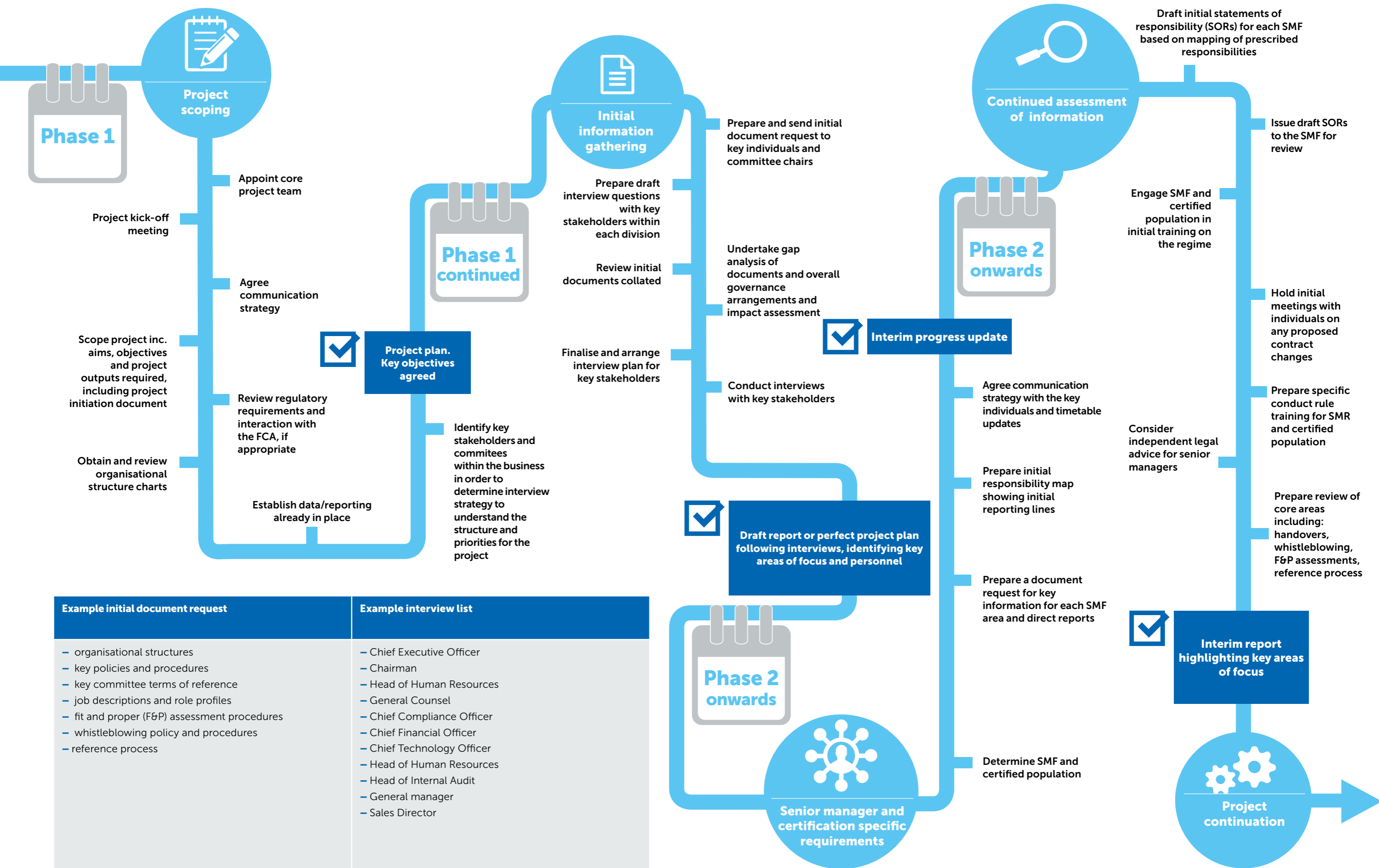


# Senior Managers and Certification Regime Project - the first 100 days



Example initial document request	Example interview list
<ul style="list-style-type: none"> <li>– organisational structures</li> <li>– key policies and procedures</li> <li>– key committee terms of reference</li> <li>– job descriptions and role profiles</li> <li>– fit and proper (F&amp;P) assessment procedures</li> <li>– whistleblowing policy and procedures</li> <li>– reference process</li> </ul>	<ul style="list-style-type: none"> <li>– Chief Executive Officer</li> <li>– Chairman</li> <li>– Head of Human Resources</li> <li>– General Counsel</li> <li>– Chief Compliance Officer</li> <li>– Chief Financial Officer</li> <li>– Chief Technology Officer</li> <li>– Head of Human Resources</li> <li>– Head of Internal Audit</li> <li>– General manager</li> <li>– Sales Director</li> </ul>

# Senior Managers and Certification Regime

The Financial Conduct Authority ('FCA') has made its intention clear that the Senior Managers and Certification Regime (SMCR), which until now impacted the banks, PRA regulated investment firms, building societies and credit unions, will be extended to all firms within the financial services sector in 2018, signalling the end of the Approved Persons Regime. The principle of proportionality will be particularly important as the SMCR is extended to the broader range of firms operating in the financial services industry. This will mean a tailored approach by regulated firms.

## What we can do for you

We can provide pragmatic and sustainable solutions to your SMCR project in the following areas:

- design, delivery and facilitation of Board level awareness workshops (including non-executive directors)
- a governance gap analysis and governance structure review including a review of committee terms of reference
- development of the Responsibilities Map in line with your business model
- assessment of the relevance of the application of business activities and prescribed responsibilities to individual senior managers
- development of the senior managers' statements of responsibility linked to their role profiles
- assessment of the application of the Certification Regime and identification of appropriate "significant harm" or "material risk takers" individuals
- design and delivery of staff training and awareness
- drafting and/or amendments to policies and procedures
- work with your HR and legal teams to bring about the required changes to employee contracts
- provide interim legal and compliance professionals as well as project management resource

We are able to provide an "outsourced" approach to your entire SMCR project, working closely with your project sponsors or provide specific bespoke support, such as reviews of the responsibility map you will be creating.

Our experience and insight gained from the implementation work undertaken for banks and building societies, enables us to provide you with practical guidance on this significant regulatory and people change programme.

## Contact us



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