



Application number or IRN
(for FCA/PRA use only)

Senior Managers Regime: Statement of Responsibilities

This form applies to UK dual-regulated *firms* including EEA and third country branches. It does not apply to *appointed representatives* of SMCR *firms*. Terms defined in either or both of the *FCA Handbook* or *PRA Rulebook* are italicised and should be construed accordingly.

This is a statement provided under section 60(2A) of the Financial Services and Markets Act 2000 (Applications for approval), including a statement revised under section 62A (Changes in responsibilities of *senior managers*).

For *candidates* for approval, this form **must** be submitted as an attachment to a Form A application or a Form E application

For significant changes to an existing *statement of responsibilities*, this form **must** be submitted as an attachment to a Form J notification or a Form I application or variation.

FCA Handbook Reference: SUP 10C Annex 10D

PRA Rulebook Reference: Senior Managers Regime - Applications and Notifications¹

1 October 2020

Name of *individual*
(to be completed by *firm*)

Name of *firm*
(as entered in 2.01)

Financial Conduct Authority
12 Endeavour Square
Stratford
London E20 1JN
United Kingdom
Telephone +44 (0) 300 500 0597
E-mail firm.queries@fca.org.uk
Website <http://www.fca.org.uk>
Registered as a Limited Company in England and
Wales No 1920623. Registered Office as above

Prudential Regulation Authority
20 Moorgate
London
EC2R 6DA
United Kingdom
Telephone +44 (0) 203 461 7000
E-mail PRA-
ApprovedPersons@bankofengland.co.uk
Website www.bankofengland.co.uk/PRA

¹ The relevant section of the *PRA Rulebook* should be referred to depending on which *firm* is applying. For example: CRR firms: Senior Managers Regime - Applications and Notifications; Non – CRR firms: Senior Managers Regime - Applications and Notifications; Solvency II firms: Insurance - Senior Managers Regime – Applications and Notifications; Large Non-Solvency II firms: Insurance - Senior Managers Regime – Applications and Notifications; Non-Solvency II firms: Insurance - Senior Managers Regime – Applications and Notifications

Personal identifications details

Section 1

1.01 Individual Reference Number (IRN)

1.02 Title
(e.g. Mr, Mrs, Ms,)

1.03 Surname

1.04 ALL forenames

1.05 Date of birth (dd/mm/yyyy)

1.06 National Insurance number

Firm identification details

Section 2

2.01 Name of *firm*

2.02 *Firm* Reference Number (FRN)

2.03 a Who should the *FCA/PRA* contact at the *firm* in relation to this *statement of responsibilities*?

b Position

c Telephone

e E-mail



I have supplied further information related to this page in Section 4 YES NO

A *statement of responsibilities* should be drafted to clearly show the responsibilities that the *candidate* or *senior manager* is to perform as part of their *senior management function* and how they fit in with the *firm's* overall governance and management arrangements. A *statement of responsibilities* should also be consistent with the *firm's management responsibilities map*, if applicable. *Small non-directive insurers* and *insurance special purpose vehicles* (ISPVs) are not required to have *management responsibilities maps*.

A *statement of responsibilities* should be drafted in such a way as to be practical and useable by regulators. The FCA and the PRA consider that this would be achieved by succinct, clear descriptions of each responsibility which avoid unnecessary detail. *Firms* have the opportunity to provide details of each responsibility allocated to an *individual* using the free text boxes in this form, however, the PRA and FCA would not usually expect the description of each responsibility to exceed 300 words.

A *statement of responsibilities* must be a self-contained document. There should be one statement per *senior manager* per *firm*. Where an *individual* performs a senior management function on behalf of more than one *firm* within a *group*, one *statement of responsibilities* is required for each *firm*. Any supplementary information may be provided in section 4 (or if submitting electronically, in a **single** attachment). A *statement of responsibilities* must not cross refer to other documents, attachments or links.

A *statement of responsibilities* should include responsibilities held in relation to *FCA controlled functions* that are included in a *PRA controlled function* under SUP 10C.9 (Minimising overlap with the *PRA senior managers* regime).

If the appropriate regulator considers that the *statement of responsibilities* is not sufficiently clear to be practical and usable, it could be challenged as part of a *candidate's* or *senior manager's* application for approval, or in ongoing supervision.

Details of the *individual's* responsibilities should be set out in Sections 3.2 to 3.4, as appropriate:

- Section 3.2 covers *prescribed responsibilities* required by regulators to be allocated to one or more *senior managers*. This section does not apply to incoming EEA branches.
- Section 3.3 covers having overall or local responsibility for each of the business areas, activities, and management functions of the *firm*. This section does not apply to *small non-directive insurers*, ISPVs or incoming EEA branches.
- Section 3.4 covers anything else, not otherwise included, for which a *candidate* or *senior manager* is to be responsible as part of their *FCA* and/or *PRA senior management function(s)*. EEA branches should complete this section to set out any matters for which a *candidate* or *senior manager* is to be responsible as part of their *FCA senior management function(s)*.

3.1 Effective date and relevant Senior Management Functions

3.1.1 Please state the effective date of this *statement of responsibilities*:

Please note that where this is a revised *statement of responsibilities*, i.e. since the granting of the application, there has been a significant change in the aspects of the *firm's* affairs which the *senior manager* is responsible for managing in performing the function (for example, a change in allocation of responsibilities within the *firm*, or the *senior manager* is applying for a new or additional *senior management function*), then this *statement of responsibilities* supersedes any previous versions.

3.1.2 List all *senior management functions* which the *candidate* or *senior manager* is to perform and the effective date the *candidate* or *senior manager* commenced or will commence the performance of their functions.

The table below sets out the full list of *senior management functions* (SMFs). Please refer to the *PRA Rulebook* and *FCA Handbook* for the mandatory SMFs for your *firm*.

Function	Description of a Senior Management Function	UK banks ²	UK branches of EEA banks and insurers	UK branches of non-EEA banks	Credit unions	Solvency II firms & large NDFs	Small NDFs	ISPVs	Small firms in run off	UK branches of non-EEA insurers
SMF 1	Chief Executive	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SMF 2	Chief Finance	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SMF 3	Executive Director	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SMF 4	Chief Risk	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF 5	Head of Internal Audit	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF 6	Head of Key Business Area	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	
SMF 7	Group Entity Senior Manager	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SMF 8	Credit Union Senior Manager				<input type="checkbox"/>					
SMF 9	Chair of the Governing Body	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SMF10	Chair of the Risk Committee	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF11	Chair of the Audit Committee	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF12	Chair of the Remuneration Committee	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF13	Chair of the Nomination Committee	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>				
SMF14	Senior Independent Director	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>
SMF15	Chair of With Profits Committee					<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
SMF16	Compliance Oversight	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

² 'UK Banks' refers to UK banks, building societies and PRA designated investment firms

Function	Description of a Senior Management Function	UK banks ²	UK branches of EEA banks and insurers	UK branches of non-EEA banks	Credit unions	Solvency II firms & large NDFs	Small NDFs	ISPVs	Small firms in run off	UK branches of non-EEA insurers
SMF17	Money Laundering Reporting Officer (MLRO)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMF18	Other Overall Responsibility	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>				
SMF19	Head of Third Country Branch/ Head of Overseas			<input type="checkbox"/>						<input checked="" type="checkbox"/>
SMF20	Chief Actuary					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMF20a	With-Profits Actuary					<input type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMF21	EEA Branch Senior Manager (EBSM)		<input type="checkbox"/>							
SMF22	Other Local Responsibility			<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>
SMF23	Chief Underwriting Officer					<input type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMF23a	Underwriting Risk Oversight (Lloyd's)					<input type="checkbox"/>				
SMF23b	Conduct Risk Oversight (Lloyd's)					<input type="checkbox"/>				
SMF24	Chief Operations	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMF25	Small Insurer Senior Management Function						<input type="checkbox"/>			
SMF26	Head of Small Run-Off Firm								<input type="checkbox"/>	
SMF27	Partner	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	

This *statement of responsibilities* is considered to automatically include the existing legal and regulatory obligations where they exist for these roles and functions. For example, certain specific responsibilities of a

director are set out in company law. Such responsibilities do not need to be recorded in this statement, but any additional responsibilities should be recorded in the sections below.

3.1.3 Please indicate those FCA functions that are included in a *PRA senior management function* under SUP 10C.9 (Minimising overlap with the *PRA* approved persons regime).

SMF	Description	Yes?

3.2 Prescribed Responsibilities

This section deals with those *prescribed responsibilities* to be allocated to one or more *senior managers*. The allocation of responsibilities under a *statement of responsibilities* should not reduce or alter the scope of any applicable *prescribed responsibilities*. EEA branches are not required to assign *prescribed responsibilities* and should leave this section blank.

If the responsibilities that the *candidate* or *senior manager* is to carry out as described in the *statement of responsibilities* go beyond those set out in this section, those additional responsibilities should not reduce or alter the scope of the *prescribed responsibilities* set out in this section.

(FCA SUP 10C.11/PRA: Allocation of Responsibilities)

3.2.1 Please indicate below which of the responsibilities listed are/will be allocated to the *candidate* or *senior manager*, if any, and whether or not they are shared. Different *prescribed responsibilities* apply to different types of *firm* as indicated in the table below.

Note: the form includes references to provisions in the *FCA Handbook* which are also set out in the *PRA Rulebook*, sometimes in slightly different wording. Where this is the case, the underlying provisions should be interpreted as equivalent in substance unless indicated otherwise. Any differences are purely presentational.

If the *individual* has not been allocated a *prescribed responsibility*, please go to Section 3.3.

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
Dual	A	Responsibility for the <i>firm's</i> performance of its obligations under the <i>senior managers regime</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dual	B	Responsibility for the <i>firm's</i> performance of its obligations under the <i>employee certification regime</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FCA	B1	Responsibility for the <i>firm's</i> obligations in relation to individual (a) conduct rules for training; and (b) conduct rules reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dual	C	Responsibility for compliance with the requirements of the regulatory system about the <i>management</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

³ Large CRR *firm* means a CRR *firm* that is not a small CRR *firm* (see SYSC 4.7.5 and the Allocation of Responsibilities Part of the *PRA Rulebook*). This includes UK banks and designated investment firms.

⁴ Small NDFs and Small Run Off firms are treated differently in the PRA Rulebook however for the purposes of this table we have used one column. PRs A and B are FCA only when applied to small run off firms

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		<i>responsibilities map</i>										
FCA	D	Overall Responsibility for the <i>firm's</i> policies and procedures for countering the risk that the <i>firm</i> might be used to further financial crime	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PRA	E	Responsibility for the allocation of all relevant <i>prescribed responsibilities</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>						<input type="checkbox"/>
Dual	F	Responsibility for: (a) leading the development of; and (b) monitoring the effective implementation of, policies and procedures for the induction, training and professional development of all members of the <i>firm's governing body</i>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>					<input type="checkbox"/>
Dual	G	Responsibility for monitoring the effective implementation of policies and procedures for the induction, training and professional development of all of the <i>firm's senior managers/ key function holders</i> (other than	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>					<input type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		members of the <i>firm's</i> governing body)										
PRA	H	Responsibility for overseeing the adoption of the <i>firm's</i> culture in the day-to-day management of the <i>firm</i>	<input type="checkbox"/>				<input type="checkbox"/>					<input type="checkbox"/>
PRA	I	Responsibility for leading the development of the <i>firm's</i> culture by the governing body as a whole	<input type="checkbox"/>				<input type="checkbox"/>					<input type="checkbox"/>
Dual	J	Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of, the internal audit function	<input type="checkbox"/>									<input type="checkbox"/>
PRA	J1	If the <i>firm</i> outsources its internal audit function, responsibility for taking reasonable steps to ensure that every person involved in the performance of that function is independent from the persons who perform external audit, including: (a) supervision and management of the work of	<input type="checkbox"/>									<input type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		outsourced internal auditors; and (b) management of potential conflicts of interest between the provision of external audit and internal audit services.										
Dual	J2	Responsibility for providing for and oversight of the internal audit function, where this function is outsourced to an external third-party provided by a non-significant firms.					<input checked="" type="checkbox"/> ⁵					<input type="checkbox"/>
Dual	K	Responsibility for: (a) safeguarding the independence of; (b) oversight of the performance of, the compliance function	<input checked="" type="checkbox"/>									<input type="checkbox"/>
Dual	L	Responsibility for: (a) safeguarding the independence of; and (b) oversight of the performance of,	<input checked="" type="checkbox"/>									<input type="checkbox"/>

⁵ Applies to Large NDFs and not Solvency II firms

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		the risk function										
Dual	M	Responsibility for overseeing the development of, and implementation of the <i>firm's</i> remuneration policies and practices	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>					<input type="checkbox"/>
Dual	N	Responsibility for the independence, autonomy and effectiveness of the <i>firm's</i> policies and procedures on whistleblowing	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>					<input type="checkbox"/>
PRA	O	Responsibility for managing the allocation and maintenance of the <i>firm's</i> capital, funding (where applicable) and liquidity	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input type="checkbox"/>
PRA	P	Responsibility for the <i>firm's</i> treasury management functions	<input checked="" type="checkbox"/>									<input type="checkbox"/>
PRA	Q	Responsibility for the production and integrity of the <i>firm's</i> financial information and its regulatory reporting	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input type="checkbox"/>
PRA	R	Responsibility for developing and maintaining	<input checked="" type="checkbox"/>									<input type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		the <i>firm's recovery plan, and resolution pack</i> and, where relevant, <u>resolution assessment</u> and for overseeing the internal processes regarding their governance										
PRA	S	Responsibility for managing the <i>firm's</i> internal stress-tests and ensuring the accuracy and timeliness of information provided to the <i>PRA</i> and other regulatory bodies for the purposes of stress-testing	<input checked="" type="checkbox"/>									<input type="checkbox"/>
PRA	T	Responsibility for the development and maintenance of the <i>firm's</i> business model by the <i>governing body</i>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input type="checkbox"/>
PRA	T1	Providing the governing body with an up-to-date business plan and all relevant MI						<input checked="" type="checkbox"/>				<input type="checkbox"/>
PRA	T2	Responsibility for the performance of the <i>firm's</i> Own Risk and Solvency					<input checked="" type="checkbox"/> ⁶		<input checked="" type="checkbox"/>			<input type="checkbox"/>

⁶ Applies to Solvency II firms and not Large NDFs

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		assessment (ORSA)										
PRA	U	Responsibility for the <i>firm's</i> performance of its obligations under <i>Fitness and Propriety</i> (in the <i>PRA Rulebook</i>) in respect of <i>notified non-executive directors</i> and those who perform a <i>key function</i> (where applicable for insurers)	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
PRA	V	If the <i>firm</i> carries out <i>proprietary trading</i> , responsibility for the <i>firm's proprietary trading</i> activities	<input checked="" type="checkbox"/>									<input type="checkbox"/>
PRA	W	If the <i>firm</i> does not have a <i>person</i> who performs the <i>Chief Risk function</i> , responsibility for the compliance of the <i>firm's</i> risk management systems, policies and procedures with the requirements of Risk Control 2.1 to 2.4 of the <i>PRA Rulebook</i> .	<input checked="" type="checkbox"/>									<input type="checkbox"/>
PRA	X	Responsibility for the <i>firm's</i> performance of its obligations under the Outsourcing part of the <i>PRA Rulebook</i> (for CRR and non CRR <i>firms</i>),	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		<i>Conditions Governing Business 7 (for SII firms and third country branches) or Non-solvency II firms: Governance 5 (for large NDFs)</i>										
PRA	X1	Responsibility for the <i>firm's</i> performance of its obligations under Internal Governance of Third Country Branches 7.			<input type="checkbox"/>							<input type="checkbox"/>
PRA	Y	If the <i>firm</i> is a ring-fenced body, responsibility for ensuring that those aspects of the <i>firm's</i> affairs for which a person is responsible for managing are in compliance with the <i>ring-fencing obligations</i>	<input type="checkbox"/>									<input type="checkbox"/>
FCA	Z	Overall responsibility for the <i>firm's</i> compliance with CASS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Dual/PRA	AA	Responsibility for implementing (where applicable) and management of the <i>firm's</i> risk management policies and procedures		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
PRA	BB	Responsibility for managing the systems and controls of the <i>firm</i>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
PRA	CC	Responsibility for managing the <i>firm's</i> financial resources		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input type="checkbox"/>
PRA	DD	Responsibility for ensuring the <i>governing body</i> is informed of its legal and regulatory obligations		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input type="checkbox"/>
Dual	EE	Responsibility for escalating correspondence from the <i>PRA, FCA</i> and other regulators to the appropriate governing or management bodies			<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Dual	FF	Responsibility for the <i>firm's</i> compliance with the <i>UK regulatory system</i> applicable to the firm			<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
PRA	GG	Responsibility for the oversight of systems and controls, along with risk management policies and procedures, that are proportionate to the nature, scale, and complexity of the risks inherent in the						<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>

FCA/PRA/Dual PR	Ref	Prescribed Responsibility (PR)	Large CRR firms ³	Small CRR firms	Third country CRR firms	Credit unions	Solvency II firms and Large NDFs	Small NDFs & Small run off firms ⁴	Third Country branches of insurers	UK ISPVs	Swiss General Insurers	Is this PR shared between senior managers
		<i>firm's</i> business model.										
PRA	HH	Responsibility for management of the <i>firm's</i> liquidity or, where a liquidity waiver is in place, the submission of information to the PRA on the <i>firm's</i> liquidity position			<input type="checkbox"/>							<input type="checkbox"/>

3.2.2 If necessary, please provide additional information about each *prescribed responsibility*, including:

- a breakdown of the different components and tasks which the responsibility encompasses; and
- if applicable, details of any sharing arrangements including, if known, the name(s), IRN(s) and/or job title(s) of the *individual(s)* with whom the *candidate* or *senior manager* is or will be sharing this *prescribed responsibility*. The responsibility should be recorded in the same way in the statements of responsibilities for each *individual*.

Additional information must be relevant, succinct and not dilute or undermine the *prescribed responsibility*.

Ref	Prescribed Responsibility	Further Relevant Details



I have supplied further information
related to this page in Section 4

YES

NO

3.3 Overall or Local Responsibility

This section deals with having overall or local responsibility for any of the business areas, activities, or management functions of the *firm*. Section 3.3.1 applies to *UK SMCR banking firms*, Solvency II insurers and *large non-directive insurers*. Third country branches should apply the local responsibility requirement and complete Section 3.2.2 instead.

3.3.1 Overall Responsibility

By overall responsibility we mean the ultimate responsibility (under the *governing body*) for managing or supervising that function, and primary and direct responsibility for briefing and reporting to the *governing body* about that function and putting matters for decision about that function to the *governing body* of the *firm*.

If the *individual* has overall responsibility for any or part of the business areas, activities, or management functions of a *firm*, please provide details of each in the table below.

Where responsibilities are shared (for example, a responsibility may be shared as part of a job share or where departing and incoming *senior managers* work together temporarily as part of a handover), please provide details of any sharing arrangements including, if known, the name(s), IRN(s) and/or job title(s) of the individual(s) you are sharing this responsibility with. The responsibility should be recorded in the same way in the *statements of responsibilities* for each *individual*.

If the *individual* does not have overall responsibility for a business area, activity or management function of the *firm*, please go to Section 3.4.

A *firm* may wish to refer to SYSC 25 Annex 1G (replicated in Annex A of this form) to help it make sure it has not failed to allocate overall responsibility for a particular activity of the *firm*. Please note that the *FCA* does not require *firms* to organise themselves by the functions in SYSC 25 Annex 1G, and that the Annex is not comprehensive. It is important that a *firm* does not fail to allocate overall responsibility for business areas, activities and management functions, in line with SYSC 26.

Please provide a title for this overall responsibility	Please provide further details of this overall responsibility.	Is this overall responsibility shared? If 'Yes' please provide the name(s), IRN(s) and/or job title(s) of the <i>individual(s)</i> you are sharing this responsibility with (where known)
		Yes / No
		Yes / No
		Yes / No
		Yes / No

3.3.2 Local Responsibility

Local responsibility is explained in SYSC 26. In summary, by local responsibility we mean:

- a) for a *person* who is allocated local responsibility under SYSC 26, ultimate responsibility (under the *governing body* of the *branch*) for managing or supervising that function and primary and direct responsibility for briefing and reporting about that function to the *branch's governing body* or equivalent and for putting matters for decision about that function to the *branch's governing body* or equivalent. SYSC 26 states that, in general, the *FCA* expects that a *person* to whom overall responsibility for a function is allocated under SYSC26) will be the most senior employee or officer responsible for managing or supervising that function under the management of the *branch's governing body*;

- b) for a *person* who is allocated local responsibility under SYSC 26, a *person* who is directly involved in the management of the relevant activity, business area or management function. SYSC 26 states that, the *FCA* expects that a *firm* appointing someone to have local responsibility for a function under SYSC 26 will appoint the most senior employee or officer of the *firm* with responsibility for that activity, business area or management function.

If the *individual* has local responsibility for any or part of the activities, business areas or management functions of a branch, please provide details of each in the table below.

Where responsibilities are shared (for example, a responsibility may be shared as part of a job share or where departing and incoming *senior managers* work together temporarily as part of a handover), please provide details of any sharing arrangements including, if known, the name(s), IRN(s) and/or job title(s) of the *individual(s)* you are sharing this responsibility with. The responsibility should be recorded in the same way in the statements of responsibilities for each *individual*.

If the *individual* does not have local responsibility for an activity, business area or management function of the branch, please skip this section.

A *firm* may wish to refer to SYSC 25 Annex 1G (replicated in Annex A of this form) to help it make sure it has not failed to allocate local responsibility for a particular activity of the *firm*. Please note that the *FCA* does not require *firms* to organise themselves by the functions in SYSC 25 Annex 1G, and that the Annex is not comprehensive. It is important that a *firm* does not fail to allocate local responsibility for business areas, activities and management functions, in line with SYSC 26.

Please provide a title for this local responsibility	Please provide further details of this local responsibility.	Is this local responsibility shared? If 'Yes' please provide the name(s), IRN(s) and/or job title(s) of the <i>individual(s)</i> you are sharing this responsibility with (where known)
		Yes / No
		Yes / No
		Yes / No
		Yes / No



I have supplied further information related to this page in Section 4

YES

NO

3.4 Other Responsibilities

3.4.1 Please set out below any additional responsibility, not otherwise recorded in this statement, for which a *candidate* or *senior manager* is to be responsible as part of their *FCA* and/or *PRA senior management function(s)*. For example, responsibilities outside the normal course of business such as those linked to high profile projects or initiatives.

EEA branches should use this section to set out below anything for which a candidate or *senior manager* is to be responsible as part of the *FCA* senior management function(s) role.

Where responsibilities are shared (for example, a responsibility may be shared as part of a job share or where departing and incoming senior managers work together temporarily as part of a handover), please provide details of any sharing arrangements including, if known, the name(s), IRN(s) and/or job title(s) of the *individual(s)* the *candidate* or *senior manager* will be sharing this responsibility with. The responsibility should be recorded in the same way in the *statements of responsibilities* for each *individual*.

Please provide a title for this other responsibility	Please provide further details of this other responsibility	Is this other responsibility shared? If 'Yes' please provide ,the name(s), IRN(s) and/or job title(s) of the <i>individual(s)</i> you are sharing this responsibility with (where known)
		Yes / No
		Yes / No
		Yes / No
		Yes / No



I have supplied further information related to this page in Section 4

YES

NO

4.1 Is there any other information the *individual* or the *firm* considers to be relevant? YES NO

If yes, please provide details below or on a separate sheet of paper and clearly identify the section and question to which the additional information relates.

Question	Information

4.2 How many additional sheets are being submitted?

ANNEX A

SYSC 25 **The main business activities and functions of an *SMCR firm***
Annex 1G

Business areas and management functions	Explanation
(1) Payment services	<p>This means:</p> <p>(1) <i>payment services</i>;</p> <p>(2) issuing and administering other means of payment (for example, cheques and bankers' drafts);</p> <p>(3) issuing <i>electronic money</i>; and</p> <p>(4) current accounts.</p>
(2) Settlement	<p>This means clearing and settlement of any transactions described in rows (3) and (6) to (9) of this annex in relation to the assets covered by (9).</p> <p>It also includes clearing and settlement of any transactions described in row (10).</p>
(3) Investment management	<p>This has the same meaning as <i>managing investments</i> with the following adjustments:</p> <p>(a) it covers all types of assets; and</p> <p>(b) the exclusions in the <i>Regulated Activities Order</i> do not apply.</p> <p>It also covers fund management.</p>
(4) Financial or investment advice	This includes <i>advising on investments</i> .
(5) Mortgage advice	This has the same meaning as <i>advising on regulated mortgage contracts</i> but is expanded to cover land anywhere in the world and to cover security of any kind over land.
(6) Corporate investments	This means acquiring, holding, managing and disposing a <i>firm's</i> investments made for its own account.
(7) Wholesale sales	<p>This means the <i>selling</i> of any <i>investment</i> to a <i>person</i> other than a <i>retail customer</i>.</p> <p>It does not include the activities in (1).</p>
(8) Retail sales	<p>This means the <i>selling</i> of any <i>investment</i> to a <i>retail customer</i>.</p> <p>It includes savings accounts. It does not include the activities in (1).</p>
(9) Trading for clients	This means <i>dealing in investments as agent</i> and <i>execution of orders on behalf of clients</i> but the list of products includes money market instruments and foreign exchange.
(10) Market making	This has the same meaning as it does in <i>MIFID</i> (see the definition of market maker in article 4.1(7)).
(11) <i>Investment research</i>	

Business areas and management functions	Explanation
(12) Origination/syndication and underwriting	<p>Origination and syndication include:</p> <p>(1) entering into or acquiring (directly or indirectly) any commitment or <i>investment</i> with a view to transferring some or all of it to others, or with a view to others investing in the same transaction;</p> <p>(2) sub-participation; and</p> <p>(3) any transaction described in the <i>Glossary</i> definition of <i>originator</i>.</p> <p>Underwriting includes underwriting that is not on a firm commitment basis.</p> <p>A commitment or <i>investment</i> includes an economic interest in some or all of it.</p> <p>This activity also includes the provision of services relating to such transactions.</p>
(13) Retail lending decisions	<p>Deciding whether, and on what terms, to lend to <i>retail customers</i>.</p> <p>Lending includes granting credit, leasing and hire (including finance leasing).</p>
(14) Wholesale lending decisions	<p>Deciding whether, and on what terms, to lend to <i>persons</i> who are not <i>retail customers</i>.</p> <p>Lending includes granting credit, leasing and hire (including finance leasing).</p>
(15) Design and manufacturing of products intended for wholesale customers	<p>Wholesale customers mean <i>persons</i> who are not <i>retail customers</i></p>
(16) Design and manufacture of products intended for <i>retail customers</i>	
(17) Production and distribution of marketing materials and communications	<p>This includes <i>financial promotions</i></p>
(18) Customer service	<p>This means dealing with <i>clients</i> after the point of sale, including queries and fulfilment of <i>client</i> requests</p>
(19) Customer complaints handling	<p>This includes the <i>firm's</i> compliance with <i>DISP</i>.</p> <p>It also includes:</p> <p>(1) any similar procedures relating to activities that do not come under the jurisdiction of the <i>Financial Ombudsman Service</i>;</p> <p>(2) activities that take place outside the <i>UK</i>; and</p> <p>(3) activities that are not subject to any ombudsman service.</p>

Business areas and management functions	Explanation
(20) Collection and recovering amounts owed to a <i>firm</i> by its customers Dealing with customers in arrears	“Customer” means any <i>person</i> falling into any of the definitions of <i>client</i> in the <i>Glossary</i> so far as they apply to the <i>FCA’s Handbook</i> . The definition is extended to cover all services provided by the <i>firm</i> and not just those that are provided in the course of carrying on a <i>regulated activity</i> or an <i>ancillary service</i> .
(21) Middle office	This means risk management and controls in relation to, and accounting for, transactions in <i>securities</i> or <i>derivatives</i>
(22) Issuing Commitments	This means the activity described in SYSC 27.7.6R(1)(i) (examples of what the significant management <i>FCA-specified significant harm function</i> can cover)
(23) Processing	This means the activity described in SYSC 27.7.6R(1)(j) (examples of what the significant management <i>FCA-specified significant-harm function</i> can cover).
(24) Human resources	This includes recruitment, training and competence and performance monitoring
(25) Incentive schemes for the <i>firm’s</i> staff	This is not limited to schemes based on sales.
(26) <i>Providing information in relation to a specified benchmark</i>	
(27) <i>Administering a specified benchmark</i>	
(29) Administration of insurance	This means the activity described in SYSC 27.7.6R(1)(k) (examples of what the significant management <i>FCA-specified significant harm function</i> can cover).
Note (1): The purpose of this annex is explained in SYSC 25.7 (Guidance about SYSC 25 Annex 1G) and SYSC 26.11.2G	
<p>Note (2): A <i>firm</i> does not have to use the split of example activities in this annex for the purposes in Note (1). If a <i>firm</i> does decide to use it, the <i>firm</i> should adapt it to suit the <i>firm’s</i> management arrangements better.</p> <p>For example, a <i>firm</i> may find the split of activities into <i>retail</i> and wholesale activities unsuitable. If so, the <i>firm</i> might:</p> <ul style="list-style-type: none"> (a) treat <i>retail</i> and wholesale activities together; or (b) use its own definition of retail and wholesale activities. 	