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Leading on Investments and Savings

# SM&CR

Obligations on the individual through the  
employee lifecycle (BAU processes)

## SM&CR - Obligations on the individual through the employee lifecycle (BAU processes)

- This document is intended to provide individuals with information and considerations applicable to them for BAU processes of the employee lifecycle following the extension of the Senior Managers & Certification Regime (SM&CR) to all solo regulated firms on 9<sup>th</sup> December 2019
- This will aid individuals in scope of the regime to prepare for and understand the responsibilities and expectations on them at implementation whether they are a Senior Manager, hold a Certification Function, are a non-SMF NED or a Conduct Rules employee.
- Assessment, disciplinary and dismissal processes will be considered in a separate document for production in Q2 2019.

# What SM&CR seeks to deliver (how the FCA will measure success)

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- The most senior people know what they are responsible for
- There is a focus on skills, capability and conduct within the firm – and a commitment to ensuring staff are fit and proper to carry out their roles
- The Conduct Rules set a foundation for how individuals behave
- There is a sense of accountability throughout the firm – individuals speak out when they see harm or potential harm
- Improved systems and controls mean that the FCA can easily assess the suitability of senior management
- The FCA is able to hold individuals to account

# What does it mean to me?

Use the links below to see information and considerations for individuals in the following roles:

**Senior Manager**

**Certified Person**

**Non-SMF NED**

**Conduct Staff**

Use the link below if you want to see information and considerations for individuals at each point in the employee lifecycle:

**Employee Lifecycle**



# Senior Managers

# Senior Management Functions (SMFs)

- A Senior Management Function (SMF) is a new type of controlled function under FSMA (Financial Services and Markets Act 2000). The FCA have prescribed a number of SMFs in their Handbook
- The FCA call the people who hold these functions Senior Managers
- They are the most senior people in a firm with the greatest potential to cause harm or impact upon market integrity
- The FCA make particular functions SMFs so that they know who a firm's most senior decision makers are, and to make sure firms clearly allocate responsibilities to those key individuals

# Overview of SMCR: Scope covering the Senior Manager

Rules	Senior Manager (exec/non-exec)
SMF (including overall responsibility* for an activity/business unit or management function) identification, allocation and FCA approval <b>before</b> undertaking the role	x
SMF Duty of Responsibility & take Reasonable Steps	x
Statement of Responsibility ('SOR'), document prescribed, other and overall* responsibilities - align with job description	x
Criminal checks	x
SMF Handover procedures*	x
Fitness and Propriety Assessment: (personal characteristics, honesty/integrity & reputation, competence and financial soundness)	x
Last 6 years of Regulatory References	x
Certificate decision and issue (initial, ongoing and renewed annually)	
Conduct (all 9 conduct rules apply to an individual who is also a SMF; 5 apply to the other individuals in scope)	9
Noted in the public register / the Directory	Register

\*Enhanced firms mandatory only x = good practice

# SMCR key elements: impact of change on the individual

1. SMF: FCA pre approval process

2. SMF SOR

3. Regulatory References

4. Fitness and propriety assessments (initial and ongoing)

5. Certification

6. Ongoing Standards of Conduct

7. SMF duty of responsibility

8. SMF Handover process\*

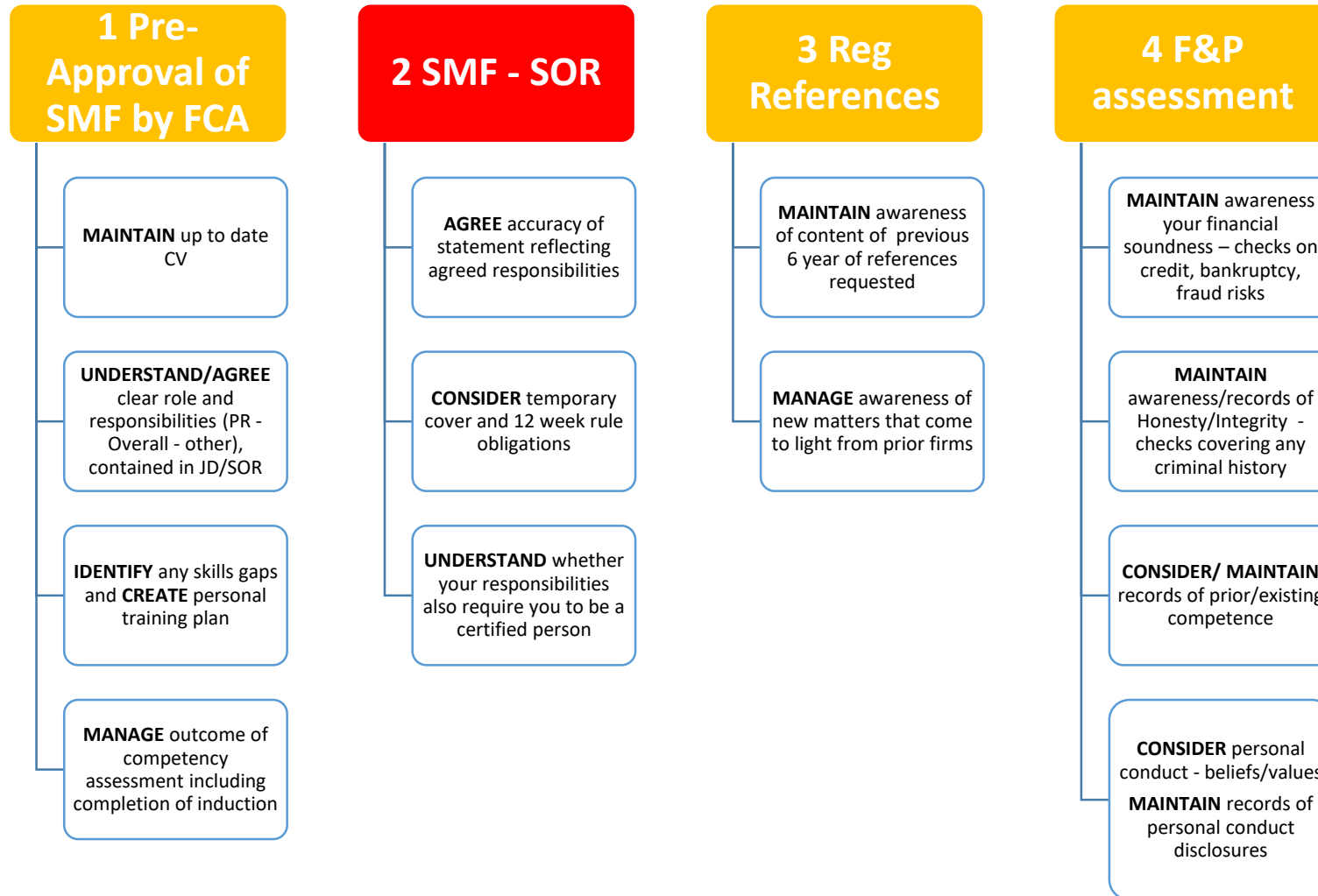
Red = new regulation

Amber = enhancement of existing regulations

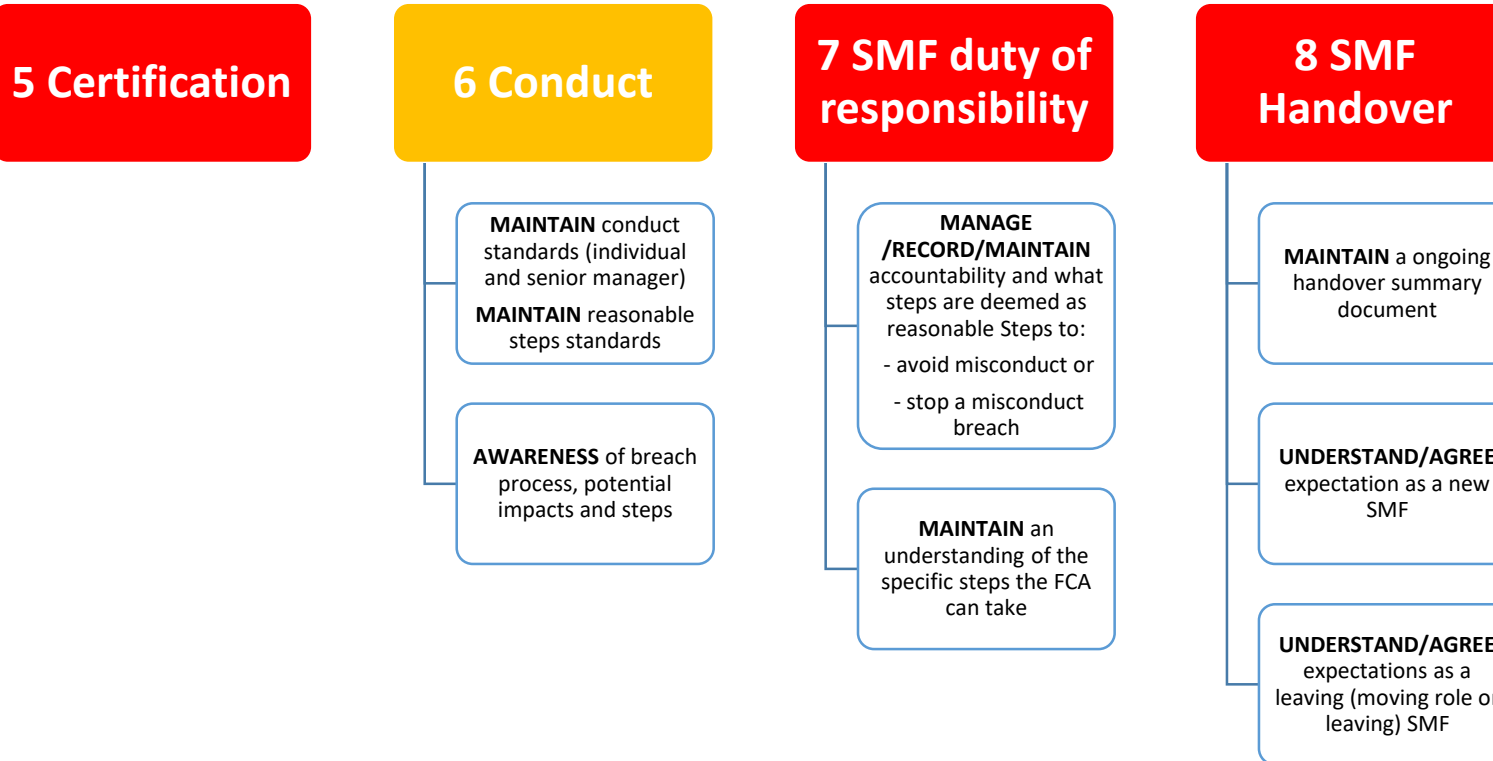
\* Mandatory for enhanced firms and 'potential' good practice for core firms



# Key individual life cycle actions – Senior Manager (1)



# Key individual life cycle actions – Senior Manager (2)



## Transition to Senior Manager Role – individual actions required before implementation

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- Your existing approval will need to be converted by the FCA to the correct Senior Management Function(s) or your new approval will need to be in place
- You will need to ensure that your responsibilities are clear to you and recorded accurately (Job Description/Statement of Responsibilities) and that you have agreed them
- You will need to have identified any dependencies in relation to your responsibilities

# New Senior Manager Role – actions required following implementation

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- Regulatory references (last 6 years) will need to have been received and considered by your new employer
- You will need to be assessed as fit and proper to undertake your role
- You will need to ensure that your responsibilities are clear to you and recorded accurately (Job Description/Statement of Responsibilities) *a NDA may be required to facilitate this prior to appointment*
- You will need to be pre-approved by the FCA
- You will not be able to undertake your role until such pre-approval has been confirmed

# Points in time requirements for a new Senior Manager Role following implementation

## Hiring process

- Accurate and up to date CV
- Role responsibilities recorded (job description) and reviewed by individual
- Accurate training records available to firm
- **F&P assessment vetting:**
  - DBS checks undertaken and certificate provided by individual
  - CIFAS checks to ensure no fraud markers on credit file
  - Qualifications & Competencies assessed at interview
  - Personal characteristics, beliefs 'conduct boundaries' being assessed at interview
- Request 6 year regulatory references and contract subject to review of findings received

## Onboarded

- Chase last 6 years regulatory references
- **Initial F&P assessment** - discussion about any skills gap & steps to demonstrate gaps have been closed
  - Induction programme
    - L&D plan, including that you understand your regulatory responsibilities and who is to oversee this has been completed
  - Document describing how competencies were assessed and mapping suitability of the individual to the responsibilities of the role
  - SOR accurately reflects the aspects of the affairs of the firm which it is intended that the individual will be responsible for managing and that you have confirmed that you accept the responsibilities per the SOR
  - Form A is accurate in its disclosures, complete and reviewed and declaration understood by the individual
  - Send Form A and attachments to FCA (post vetting has been completed)
  - receive and review handover document, that should have materials that relate to how the previous SMF discharged responsibilities, that will belong to you

## Commence role

- Not undertake responsibilities of your role until FCA approval has been received
- Finalise F&P assessment as the L&D path, induction, conduct training etc would have been completed in first month of joining firm

# Senior Manager Role – ongoing individual actions required

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- You will have an ongoing duty of responsibility to meet conduct standards and apply reasonable steps in doing so – breaches relating to mis-conduct by you or arising in your area of responsibility could leave you accountable
- You will need to apply, demonstrate and record reasonable steps in relation to your prescribed responsibilities
- You will have an ongoing duty to maintain standards of conduct and receive annual training
- You should maintain a handover document to support succession planning

# What do I want to see next?

Use the links below if you want to see information and considerations for individuals in the following roles:

**Certified Person**

**Non-SMF NED**

**Conduct Staff**

Use the link below if you want to see information and considerations for individuals at each point in the employee lifecycle:

**Employee Lifecycle**

Use the links below if you want to see more information on SM&CR provided by TISA and by the FCA:

**TISA**

**FCA**



# Certified Persons



# Certification Regime

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- Certification covers specific functions that aren't Senior Management Functions, but can have a significant impact on customers, the firm and/or market integrity.
- Firms must check and confirm that the person performing a Certification Function is fit and proper to do the job, and issue them with a certificate.
- This certification must be done at least once a year, and firms should take into account whether the individual:
  - has obtained a qualification
  - has undergone, or is undergoing, training
  - possesses a level of competence

# Overview of SMCR: Scope covering the Certified Person

Rules	Certified Person
SMF (including overall responsibility* for an activity/business unit or management function) identification, allocation and FCA approval <b>before</b> undertaking the role	
SMF Duty of Responsibility & take Reasonable Steps	
Statement of Responsibility ('SOR'), document prescribed, other and overall* responsibilities - align with job description	
Criminal checks	x
SMF Handover procedures*	
Fitness and Propriety Assessment: (personal characteristics, honesty/integrity & reputation, competence and financial soundness)	x
Last 6 years of Regulatory References	x
Certificate decision and issue (initial, ongoing and renewed annually)	x
Conduct (all 9 conduct rules apply to an individual who is also a SMF; 5 apply to the other individuals in scope)	5
Noted in the public register / the Directory	<b>Directory</b>

\*Enhanced firms mandatory only x = good practice

# SMCR key elements: impact of change on the individual

1. SMF: FCA pre approval process

2. SMF SOR

3. Regulatory References

4. Fitness and propriety assessments (initial and ongoing)

5. Certification

6. Ongoing Standards of Conduct

7. SMF duty of responsibility

8. SMF Handover process\*

Red = new regulation

Amber = enhancement of existing regulations

\* Mandatory for enhanced firms and 'potential' good practice for core firms

# Key individual life cycle actions – Certified Person

1 Pre-Approval of SMF by FCA

2 SMF - SOR

3 Reg References

4 F&P assessment

5 Certification

6 Conduct

7 SMF duty of responsibility

8 SMF Handover

**MAINTAIN**  
awareness of content of previous 6 year of references requested

**MANAGE**  
awareness of new matters that come to light from prior firms

**MAINTAIN** awareness your financial soundness – checks on credit, bankruptcy, fraud risks

**MAINTAIN** awareness/records of Honesty/Integrity - checks covering any criminal history

**CONSIDER/ MAINTAIN** records of prior/existing competence

**CONSIDER** personal conduct - beliefs/values  
**MAINTAIN** records of personal conduct disclosures

**REQUIRE** certification to maintain role

**CONSIDER** certificate issued only if F&P  
- initial and  
- annual

**CONSIDER** impact of trigger events

**CONSIDER** disciplinary and dismissal process

**MAINTAIN** individual conduct standards

**AWARENESS** of breach process, potential impacts and steps

# Transition to Certified Person Role at implementation (9<sup>th</sup> December 2019)

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- You will need to understand which certified role(s) have been allocated to you and ensure that your job description is clear in identifying and describing this
- You will be required to meet certain fit and proper standards and be assessed on these within the first year of implementation (i.e. before 9<sup>th</sup> December 2020) on an ongoing basis. Some firms are introducing their assessments at implementation so there may be some discrepancy over requirements between firms in this period.

# New Certified Person Role – actions required following implementation

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- Regulatory references (last 6 years) will need to have been received and considered by your new employer
- You will need to understand which certified role(s) have been allocated to you and ensure that your job description is clear in identifying and describing this *a NDA may be required to facilitate this prior to appointment*
- You will be required to meet certain fit and proper standards and be assessed on joining *this maybe a pre-requisite to commencing your role*

# Points in time requirements for a certified person following implementation

## Hiring process

- Accurate and up to date CV
- Role responsibilities recorded (job description) and reviewed by individual
- Accurate training records available to firm
- **F&P assessment vetting:**
  - DBS checks undertaken and certificate provided by individual
  - CIFAS checks to ensure no fraud markers on credit file
  - Qualifications & Competencies assessed at interview
  - Personal characteristics, beliefs 'conduct boundaries' being assessed at interview
- Request 6 year regulatory references and contract subject to review of findings received

## Onboarded

- Chase last 6 years regulatory references
- **Initial F&P assessment** - discussion about any skills gap & steps to demonstrate gaps have been closed
  - Induction programme
  - L&D plan, including that you understand your regulatory responsibilities and who is to oversee this has been completed
- Document describing how competencies were assessed and mapping suitability of the individual to the responsibilities of the role

## Commence role

- Finalise F&P assessment as the L&D path, induction, conduct training etc would have been completed in first month of joining firm
- Obtain certificate



# Certified Person Role – ongoing individual actions required

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- You will be required to meet certain fit and proper standards and be assessed on these on an ongoing basis
- Annually you will receive a certificate confirming your fitness and propriety
- You will have an ongoing duty to maintain standards of conduct and receive annual training
- You should raise any conduct issues or concerns with your manager or other appropriate channels specified by your firm



# What do I want to see next?

Use the links below if you want to see information and considerations for individuals in the following roles:

**Senior Manager**

**Non-SMF NED**

**Conduct Staff**

Use the link below if you want to see information and considerations for individuals at each point in the employee lifecycle:

**Employee Lifecycle**

Use the links below if you want to see more information on SM&CR provided by TISA and by the FCA:

**TISA**

**FCA**



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# Non-SMF NEDs

## Non SMF Non-Executive Directors (NEDs)

- Only NEDs who hold a Chair role (including Chairs of Committees) or the Senior Independent Director (SID), will be approved by the FCA under the SM&CR as a Senior Manager
- Non-approved NEDs will still be subject to the Conduct Rules, fit and proper requirements and regulatory reference rules.

# Overview of SMCR: Scope covering the Non-SMF NED

Rules	Non-SMF NED
SMF (including overall responsibility* for an activity/business unit or management function) identification, allocation and FCA approval <b>before</b> undertaking the role	
SMF Duty of Responsibility & take Reasonable Steps	
Statement of Responsibility ('SOR'), document prescribed, other and overall* responsibilities - align with job description	
Criminal checks	x
SMF Handover procedures*	
Fitness and Propriety Assessment: (personal characteristics, honesty/integrity & reputation, competence and financial soundness)	x
Last 6 years of Regulatory References	x
Certificate decision and issue (initial, ongoing and renewed annually)	
Conduct (all 9 conduct rules apply to an individual who is also a SMF; 5 apply to the other individuals in scope)	5
Noted in the public register / the Directory	

\*Enhanced firms mandatory only x = good practice

# SMCR key elements: impact of change on the individual

1. SMF: FCA pre approval process

2. SMF SOR

3. Regulatory References

4. Fitness and propriety assessments (initial and ongoing)

5. Certification

6. Ongoing Standards of Conduct

7. SMF duty of responsibility

8. SMF Handover process\*

Red = new regulation

Amber = enhancement of existing regulations

\* Mandatory for enhanced firms and 'potential' good practice for core firms

# Key individual life cycle actions – Non-SMF NED

1 Pre-Approval of SMF by FCA

2 SMF - SOR

3 Reg References

4 F&P assessment

7 SMF duty of responsibility

8 SMF Handover

5 Certification

6 Conduct

- MAINTAIN** awareness of content of previous 6 year of references requested
- MANAGE** awareness of new matters that come to light from prior firms

- MAINTAIN** awareness your financial soundness – checks on credit, bankruptcy, fraud risks
- MAINTAIN** awareness/records of Honesty/Integrity - checks covering any criminal history
- CONSIDER/ MAINTAIN** records of prior/existing competence
- CONSIDER** personal conduct - beliefs/values
- MAINTAIN** records of personal conduct disclosures

- REQUIRE** certification to maintain role
- CONSIDER** certificate issued only if F&P - initial and - annual
- CONSIDER** impact of trigger events
- CONSIDER** disciplinary and dismissal process

- MAINTAIN** individual conduct standards
- AWARENESS** of breach process, potential impacts and steps

# Transition to Non-SMF NED Role at implementation (9<sup>th</sup> December 2019)

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- You will be required to meet certain fit and proper standards and be assessed on these within the first year of implementation (i.e. before 9<sup>th</sup> December 2020) on an ongoing basis. Some firms are introducing their assessments at implementation so there may be some discrepancy over requirements between firms in this period

# New Non-SMF NED Role – actions required following implementation

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- Regulatory references (last 6 years) will need to have been received and considered by your new employer
- You will be required to meet certain fit and proper standards and be assessed on joining
- Both actions will be required by the firm before you are appointed as a Board Director



# Points in time requirements for a non-SMF NED following implementation

## Hiring process

- Accurate and up to date CV
- Role responsibilities recorded (job description) and reviewed by individual
- Accurate training records available to firm
- **F&P assessment vetting:**
  - DBS checks undertaken and certificate provided by individual
  - CIFAS checks to ensure no fraud markers on credit file
  - Qualifications & Competencies assessed at interview
  - Personal characteristics, beliefs 'conduct boundaries' being assessed at interview
- Request 6 year regulatory references and contract subject to review of findings received

## Onboarded

- Chase last 6 years regulatory references
- **Initial F&P assessment** - discussion about any skills gap & steps to demonstrate gaps have been closed
  - Induction programme
  - L&D plan, including that you understand your regulatory responsibilities and who is to oversee this has been completed
    - specific conduct training
  - Document describing how competencies were assessed and mapping suitability of the individual to the responsibilities of the role

## Commence role

- Finalise F&P assessment as the L&D path, induction, conduct training etc would have been completed in first month of joining firm

# Non-SMF NED – ongoing individual actions required

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- You will be required to meet certain fit and proper standards and be assessed on these on an ongoing basis
- Annually you will receive a certificate confirming your fitness and propriety
- You will have an ongoing duty to maintain standards of conduct and receive annual training
- You should raise any conduct issues or concerns with using the appropriate channels specified by your firm

# What do I want to see next?

Use the links below if you want to see information and considerations for individuals in the following roles:

**Senior Manager**

**Certified Person**

**Conduct Staff**

Use the link below if you want to see information and considerations for individuals at each point in the employee lifecycle:

**Employee Lifecycle**

Use the links below if you want to see more information on SM&CR provided by TISA and by the FCA:

**TISA**

**FCA**



# Conduct Staff

# Conduct Rules

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- The Conduct Rules are a new set of five rules applied to all employees within a firm that set basic standards of good personal conduct, against which the FCA can hold people to account.
- Four additional Conduct Rules are applied to Senior Managers.
- As the Conduct Rules apply to staff directly, they will help shape the culture, standards and policies of firms as a whole and promote positive behaviours that reduce harm.
- The Conduct Rules are intended to improve standards of individual behaviour in financial services from the top down and the bottom up. They represent a meaningful change in the standards of conduct the FCA expect from those working in the industry.

# Overview of SMCR: Scope covering the Conduct Staff

Rules	Conduct Staff
SMF (including overall responsibility* for an activity/business unit or management function) identification, allocation and FCA approval <b>before</b> undertaking the role	
SMF Duty of Responsibility & take Reasonable Steps	
Statement of Responsibility ('SOR'), document prescribed, other and overall* responsibilities - align with job description	
Criminal checks	
SMF Handover procedures*	
Fitness and Propriety Assessment: (personal characteristics, honesty/integrity & reputation, competence and financial soundness)	
Last 6 years of Regulatory References	
Certificate decision and issue (initial, ongoing and renewed annually)	
Conduct (all 9 conduct rules apply to an individual who is also a SMF; 5 apply to the other individuals in scope)	<b>5</b>
Noted in the public register / the Directory	

\*Enhanced firms mandatory only x = good practice

# SMCR key elements: impact of change on the individual

1. SMF: FCA pre approval process

2. SMF SOR

3. Regulatory References

4. Fitness and propriety assessments (initial and ongoing)

5. Certification

6. Ongoing Standards of Conduct

7. SMF duty of responsibility

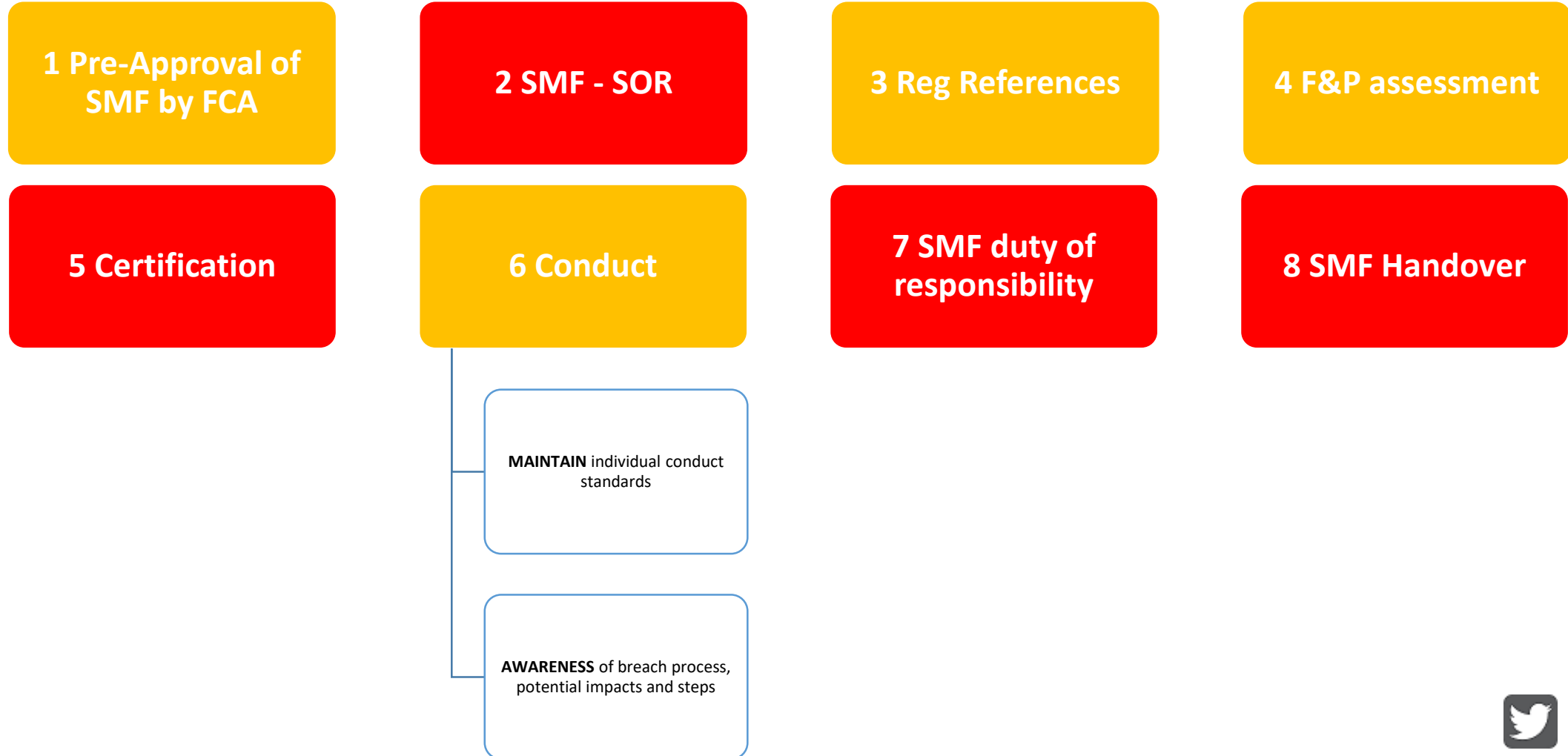
8. SMF Handover process\*

Red = new regulation

Amber = enhancement of existing regulations

\* Mandatory for enhanced firms and 'potential' good practice for core firms

# Key individual life cycle actions – Conduct Staff





# Existing/Ongoing Conduct Staff Role

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- You will have an ongoing duty to maintain standards of conduct
- You will need to ensure that you attend / complete conduct training each year
- You should raise any conduct issues or concerns with your manager or other appropriate channels specified by your firm

# Points in time requirements for a conduct staff following implementation

## Hiring process

- Accurate and up to date CV
- Role responsibilities recorded (job description) and reviewed by individual
- Accurate training records available to firm
- Qualifications & Competencies assessed at interview
- Personal characteristics, beliefs 'conduct boundaries' being assessed at interview

## Onboarded

- Induction programme
  - L&D plan, including that you understand your regulatory responsibilities and who is to oversee this has been completed
- specific conduct training

## Commence role

- Finalise L&D path, induction, conduct training etc would have been completed in first month of joining firm

# What do I want to see next?

Use the links below if you want to see information and considerations for individuals in the following roles:

**Senior Manager**

**Certified Person**

**Non-SMF NED**

Use the link below if you want to see information and considerations for individuals at each point in the employee lifecycle:

**Employee Lifecycle**

Use the links below if you want to see more information on SM&CR provided by TISA and by the FCA:

**TISA**

**FCA**

A graphic element consisting of a horizontal, elongated shape with a gradient from red to yellow to green to blue, resembling a stylized flame or a swoosh, positioned above the word 'tisa'.

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# Business Processes and the Employee Lifecycle

# SM&CR –Business processes through the employee lifecycle (BAU processes)

- This section is intended to provide individuals with awareness of firms business processes that are likely to be in place to support the employee lifecycle following the extension of the Senior Managers & Certification Regime (SM&CR) to all solo regulated firms on 9<sup>th</sup> December 2019
- This will aid individuals in scope of the regime to prepare for and understand the responsibilities and expectations on them at each point in the employee lifecycle whether they are a Senior Manager, hold a Certification Function, are a non-SMF NED or a Conduct Rules employee.
- Assessment, disciplinary and dismissal processes will be considered in a separate document for production in Q2 2019.

# Implementation: Key First Steps\*

## Stakeholder Engagement

- Obtain a Board Sponsor
- Provide training on purpose/key decisions and steps to take
- Outline and agree the role of the board

## Governance Framework

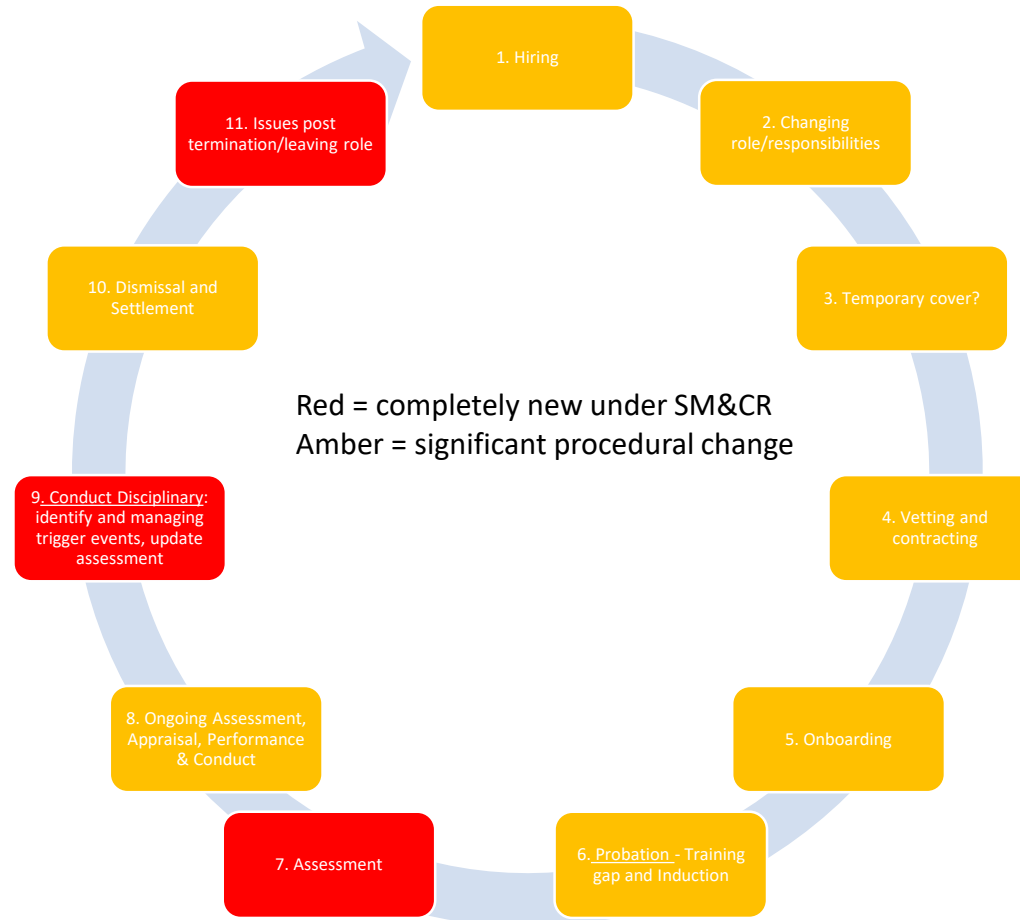
- Opportunity to review existing framework and how business Senior Managers link into Governance
- Define and determine Accountability and Responsibility for business units or management functions
- Define and determine Certification Functions
- Obtain Senior Manager buy in and encourage involvement

## Outline of Engagement Model

- Mapping the business activities and who runs it
- Processes to plan /assess current operating model and update/develop
- Processes to plan /assess current **employee lifecycle** and update/develop business processes to fit new model
- Culture 'temperature check' – understand the current position
- Create resourcing plan for implementation and BAU
- Create training plans and deliverables for all types of employee
- *Complete by end June 2019 to enable timely implementation*

\*Can be used by firms to draw out initial plans and first steps to SM&CR implementation and provide areas of expected engagement for individuals

# Business Processes to support embedding the Employee Lifecycle effectively



# Business Processes to Manage ELC Elements

Firms Processes	ELC Element	Process Controls
1.Hiring	1 SMF pre – approval 2 SMF SOR 3 Regulatory refs 4 F&P assessment 5 Certification 6 Conduct	Awareness of role scope - SMF, Certified and Conduct obligations clear through JD Up to date and accurate CV and historic training records Provision of qualifications (as requested) and by date requested Seek overview of SMCR obligations to you during recruitment process CIFAS verification that no 'fraud markers' exist on your credit file Review your credit file Get a DBS update certificate and annual service account (£13) Understand the firm's 'purpose' and conduct standards - evaluate that these sit with your beliefs, values and conduct boundaries
2.Internal change in role/person	1 SMF pre – approval 2 SMF SOR 3 Regulatory refs 4 F&P assessment 5 Certification 6 Conduct	Keep abreast of relevant industry and regulatory change Awareness that during interview competency, personal characteristics and integrity checks will be made Regulatory references will be requested covering last 6 years (external hires only - <i>unless firms are unable to rely on internal controls and records</i> ) Get a copy of the intended SOR (SMF only) and understand/challenge responsibilities as described Aware steps during and post onboarding before you can start job unsupervised, such as completion of vetting, F&P assessment, SMF approval from FCA (and certification) FAQ to review and attest as read and understood that provide an overview of the obligations and conduct expectations
3. Temporary cover	1 SMF pre-approval 4 F&P assessment 5 Certification	You don't require to be approved by FCA, unless it becomes clear that the 'cover' is to extend beyond 12 weeks - a process will be needed to monitor this and report is required as a control



# Business Processes to Manage ELC Elements

Firms Processes	ELC Element	Process Controls
4. Vetting and Contracting	3 Regulatory refs 4 F&P assessment 6 Conduct	Offer letter - conditional of completion of F&P assessment and receipt/review of <b>all</b> regulatory references Be aware of firms providing the regulatory references, the process and visibility of template (completed references) to ensure that there is no material false or misleading information contained in references
5. Onboarding	2 SMF SOR 8 SMF Handover	SMF evaluate SOR, as FCA pre approval requires that you confirm that SOR accurately reflects the aspects of the affairs of the firm which it is intended that you will be responsible for managing Status of last 6 years regulatory references? - Document describing how competencies were assessed and mapping suitability of the individual to the responsibilities of the role - SOR accurately reflects the aspects of the affairs of the firm which it is intended that the individual will be responsible for managing and that you have confirmed that you accept the responsibilities per the SOR - Form A is accurate in its disclosures, complete and reviewed and declaration understood by the individual - Send Form A and attachments to FCA ( <i>post vetting has been completed</i> )
6. Probation: Closing the training gap & Induction	1 SMF pre-approval 4 F&P Assessment 5 Certification 6 Conduct	- <b>Initial F&amp;P assessment</b> - discussion about any skills gap & steps to demonstrate gaps have been closed - Induction programme - L&D plan, including that you understand your regulatory responsibilities and who is to oversee this has been completed - receive specific conduct training as part of L&D plan

# Business Processes to Manage ELC Elements

Firms Processes	ELC Element	Process Controls
7. Assessment	4 F&P Assessment 5 Certification 7 Duty of Responsibility	Initial suitability checks covering <u>financial soundness</u> (undertaken during vetting, such as credit checks); <u>competence</u> (covered through interview and probation); <u>honesty &amp; integrity</u> (undertaken during vetting e.g. criminal checks and regulatory references); finally <u>personal character</u> checks through the regulatory references providing details of any mis-conduct and performance through interview questions Awareness of how competency was assessed, that demonstrated your competencies and how your suitability maps to your specific role responsibilities
8. Ongoing Assessment, Appraisal, Performance & Conduct	4 F&P Assessment 5 Certification 6 Conduct 7 Duty of Responsibility	Receive adequate time and space to complete training and provide such additional evidence to support annual certification renewal Maintain personal financial soundness Stay in touch with the policies, procedures/processes that are relevant to your role/discharge of your responsibilities
9. <u>Conduct Disciplinary</u> : identify and managing trigger events, update assessment	6 Conduct 7 Duty of Responsibility	Mis-conduct ( <i>as defined by each firm against their own risk appetite and framework</i> ) including – personal (behavioral, financial soundness) training/qualifications, conflicts, misleading/deceptive information
10. Disciplinary & Dismissal processes	6 Conduct 7 Duty of Responsibility	
11. Issues arising post leaving	3 Reg References	Aware that firm can update regulatory references provided at a later date if something concerning mis conduct comes to light

# What do I want to see next?

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Use the links below if you want to see information and considerations for individuals in the following roles:

**Senior Manager**

**Certified Person**

**Non-SMF NED**

**Conduct Staff**

Use the links below if you want to see more information on SM&CR provided by TISA and by the FCA:

**TISA**

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