

Enjoy your weekend

Dear SMF

We have been notified that you are the person allocated the prescribed responsibility under SYSC 4.7.7 (2) Responsibility for the firm's performance of its obligations under the employee certification regime

We have also been advised that you have adopted an approach whereby the line manager of the Significant Harm Function falling within the Certification Regime conducts the FITness assessment and arranges the issue of the Certificate. In light of this we must remind you of COCON 4.2.1 Specific guidance on senior manager conduct rules; and in particular, SC3: You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.

COCON 4.2.22 G 07/03/2016

Although a senior conduct rules staff member may delegate the resolution of an issue, or authority for dealing with a part of the business, they cannot delegate responsibility for it. It is that person's responsibility to ensure that they receive reports on progress and question those reports where appropriate.

Accordingly we would like to examine, in detail, the following aspects:

- How as SMF responsible for Certification you have established oversight of your responsibilities
- What monitoring controls and reporting you have established
- The quality controls that you have established in respect of aspects that have been delegated
- The sign off processes you have authorised in respect of FITness assessments
- How you have addressed the key general rules relating to the criteria listed in FIT 1.2.1B
- How your processes embrace and support Company Culture, Values, Behaviours and the Code of Conduct
- Your role within any appeals, disputes, FCA notifications or removal of certificates
- How you align oversight with dashboards and scorecards used within SHF business areas

We will be at your offices at 0900 on Monday morning. Enjoy your weekend