

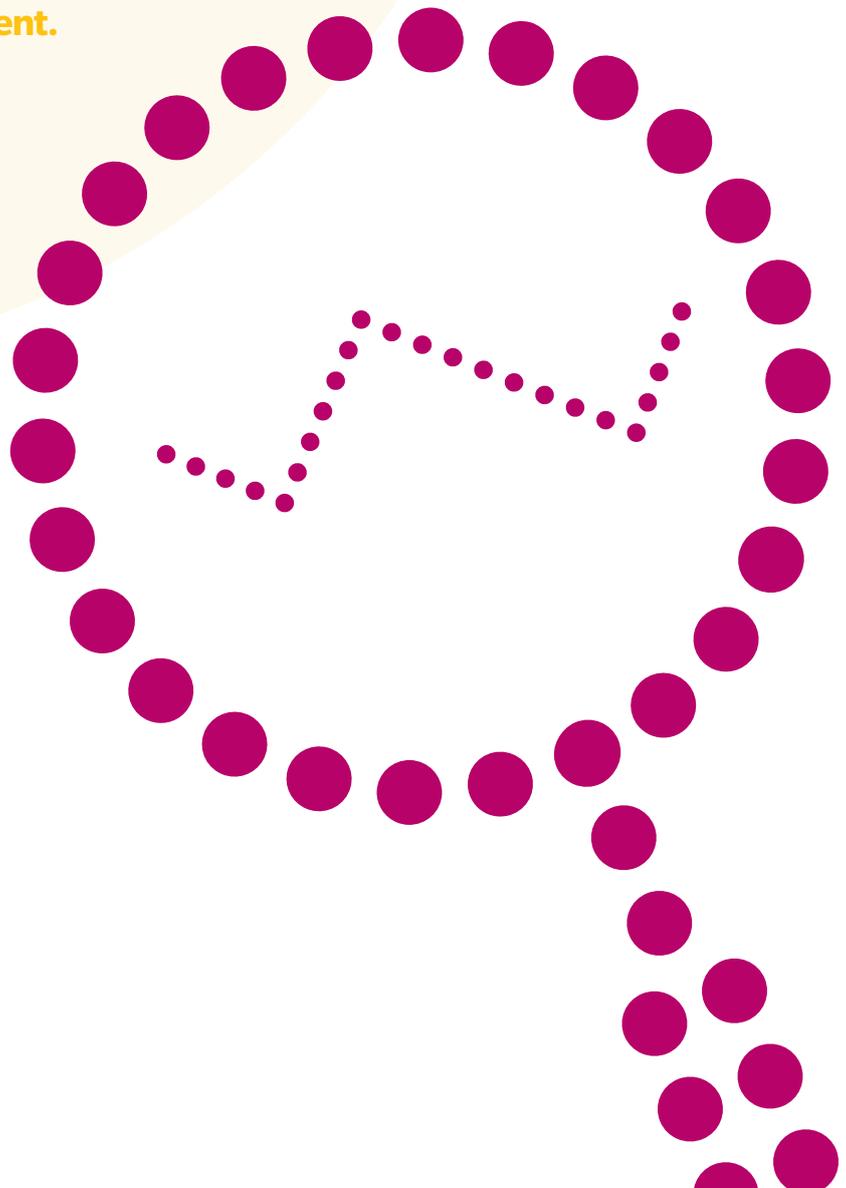
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# Brady Accountability Compliance

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For a complex organisation, defining, mapping, communicating and remaining up-to-date with management roles and responsibilities, and tracking these between multiple departments can be a time-consuming process, not to mention a regulatory requirement.

**BRADY.**



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## When managers leave, hand-over or change responsibilities, ensuring a clean and clear process to manage this is essential. While it is possible to achieve this purely with pages of documents, we believe this is far from best practice for any major organisation.



The FCA Senior Managers and Certification Regime (SM&CR) has been in force for Banks, Building Societies and Credit Unions since 2016, and will be for insurance companies in December 2018.

**By December 2019**, all other FCA regulated companies will need to have systems in place to comply with this regulation.

This regulation replaces the Approved Persons Regime. All FSMA authorised companies or branches of non-UK firms with permission to carry out regulated activities in the UK will need to be compliant.

While regulation like this does provide an extra burden of compliance, we see this as an opportunity for companies to step back, and look at ways to improve processes to ensure that not only are they compliant with the regulation, but really have a robust solution in place to help their organisation remain as efficient as possible.

The Brady Accountability Compliance (BAC) solution allows companies to implement a framework and streamline processes for management accountability.

BAC enables your company to easily map and maintain the functions, responsibilities and accountabilities of your senior managers. The level of ease and control with which you can change and update these means that you can use our solutions to embed high standards of governance and drive a positive culture within your firm, providing a full audit and regulatory compliance without a huge overhead.

For this solution, Brady have partnered with Trailight, the market-leading provider of compliance software and services in this space.

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### Senior Managers Regime

BAC manages the key aspects of the senior managers regime, allowing you to:

- Document and manage Statements of Responsibilities (SoR)
- Generate a Management Responsibilities Map (MRM)
- Set up and manage handover processes for changes in roles and responsibilities
- Manage an approval and sign-off process
- Provide a full audit of all changes, decisions and approvals
- Gain full transparency on firm and individual accountability for regime compliance, decision making and reasonable steps

Using a tailored software solution to manage this can transform what can be a bureaucratic process into an improvement in operational efficiency, reducing both cost and risk.



### Certification

The change in regulation puts the onus on the firm rather than the regulator to perform the necessary checks to certify that key staff members are “fit and proper” to perform their role. This process needs to be carried out at least once a year.

BAC provides full control over this process, including:

- Identification of roles to significant harm functions within the group and its entities
- Mapping those roles to people within the organisation
- Assessing fitness and propriety
- Creation, sign off and issue of appropriate certificates
- Ongoing compliance due to ongoing annual regime and change management requirements

Using BAC’s Certification module simplifies the process of set up and ongoing management and increases the transparency of your compliance and provides centralisation for all impacted roles and functions. This automation will ultimately lead to cost benefit and risk reduction.



### Conduct Rules

The final key part of the Regime is the Conduct rules which apply to all staff that the FCA has not excluded as ancillary. This means that all non-ancillary staff are expected to understand and comply with Tier 1 conduct rules. The main challenges with compliance to the regime include:

- Identification of the staff covered by the Conduct Rules
- Recording and managing of conduct training
- Management of breach and breach reporting to the regulator

Using the BAC solution enables firms to identify and manage large or small groups of staff that are subject to conduct rules. This leads to enhanced transparency and effective systems and controls.



### Embed best practice in your organisation

Transparency is key to establishing a good framework for senior management responsibilities – both for the regulators and your own business. Rather than aiming to tick the boxes to comply with the regulation, this is an opportunity for your organisation to establish practise that will benefit it for the long term.

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**Brady  
Accountability  
Compliance**

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