

Bank of England PRA

Appendix 6 to CP14/26 – Review of the Senior Managers and Certification Regime (SM&CR) – Phase 2

Consultation paper | CP14/26

October 2026



Table A: Summary of SM&CR Phase 2 proposals

SM&CR Phase 2 proposals by topic and primary location of relevant policy materials^(a)

Topic	Proposals	Primary location of policy materials (eg Rules, Supervisory Statements (SS), Statements of Policy (SoP))
SMF notification (Chapter 3)	Introduction of notified SMFs.* Approach to splitting Group Entity Senior Manager Function (SMF7) into pre-approved and notified roles based upon definition in rules. Strengthening Senior Manager accountability for assessing SMF F&P. Requiring SMF pre-approval in exceptional cases and use of s.55M to require firms.*	• The Glossary; • Senior Management Functions; • Insurance – Senior Management Functions; • Large Non-Solvency II Firms Senior Management Functions; • Non-Solvency II Firms Senior Management Functions; • Senior Managers Regime – Applications and Notifications; • Insurance – Senior Managers Regime – Applications and Notifications; • Large Non-Solvency II Firms Senior Managers Regime Applications and Notifications; • Non-Solvency II Firms Senior Managers Regime Applications and Notifications; • Allocation of Responsibilities; • Insurance – Allocation of Responsibilities; • Large Non-Solvency II Firms – Allocation of Responsibilities; • Non-Solvency II Firms – Allocation of Responsibilities; • SS28/15 – Strengthening individual accountability in banking; and • SS35/15 – Strengthening individual accountability in insurance.

Topic	Proposals	Primary location of policy materials (eg Rules, Supervisory Statements (SS), Statements of Policy (SoP))
Allocation of SMF responsibilities: PRs (Chapter 3)	Removing PRs relating to the Certification Regime and PR allocation, training and induction of members of a firm's governing body, senior management and key function holders (as applicable), MRMs, and maintenance of the firm's business model.	• Glossary; • Allocation of Responsibilities; • Insurance – Allocation of Responsibilities; • Large Non-Solvency II Firms – Allocation of Responsibilities; and • Non-Solvency II Firms – Allocation of Responsibilities.
Allocation of SMF responsibilities: SoRs, MRMs and Form J (Chapter 3)	Reducing frequency of SoR and MRM submissions. Disapplying the requirement to maintain SoRs and MRMs for firms with only one individual appointed as a Senior Manager (subject to special provisions in certain circumstances).	• Glossary; • Senior Managers Regime – Applications and Notifications; • Insurance – Senior Managers Regime – Applications and Notifications; • Large Non-Solvency II Firms Senior Managers Regime Applications and Notifications; • Non-Solvency II Firms Senior Managers Regime Applications and Notifications; • Allocation of Responsibilities; • Insurance – Allocation of Responsibilities; • Large Non-Solvency II Firms - Allocation of Responsibilities; • Non-Solvency II Firms - Allocation of Responsibilities; • SS28/15 – Strengthening individual accountability in banking; and

Topic	Proposals	Primary location of policy materials (eg Rules, Supervisory Statements (SS), Statements of Policy (SoP))
		SS35/15 – Strengthening individual accountability in insurance.
Temporary SMF cover and time-limited / conditional appointments (Chapter 3)	Extending the period of the Temporary SMF cover rule (previously the '12-week rule').	- Senior Managers Regime - Applications and Notifications; - Insurance - Senior Managers Regime - Applications and Notifications; - Large Non-Solvency II Firms Senior Managers Regime Applications and Notifications; - Non-Solvency II Firms Senior Managers Regime Applications and Notifications; - SS28/15 – Strengthening individual accountability in banking; and - SS35/15 – Strengthening individual accountability in insurance
	Time-limited and conditional approvals without the requirement to issue a statutory notice.*	SoP4/15 – Conditions, time limits and variations of approval.
Certification Regime (Chapter 4)	Removal of Fitness and Propriety (F&P) assessment on appointment and annually thereafter, requirement to issue certificates and regulatory references for those previously in scope of the Certification Regime.*	- The Glossary; - Certification; - Insurance – Certification; - Large Non-Solvency II Firms Certification; - Non-Solvency II Firms Certification; - Fitness and Propriety; - Insurance – Fitness and Propriety; - Large Non-Solvency II Firms Fitness and Propriety; - Non-Solvency II Firms – Fitness and Propriety; - Conduct Rules;

Topic	Proposals	Primary location of policy materials (eg Rules, Supervisory Statements (SS), Statements of Policy (SoP))
		• Insurance – Conduct Standards; • Large Non-Solvency II Firms Conduct Standards; • Insurance Special Purpose Vehicles Part; • Transitional Measures Part; • Non-Solvency II Transitional Measures; • Non-Solvency II Firms – Conduct Standards; • Reporting Part; • SS28/15 – Strengthening individual accountability in banking; and • SS35/15 – Strengthening individual accountability in insurance.
Other related proposals (Chapter 5)	Conduct rule breach notification requirements.*	• The Glossary; • Notifications; • Key Function Holder – Notifications ; • Large Non-Solvency II Firms – Key Function Holder – Notifications; and • Groups.
	Changes to forms. Streamlining Notified Non-Executive Director (NED) / Key Function Holder (KFH) requirements and retirement of the notification requirement (Form M).	• SS28/15 – Strengthening individual accountability in banking; and • SS35/15 – Strengthening individual accountability in insurance.

Topic	Proposals	Primary location of policy materials (eg Rules, Supervisory Statements (SS), Statements of Policy (SoP))
	Retirement of the changes in notified persons notification (Form F).	
	Further reform in relation to submission requirements at the regulatory for SMF applications.	

(a) indicates where proposal is subject to legislative amendment.