Your SMCR Compliance Checklist

The FCA will expect financial services firms to have effective measures in place to ensure compliance with every aspect of the regulation — for now and the future.

Is your firm doing the best it can to fulfill the regulator's expectations?

The Senior Managers Regime

Do your senior managers, who perform Senior Management Functions, have FCA approval?

Do all of your Senior Managers have a Statement of Responsibilities (SoR) which outlines their duties, for which they can be held accountable?

Do you have an effective system that allows you to easily ensure SoRs are up to date?

Are you able to ensure Responsibilities Maps contain the correct information?

Do your SMCR processes allow you to easily monitor, analyse and report on data for complete transparency with the regulator?

Are you able to implement checks and balances to ensure that the required responsibilities are distributed across Senior Managers?

Are you prepared to provide key information and documentation to auditors if necessary?

Does your SMCR process automate activities so that you can save time on establishing an audit trail, be assured that information is accurate, and have full visibility of the actions carried out?

The Certification Regime

Has your firm identified the employees who perform a 'Certification Function' (i.e., those who could cause significant harm to your business, customers, or the financial market)?

Has your firm conducted assessments to ensure that employees in a Certification Function are 'fit and proper' to perform their roles?

Do you have a system in place that enables you to regularly monitor, assess and review all of your firm's SMCR compliance activities, including Certified staff?

Do your processes allow you to keep accurate and up-to-date records for certified persons, as well as Senior Managers?

Do you have a secure central database to hold all SMCR data, such as certificates, records and documentation?

The Conduct Rules and Training

Has your firm identified the staff who will need to abide by the conduct rules and the ancillary staff who do not?

Do you have measures in place to communicate to employees the expected standards of professional behaviour and ensure that they follow this?

Has your firm trained relevant staff in the conduct rules and was this training effective, for example by being tailored to individual roles and responsibilities?

How will you support the training of staff in new processes and policies, and are you able to easily notify them of any changes?

Do you have a central location where all policies and procedures can be documented and stored, as well as distributed across the business?

Do you have a system that enables you to identify policy breaches through a full audit trail, so that you can provide reassurance to senior management and satisfy regulators?

Does your SMCR process allow you to collaborate effectively with other business functions such as HR to ensure breaches are reported correctly?

Is your firm able to store sensitive data securely?

Are you actively working to promote a culture of compliance and good conduct throughout your firm?

✴ FCA Directory of Certified and Assessed Persons

Has your firm identified your Directory Persons (all Certified staff, directors who do not perform SMFs and sole traders or ARs qualified to carry out business with clients)?

Has your firm submitted the necessary information to the directory?

Has your firm established who is responsible for updating the directory, and whether collaboration across departments will be necessary?

Are you able to provide directory reporting consistent with the FCA template, and maintain data and updates?

Do you have a centralised system in place to enable effective collaboration, timely notifications of changes, and real-time updates?

Does your firm have complete oversight that the FCA Directory Persons data obligations are being met in full?

*Best viewed in Adobe Reader or Adobe Acrobat

Struggling to meet any of these checkpoints?
Want to improve the way you approach and maintain SMCR compliance?

Star's Individual Accountability Regime (IAR) solution can maximize your processes, helping you to:

- achieve improved efficiency
- keep things clear and simple with full oversight of your firm
- save time and resources, and ensure compliance year on year

Find out more in our Buyer's Guide, which details how to choose the right SMCR solution for your business and guides you through the process.

Download The Guide

✴ STAR COMPLIANCE