

Skilled Person Panel Lot Descriptions

The Skilled Person Panel is composed of twelve areas of expertise for skilled persons services, referred to as Lots. A summary of each Lot is provided below.

Effective from 1 April 2026.

Lot A: Client Assets and Safeguarding

Advice, skills and technical expertise in some or all of client assets, safeguarding, stablecoin issuance, and cryptoasset custody.

This will include skills, experience and expertise in areas such as, but not limited to:

- Client Assets (CASS) and SUP 16 in the appropriate regulator's Handbook, including governance, regulatory reporting and systems and controls arrangements associated with client assets.
- Safeguarding requirements as set out in the Payment Services Regulations 2017 and E-money Regulations 2011, and the FCA Payment Services and Electronic Money Approach Document.
- Safeguarding CP25/14: Stablecoin issuance and cryptoasset custody, and any subsequent publications and additions/changes to the appropriate regulator's Handbook relevant to the issuance and custody of cryptoassets.

Lot B: Governance, Accountability and Culture

Advice, skills and technical expertise in assessing for regulated firms (or designated Critical Third Parties):

- appropriateness and effectiveness of firm governance arrangements and frameworks
- leadership and individual accountability, including the Senior Managers and Certification Regime (SM&CR)
- organisational culture
- effectiveness of governance in practice to provide oversight on delivery of outcomes and regulatory objectives, including consumer protection, safety and soundness.

This should include, but not be limited to, knowledge of relevant regulatory requirements, standards, guidelines and industry best practice, and experience and expertise in assessing some or all of the following:

Governance

- Board composition, independence, succession plans, and holding executives accountable
- effective committee frameworks and decision-making, including board and executive committees
- appropriateness of governance structures for complex groups with many legal entities

- management of conflicts of interest
- purpose, risk appetite, business model, strategy and change management programmes (e.g. during transition, implementation and delivery)
- policies and procedures.

Leadership and individual accountability

- leadership effectiveness
- the SM&CR, including the assessment of the fitness and propriety of Senior Managers and certified staff, the embedding and application of the Conduct Rules, and individual accountability.

Organisational culture

- psychological safety, diversity of thought, non-financial misconduct and inclusive cultures
- whistleblowing processes and practices
- people policies and practices (including remuneration, training and competence)
- culture, including risk culture (which encompasses Prescribed Responsibilities for culture)
- tone from the top, communication, and link with conduct
- management information on culture
- involvement across all levels of firms that encourages effective challenge and prevents harm by promoting inclusion of a range of views in the decision-making process.

Lot C: Controls and Risk Management Frameworks

Advice, skills and technical expertise in assessing for regulated firms (or designated Critical Third Parties) whether:

- they have effective controls and risk management arrangements in relation to (i) identifying, escalating, monitoring and management of risks, (ii) taking a risk-based approach to deliver fair outcomes for customers, (iii) safety and soundness, and (iv) financial resilience
- they have effective systems and controls to operate their businesses in line with regulatory requirements from an operational resilience perspective
- their risk management frameworks are effectively embedded through the organisation resulting in an effective culture and approach to the management of risk - evidenced in the design, operation and oversight of controls across the three lines of defence.

This should include, but not be limited to, knowledge of relevant regulatory requirements, standards, guidelines and industry best practice, and experience and expertise, in assessing some or all of the following:

Effective risk management

- risk management arrangements to identify, monitor, manage and escalate novel and emerging risks across all types of risk
- risks in outsourcing arrangements (including third party and supplier change risk management).

Effective controls and governance

- a firm's ability to self-identify and effectively control for all types of risk
- effectiveness and strength of a firm's Risk, Compliance and Internal Audit functions
- effectiveness of a firm's management information (MI), including how the MI is used to (i) identify, escalate, monitor and manage risks, (ii) to build model risk expertise, and (iii) to support effective management reporting
- the preparation and reporting of regulatory returns and disclosures.

Operational resilience

- firms have in place sound, effective and comprehensive strategies, processes and systems to identify important business services, and set appropriate impact tolerance for each one. This includes:
- specifying the point at which a disruption would pose a risk to a firm's safety and soundness (and, for Other Systemically Important Institutions (OSII), the stability of the UK's financial system)
- demonstrating their ability to operate within those tolerances through robust testing.
- firms understand the impact of a disruption to consumers, firms' own operations, market integrity and the wider systemic impact.

Lot D: Conduct of Business

Advice, skills and technical expertise in assessing application of relevant conduct of business rules and requirements (and other considerations), and adherence to the Consumer Duty; and wholesale market conduct.

This should include, but not be limited to, knowledge of relevant regulatory requirements, standards, guidelines and industry best practice, and experience and expertise in assessing some or all of the following to achieve good outcomes for customers:

Products and services

- design, manufacture, value and distribution of financial products and services
- sales, marketing and advertising, including disclosure requirements
- approval of financial promotions

Price and value

- products and services provide fair value and meet customers' needs

Consumer understanding

- customer communications
- quality and suitability of advice

Consumer support

- the fair treatment of customers, including those with characteristics of vulnerability
- collections and arrears management
- complaints and claims handling
- management of conflicts of interest
- past business reviews, file reviews, and redress exercises

Other

- appropriate implementation of whistleblowing processes and procedures including assessing the adequacy of investigations
- firms' oversight of appointed representatives.

In addition, technical expertise in assessing additional considerations for wholesale market conduct, including:

- upholding market integrity
- ensuring effective market abuse systems and controls
- managing conflicts and ensuring markets remain orderly in a range of market conditions.

This will include assessing firms of various sizes and require skills, experience and expertise in a wide variety of product types and against all relevant regulatory and legal requirements including but not limited to the FCA Handbook, industry standards and best practice.

Lot E: Financial Crime

Advice, skills and technical expertise in assessing financial crime systems and controls (money laundering, anti-bribery and corruption, sanctions, terrorist financing, proliferation financing and fraud) and the effective governance of these areas.

This should include, but not be limited to, knowledge of relevant regulatory requirements, standards, guidelines, industry best practice, and legislation – including experience and expertise in assessing the adequacy of firms' oversight, systems, controls, and compliance with the following:

- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Financial Services and Markets Act 2000
- Proceeds of Crime Act 2002
- Terrorism Act 2000
- Terrorism Act 2006
- Economic Crime and Corporate Transparency Act 2023
- Anti-Terrorism, Crime and Security Act 2001
- Sanctions and Anti-Money Laundering Act 2018

- Fraud Act 2006
- Payment Services Regulations 2017
- Electronic Money Regulations 2011
- Relevant FCA SYSC rules
- Joint Money Laundering Steering Group guidance
- FCA Financial Crime Guidance
- FCA Financial Crime Thematic Reviews.

Lot F: Market Abuse

Advice, skills and technical expertise in relation to market abuse and market abuse surveillance (including insider dealing and market manipulation) and the effective governance of these areas.

This will include skills, experience and expertise in assessing the adequacy of firms' systems and controls, and the investigation of areas including, but not limited to:

- the UK Market Abuse Regulation (UK MAR)
- the Suspicious Transaction and Order Reports (STOR) regime
- relevant SYSC rules
- Economic Crime and Corporate Transparency Act 2023.

Lot G: Prudential – Deposit takers, recognised clearing houses, Central Securities Depositories and PRA-designated investment firms

Advice, skills and technical expertise in assessing whether firms have effective prudential arrangements and how these support safety and soundness and/or financial and operational resilience.

This should include, but not be limited to, knowledge of relevant national and international regulatory requirements, standards, guidelines and industry best practice and experience and expertise in:

- assessing and modelling risks (including, credit risk; traded risk; interest rate risk, liquidity and treasury risk; operational risk; settlement risk; cryptoasset technology risk; and climate risk)
- calculating and modelling prudential requirements (including for capital, liquidity, large exposures, and non-financial resources)
- reviewing the preparation and reporting of regulatory returns and disclosures
- business, capital and liquidity planning (including ICAAPs, ILAAPs and stress tests, and for mergers, acquisitions and transfer of business)
- recovery and resolution planning, implementation, and reporting (including Resolution Assessments).

Lot H: Prudential – Insurance

Advice, skills and technical expertise in assessing whether firms have effective prudential arrangements and how these support safety and soundness and/or policyholder protection.

This should include, but not be limited to, knowledge of relevant national and international regulatory requirements, standards, guidelines and industry best practice and experience and expertise in:

- assessing risks arising from life and/or non-life insurance business, (including insurance risk, credit risk, market risk, counterparty default risk, operational risk, liquidity risk and climate risk)

- business, capital and liquidity planning (including stress tests, mergers and acquisitions and transfers of business)
- reserving and technical provisions
- underwriting, claims handling and pricing
- capital modelling – build and review, including the ability to assess insurance firms’ validation of internal models
- reinsurance modelling and exposure management, including catastrophe risk,
- actuarial modelling
- asset-liability management
- insurance Special Purpose Vehicles, insurance linked securities and valuation of assets,
- merger and acquisition due diligence
- reviewing the preparation and reporting of regulatory returns
- recovery, solvent exit and resolution planning
- captives (captives set-up, captives risk management including setting capital and technical provisions).

Lot I: Prudential - Adequate Financial Resources for FCA Solo-regulated Firms

Advice, skills and technical expertise in evaluating whether solo-regulated firms have effective prudential arrangements, and adequate financial resources to ensure they meet threshold conditions and on-going regulatory requirements.

This will require skills, experience and expertise across different prudential regimes, the FCA Handbook, FCA published guidance, International Accounting Standards, International Financial Reporting Standards and UK Generally Accepted Accounting Practice.

This should include, but not be limited to, knowledge of relevant regulatory requirements, standards, guidelines and industry best practice and experience and expertise in assessing:

- firm’s skills, systems and processes to calculate and hold appropriate level and type of capital and/or liquid resources to cover potential harm, and to put things right when they go wrong
- firm’s skills, systems and processes to evaluate the viability and sustainability of their own business model and strategy; whereby firms consider forward-looking financial projections and strategic plans, under both business-as-usual and adverse circumstances that are outside their normal and direct control. The assessment of tail risk analysis should include elements like the stress test, reverse stress test and wind-down planning, together with the adequacy of the scenarios, its modelling and the governance of these areas
- the preparation and reporting of regulatory returns and disclosures.

Skills, experience and technical expertise should include but not be limited to:

- credit, market, liquidity and operational risk
- trading book: market risk, settlement risk, large exposures and/or the modelling of these risks, as well as regulatory reporting
- any other risks that are inherent to the firm’s business model and that can lead to impair its ability to compensate for harm done

- business, capital and liquidity planning (including Internal Capital and Risk Assessments (ICARAs), liquidity and stress tests, and for mergers, acquisitions and transfer of business)
- recovery and resolution planning, implementation and reporting (including Resolution Assessments).

Lot J: Information and Communications Technology and Cyber Risk and Resilience Management

Advice, skills and technical expertise in assessing whether regulated firms (or designated Critical Third Parties) have effective Information and Communications Technology (ICT) and cyber operational risk and resiliency management and culture to support safety and soundness / policy holder protection and / or operational resilience.

This should include but not be limited to:

- Knowledge of relevant national and international regulatory requirements, standards, guidelines and industry good practice, including:
 - Supervisory Statement (SS) 1/21 and Policy Statement (PS) 21/3; SS6/24 and PS24/16; and SS2/21
 - Configuration of ICT infrastructure standards such as Internet Protocol Security (IPSEC)
 - ICT control frameworks, such as Control Objectives for Information and Related Technologies (COBIT), International Organisation for Standardisation (ISO) standards and Information Technology Infrastructure Library (ITIL)
 - Cyber and information security standards and frameworks such as National Institute of Standards and Technology (NIST), ISO27001 and family, NIST SP 800 Series, Open Web Application Security Project (OWASP), Centre for Internet Security (CIS), and SysAdmin, Audit, Network and Security Institute (SANS)
 - Project and programme management good practices such as PRINCE2 and MSP
 - Software development life cycles such as SSADM and RAD
 - Relevant ICT infrastructure, systems and application software.
- and experience and expertise in:
 - ICT strategy, governance and culture
 - ICT risk management
 - Cyber and information security, governance and risk management
 - Threat intelligence and hunting
 - Security Operations (SOC)
 - Cyber response and recovery
 - Vulnerability management
 - Cryptography
 - Service mapping and design, systems architecture, development and maintenance
 - Incident and problem management, including playbooks
 - Project and change management, including transformation programmes, and associated risk management
 - Performance and capacity management
 - Data integrity, quality and migration
 - Identity and accesses management
 - Physical Environment security

- o Service continuity, testing and business continuity and disaster recovery management including response and recovery processes to mitigate severe but plausible scenarios
- o Third party management (third party risks from outsourced and offshore activities, including cloud services etc.), and service termination to minimise disruption
- o Regulatory Technology (RegTech), including regulatory compliance and reporting.

Lot K – Threat Intelligence and Penetration Testing

Provision of services by suppliers with a CBEST or STAR-FS accreditation in the following areas:

- Threat Intelligence (TI)
- Penetration Testing (PT)

A Threat Intelligence supplier is required to have a CREST accredited CCTIM - CREST Certified Threat Intelligence Manager.

A Penetration Testing supplier is required to have CREST accredited CCSAM – CREST Certified Simulated Attack Manager/CCRTM – CREST Certified Red Team Manager and CCSAS - CREST Certified Simulated Attack Specialist/CCRTS – CREST Certified Red Team Specialist

Lot M: Trade and Transaction Reporting

Advice, skills and technical expertise in assessing the design and operational effectiveness of a firm’s trade and transaction reporting processes, reporting logic, systems and controls, and change management.

This should include technology backed capability for data completeness and accuracy testing for one or more of the following regulatory reporting regimes:

- Transaction reporting requirements in UK MiFIR and Commission Delegated Regulation (EU) 2017/590 (UK RTS 22)
- Instrument reference data requirements in UK MiFIR and Commission Delegated Regulation (EU) 2017/585 (UK RTS 23)
- The Regulatory Technical Standards for the maintenance of relevant data relating to orders in financial instruments: Commission Delegated Regulation (EU) 2017/580 (UK RTS 24)
- Trade reporting requirements in UK MiFIR, Commission Delegated Regulation (EU) 2017/587 (UK RTS 1) and Commission Delegated Regulation (EU) 2017/583 (UK RTS 2)
- Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories
- EMIR Technical Standards on the Minimum Details of the Data to be Reported to Trade Repositories 2023; and on the Standards, Formats, Frequency and Methods and Arrangements for Reporting 2023

- The Technical Standards (Securities Financing Transactions Regulation) (EU Exit) (No 1 and No 2) Instrument 2020.

In the context of the above regimes, this will include making recommendations for improvements to any weaknesses identified on the:

- effectiveness of the policies and procedures
- incident management process, escalation protocols and compliance risk management
- reconciliation and exception management process
- data governance, lineage and traceability
- governance, operating model, senior management oversight and audit
- training, regulatory awareness and engagement, and culture in relation to regulatory reporting.