours and at their workplace;
- the HR departments of banks should be involved in individualization of the educational process, which is possible through: composing an individual educational plan of an employee jointly with a consulting teacher; creating a portfolio or individual profile, which contains certificates and diplomas, showing the knowledge and skills the learner has; methodological supervision, which includes organizational and attitude approaches and helps the learner together with a consulting teacher to manage the educational process; differentiating the content depending on the test results, which illustrate the level of knowledge and skills accumulated by the learners.

The HR departments of banks should become more active not only in searching for potential employees for vacancies available but also in helping to create new workplaces and projecting the operating results of the temporary divisions by innovative lines of business, which can ensure that the operating results of the temporary divisions are implemented fast in the work practice of all permanent bank divisions.

The social services of banks should be operating within the framework of a special policy that encourages diverse and flexible forms of employment and retraining programs, and possibilities of self-employment.

Banks must be more active in cooperating with the education market at early stages of education. In addition, banks should form their own professional education and learning systems in order to improve the productivity of their employees using the express assessment methodology of starting a project as a way to determine the cases when it is feasible to teach workers innovative technologies

It is necessary to use more intensively quite effective experience of professional education envisaging individualization of the educational process through designing an individual curriculum by the learner jointly with a consulting teacher.

The social service of a bank should provide for one of the major principles of healthy leadership relying on a healthy diet and lifestyle of the managing leaders of both the basic and temporary divisions.

The internal structure of organizations should be systematically changed given the transfer to a more democratic management style with a trend of immediate feedback for ensuring that employees' interests are in accord with the objectives of business, including using flexi-worktime, mobility and interest in obtaining short-term benefits "here and now".

It is necessary to use more widely the operating principle of leaders as freelancers, ensuring success of banking business under forever changing conditions. Moreover, it is recommended to use the positive experience of PJSC Sberbank, which has considerable leadership achievements in its new financial strategy with setting up squads, product and platform tribes, divisions, headed by the managing leaders using the principle of matrix management structures. Further research should be directed in a way to prepare specific methodological guidelines on the introduction of the suggested actions in the activities of banks.

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