

Helping you get

**CREDIT
READY**



Step-by-step guide:

7. Compliance

Helping you complete your online application





Step-by-step guide:

7. Compliance

The purpose of this section is to confirm that your company has certain procedures and documents in place. Here is what you will need to complete it:

What you will need for this section:

- Your firm's Compliance Procedures
- Your firm's Compliance Monitoring Programme
- Details of your firm's financial crime procedures
- Your firm's procedures on disclosure (as detailed in Consumer Credit Sourcebook 4 (CONC))


Compliance Procedures:

You do not need to attach the actual documents, but you must make sure they are available for inspection in the future.

Tick this box if your Compliance Procedures documents are available.

Compliance Procedures

The Applicant is not required to send compliance procedures with this application, but must be able to produce a copy at any time while we are assessing the application or in the future.

Please tick to confirm that the Applicant has documented compliance procedures in place. | 

Refer to Guidance on Compliance Procedures.

Compliance Monitoring Programme:

This must be tailored to your business, and take into account the type of regulated activity your firm intends to carry out.

Here is a list of what needs to be in it.

You will need to provide a document giving details of your firm's Compliance Monitoring Programme. Here is where to attach it.

You also have the option to click **SEND LATER**. Then after you have submitted your application, you will receive an email requesting the document. To help avoid delay, for any documents you have indicated as 'send later', follow instructions within the confirmation email you will receive when you submit your application.

Compliance Monitoring Programme

The Applicant must establish, maintain and carry out a programme of actions to check that it complies and continues to comply with its compliance procedures. This is called a compliance monitoring programme, which must be sent with this application. There is an example of one in the guidance notes.

The compliance monitoring programme must be relevant to the regulated activities the Applicant wishes to carry on and to its business, so the compliance monitoring programme must be tailored to the Applicant's business.


A compliance monitoring programme must describe the actions the holder of the compliance oversight function and their staff will take to ensure the Applicant complies with the FCA's rules and guidance at all times, in particular:

- what checks will take place
- how often the checks will take place, as appropriate to the procedure being checked - this might be daily, weekly, monthly, quarterly, annually or another period specified by the FCA;
- who will carry out the checks - this is the role of the person who will make the check, such as the Compliance Officer, Training and Competence Officer, Money Laundering Reporting Officer; and
- what records of the checks will be kept to confirm they have taken place.

Please attach a copy of your compliance monitoring programme document

Document Title

Attachment

Send later 

Financial Crime:

Your firm must also have in place procedures to avoid being used by third parties to commit financial crimes.

Here is a list of what these procedures should include.

Type in a summary of your firm's Financial Crime Procedures here.

Financial Crime

The Applicant must have in place procedures to counter the risks that it might be used by third parties to further financial crime. This includes any offence involving :

- o fraud or dishonesty,
- o misconduct in, or misuse of information relating to, financial markets or
- o handling the proceeds of crime (SYSC 3.2.6 and 6.3).

Please include the following:

- o the steps the Applicant will take to ensure its Money Laundering Reporting Officer (MLRO) knows their duties and is able to perform their controlled function effectively;
- o the procedures that will be in place to ensure that the Applicant will obtain sufficient evidence of the identity of and undertake all necessary due diligence exercises in relation all its clients;
- o the systems and controls that will be in place to ensure that know your business information (see SYSC 3.2.6 and 6.3) is made available to the applicant firm's MLRO;
- o the anti-money laundering training the Applicant will provide for all its relevant staff; and
- o the disciplinary procedures for any member of staff who fails to report promptly to the MLRO any suspicions or belief that money laundering is occurring.

This could be a summary of the Applicant Firms money laundering procedures. For more information see guidance notes Financial Crime.

Disclosure requirements:

Your firm must have procedures to comply with rules on disclosure, as detailed in [Consumer Credit Sourcebook 4 \(CONC\)](#).

No need to attach the documents, just tick the box to confirm that they are all in order.

Lastly, if your firm charges for credit broking services you will need to give some details here.

Please tick this box to confirm that the Applicant has procedures in place to comply with the disclosure requirement in CONC 4, <http://fshandbook.info/FS/html/handbook/CONC>, applicable to the intended business of the applicant and that these (including any template documents) are available for inspection.

Does the Applicant have procedures to deal with arrears of debt?

Will the Applicant be a home collected lender or broker?

Will the Applicant be charging any up front fees for its credit broking services?

Please provide full details of these fees, how they are communicated to customers and the applicants policy in relation to refunds of these fees

If you need to know more about the procedures or documents mentioned in this section, please refer to the guide to completing your application.

[Limited permission](#)

[Full permission](#)

There are guides for different sections of the application. So if you'd like further help please visit our [website](#).