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(By email)

xx April 2016

Our Ref: FOI4417

Freedom of Information : Right to know request

We refer to your request under the Freedom of Information Act 2000 (the Act), for the following information:

- "1. An estimate of the number of individuals who will come under the Senior Managers' Regime upon its introduction on March 7 2016.*
- 2. An estimate of the number of individuals that will be allocated to each of the prescribed responsibilities under the Senior Managers' Regime on March 7 2016 (ie list of prescribed responsibilities and number estimates to hold each of these).*
- 3. The total number of approved persons currently registered with the FCA."*

We apologise for the delay in responding.

Your request has now been considered and we can confirm that we hold the information you have requested.

As background, in June 2013 the Parliamentary Commission for Banking Standards (PCBS) published its report "Changing Banking for Good", setting out recommendations for legislative and other action to improve professional standards and culture in the UK banking industry. This was followed by legislation in the Banking Reform Act 2013 to replace the Approved Persons Regime for banks, building societies, credit unions and PRA-designated investment firms with a new regulatory framework for individuals.

While the Senior Managers Regime will ensure that senior managers can be held accountable for any misconduct that falls within their areas of responsibilities, the new Certification Regime and Conduct Rules aim to hold individuals working at all levels in banking to appropriate standards of conduct.

More information can be found on our website at the following link:

<https://www.fca.org.uk/news/fca-publishes-final-rules-to-make-those-in-the-banking-sector-more-accountable>

Turning now to your request, we will address each point in turn

1. An estimate of the number of individuals who will come under the Senior Managers' Regime upon its introduction on March 7 2016.

As at 7 March 2016 there were c. 4,500 individuals under the Senior Managers Regime (SMR). The SMR applies to Relevant Authorised Persons (RAP)* firms.

Please note that these figures change constantly as we process BAU applications.

** Banks, building societies, credit unions and PRA designated investment firms*

2. An estimate of the number of individuals that will be allocated to each of the prescribed responsibilities under the Senior Managers' Regime on March 7 2016 (i.e. list of prescribed responsibilities and number estimates to hold each of these).

As at 7 March 2016 a total of 3,159 individuals had been allocated a prescribed responsibility (by their firm), broken down as follows:

Function	Description	Number
A	Responsibility for the firm's performance of its obligations under the senior management regime;	1,038
B	Responsibility for the firm's performance of its obligations under the certification rules;	948
C	Responsibility for compliance with the firm's obligations in relation to its management responsibilities map;	984
D	Overall responsibility for the <i>firm's</i> policies and procedures for countering the risk that the <i>firm</i> might be used to further <i>financial crime</i>	794
E	Responsibility for the allocation of all prescribed responsibilities;	981
F	Responsibility for: a) leading the development of; and b) monitoring the effective implementation of; policies and procedures for the induction, training and professional development of all members of the firm's governing body.	149
G	Responsibility for monitoring the effective implementation of policies and procedures for induction, training and professional development of all persons performing designated senior management functions on behalf of the firm other than members of the governing body	160
H	Responsibility for overseeing the adoption of the firm's culture in the day-to-day management of the firm	162
I	Responsibility for leading the development of the firm's culture by the governing body as a whole	152
J	Responsibility for: a) safeguarding the independence of; and b) oversight of the performance of: the internal audit function in accordance with SYSC 6.2 (Internal Audit)	143

K	Responsibility for: a) safeguarding the independence of; and b) oversight of the performance of; Compliance in accordance with SYSC 6.1 (Compliance)	144
L	Responsibility for: a) safeguarding the independence of; and b) oversight of the risk function in accordance with SYSC7.1.21R and SYSC 7.1.122R (Risk control)	150
M	Responsibility for overseeing the development of, and implementation of the firm's remuneration policies and practices in accordance with SYSC 19D (Remuneration Code)	138
N	Responsibility for the independence, autonomy and effectiveness of the firm's policies and procedures on whistleblowing, including the procedures for protection of staff who raise concerns from detrimental treatment	335
O	Management of the allocation and maintenance of capital, funding and liquidity	165
P	The firm's treasury management functions	155
Q	The production and integrity of the firm's financial information and its regulatory reporting in respect of its regulated activities	163
R	The firm's recovery plan and resolution pack and overseeing the internal processes regarding their governance	159
S	Responsibility for managing the firm's internal stress-tests and ensuring the accuracy and timeliness of information provided to the PRA and other regulatory bodies for the purpose of stress-testing	166
T	Responsibility for development and maintenance of the firm's business model by the governing body	161
U	Responsibility for the firm's performance of its obligations under the Fitness and Propriety (in the PRA Rulebook) in respect of its notified non-executive directors	315
V	If the firm carries out proprietary trading, responsibility for the firm's proprietary trading activities;	32
W	If the firm does not have an individual performing the Chief Risk function, overseeing and demonstrating that the risk management policies and procedures which the firm has adopted in accordance with SYSC 7.1.2 R to SYSC 7.1.5 R satisfy the requirements of those rules and are consistently effective in accordance with SYSC 4.1.1R	22
X	If the firm outsources its internal audit function taking reasonable steps to ensure that every person involved in the performance of the service is independent from the persons who performs the external audit, including a) Supervision and management of the work of outsourced internal auditors and b) Management of potential conflicts of interest between the provision of external audit and	64

	internal audit services	
Y	If the firm is a ring fenced body, responsibility for ensuring that those aspects of the firm's affairs for which a person is responsible for the managing are in compliance with the ring-fencing requirements	35
Z	Overall responsibility for the firm's compliance with CASS	212
Non EEA branch Prescribed Responsibilities (za – zl)		
Function	Description	Number
za	Responsibility for the branch's performance of its obligations under the senior management regime	73
zb	Responsibility for the branch's performance of its obligations under the employee certification regime	72
zc	Responsibility for compliance with the requirements of the regulatory system about the management responsibilities map	76
zd	Responsibility for management of the UK branch's risk management processes in the UK	67
ze	Responsibility for the branch's compliance with the UK regulatory regime applicable to the branch	75
zf	Responsibility for the escalation of correspondence from the PRA, FCA and other regulators in respect of the branch to the governing body and/or the management body of the firm or, where appropriate, of the parent undertaking or holding company of the firm's group	79
zg	Local responsibility for the branch's policies and procedures for countering the risk that the branch might be used to further financial crime	76
zh	Local responsibility for the branch's compliance with CASS	43
zi	Responsibility for management of the branch's systems and controls in the UK	73
zj	Responsibility for the allocation of all UK branch prescribed responsibilities	72
zk	Responsibility for the management of the branch's liquidity or, where a liquidity waiver is in place, the submission of information to the PRA on the firm's liquidity position	61
zl	Responsibility for the production and integrity of the branch's financial information and its regulatory reporting in respect of its regulated activities	66

AA	Small Firm Risk Management	749
BB	Small Firm Systems and Controls	736
CC	Small Firm Financial Resources	735
DD	Small Firm Governing Body Obligations	714

Notes:

- 1. All UK RAP firms are required to allocate Prescribed Responsibilities A – E to a senior manager.*
- 2. Responsibilities F – U apply to larger firms, while AA – DD apply to small firms. Small firms are firms with gross assets of £250m or less.*
- 3. Responsibilities V – Z only apply in certain circumstances (e.g. Responsibility Z is only applicable to firms that hold client money).*
- 4. Not all Senior Managers will hold Prescribed Responsibilities, whilst some will hold more than one – further information can be found in the PRA/FCA Handbooks.*

3. The total number of approved persons currently registered with the FCA.

c. 132,000

Yours sincerely

Information Access Team
Financial Conduct Authority