

Managing bribery and corruption risk in commercial insurance broking

Update

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Abbreviations used in this report

ABC Anti-Bribery and Corruption

CDD Customer Due Diligence

FCA Financial Conduct Authority

FSA Financial Services Authority

MI Management Information

PEP Politically Exposed Person

1. Overview

Introduction

This report sets out the findings of our thematic review into how wholesale insurance intermediaries (intermediaries) manage their bribery and corruption risks. Our work assesses intermediaries' progress since the publication of the Financial Services Authority (FSA) report in 2010 on *Anti-bribery and corruption in commercial insurance broking*.¹

In the 2010 report, we focused on how intermediaries managed their risk of making corrupt payments to third parties. We identified serious weaknesses in some intermediaries' anti-bribery and corruption (ABC) systems and controls. We concluded that there was a significant risk that intermediaries might make illicit payments or inducements to, or on behalf of, third parties to win business. Since 2010, we have also published *Financial crime: a guide for firms*, which provides guidance on steps intermediaries can take to reduce their bribery and corruption risk.² And we have taken enforcement action against four intermediaries for failings in their ABC systems and controls.³

The purpose of this review was not only to assess how the sector had responded to the specific issues identified in 2010 and our subsequent work, but also to consider whether intermediaries were adequately addressing bribery and corruption risk across their wider business. We looked at intermediaries' bribery and corruption risk assessments and considered how this risk was controlled through intermediaries' governance, due diligence and ongoing monitoring of individual relationships, payment controls, recruitment and remuneration, training and awareness, incident reporting and whistleblowing.

A summary of our specific findings are detailed in Chapter 2 of this report. We provide examples of good practice in Chapter 3.

What we did

We visited ten intermediaries between October 2013 and June 2014. Five of these intermediaries had been part of the 2009/10 FSA review and five were selected from the remaining population of intermediaries.

1 Anti-bribery and corruption systems and controls in commercial insurance broking. This followed a letter we had sent to all CEOs of intermediaries which reminded them of their obligation to mitigate bribery and corruption risk. You can read the letter [here](#).

2 Financial crime: a guide for firms. See in Particular Part 1 Chapter 6 and Part 2 Chapters 9 and 13.

3 Aon Ltd (2009) - <http://www.fca.org.uk/your-fca/documents/final-notices/2009/fsa-final-notice-2009-aon-limited>; Willis (2011) - <http://www.fca.org.uk/your-fca/documents/final-notices/2011/fsa-final-notice-2011-willis-limited>; JLTSL (2013) - <https://www.fca.org.uk/static/documents/final-notices/jlt-specialty-limited.pdf>; and Besso Ltd (2014) <http://www.fca.org.uk/your-fca/documents/final-notices/2014/besso-limited>.

All intermediaries were medium-size or smaller, including nine Lloyd's brokers. Our work was part of a wider thematic review of smaller firms' financial crime systems and controls.⁴

Legal and regulatory obligations

Our rules require intermediaries to put in place and maintain systems and controls to manage bribery and corruption risk, and to conduct their business with integrity. This means that intermediaries must identify, assess and mitigate bribery and corruption risk, and take reasonable steps to prevent this risk crystallising in their business. Our review considered all of these areas but it did not seek to establish whether intermediaries were complying with the Bribery Act 2010, which makes a failure to prevent bribery a criminal offence.

Key messages

Overall, most intermediaries in our sample did not yet adequately manage the risk that they might become involved in bribery or corruption. More than half of the intermediaries in our sample had taken some steps to assess and manage bribery and corruption risk, but for the majority of these intermediaries, this work was still in progress and more had to be done before their ABC systems and controls would be fully effective. This included some firms visited in the last review. We were pleased to see that most intermediaries in our sample had considered our previous work when reviewing their ABC systems and controls, but we were concerned that three intermediaries we had not previously visited were unaware of it.

While further improvement is required, there were some areas in which considerable progress had been made. In particular, intermediaries' management of the bribery and corruption risk posed by their staff - for example, their remuneration policies, gifts and hospitality policies, and ABC training, had all improved since our previous review.

We summarise the key messages from our overall findings below, including those areas where we detected significant weaknesses across our sample of intermediaries.

- **Business-wide risk assessments:** only half of all intermediaries in our sample adequately identified and assessed bribery and corruption risk across both the trading and non-trading aspects of their business.

The remaining intermediaries had either not carried out a business-wide bribery and corruption risk assessment, or had only focused on the risks associated with a limited number of relationships (i.e. only considering the next entity in the insurance chain) rather than assessing the risks associated with all parties in the insurance distribution chain.

Without a comprehensive risk assessment, intermediaries are less able to identify where their exposure is greatest and how to allocate resource effectively to mitigate key risks.

⁴ This thematic review also considered smaller banks' anti-money laundering and sanctions systems and controls, our report on which can be found [here](#).

- **Individual relationships risk assessments:** most intermediaries in our sample assessed bribery and corruption risk associated with individual relationships, but rarely did so holistically. The due diligence that intermediaries carried out when assessing individual relationships was often inadequate. In some cases, assessments were based on a single factor, such as jurisdiction.

Where intermediaries did consider other factors they often did not ‘join the dots’ to give an overall risk rating. Most intermediaries in our sample did not adapt levels of due diligence, sign-off or monitoring to reflect the risks a certain relationship presented. And files were patchy, leaving intermediaries with a limited picture of key information.

Risk assessments of individual relationships should inform the intermediary’s overall risk assessment. If they are flawed, this can undermine the organisation’s risk mitigation.

- **Governance and Management Information:** while we were encouraged that most intermediaries in our sample had appointed a senior manager with responsibility for managing bribery and corruption risk, we also found that senior management often had very limited access to meaningful information about the intermediaries’ exposure to bribery and corruption risk. This meant that oversight of risk management was often weak.

Our findings in Chapter 2 include a number of other areas that were assessed.

What happens next?

Intermediaries cannot effectively mitigate their bribery and corruption risks where the failures outlined above continue. Our sample of firms were primarily Lloyd’s intermediaries dealing with international wholesale business, but we expect all commercial insurance intermediaries (particularly those who act on a wholesale basis and/or deal with overseas parties) to consider our findings and assess what steps they can take to improve their overall ABC systems and controls.

We provided individual feedback to the intermediaries in our sample, two of which voluntarily agreed to limit their business with certain third party introducers and clients until they had addressed to our satisfaction the weaknesses we identified. Both intermediaries were required to attest formally to us that they had completed their remedial work.

Given the ongoing problems we found during this review, we are also updating Financial crime: a guide for firms⁵ to share more examples of the good practice we have seen. These examples of good practice are provided in Chapter 3 of this report. This guidance is not only relevant to wholesale insurance intermediaries, other FCA-authorised firms may also find it useful. We are consulting on these changes to our guidance [here](#).

⁵ Financial crime: a guide for firms. See in Particular Part 1 Chapter 6 and Part 2 Chapters 9 and 13 <http://fshandbook.info/FS/html/FCA/FC/link/PDF>.

2. Findings

Here we set out our findings from all the visits we conducted. We illustrate some specific examples of good (highlighted in red) and poor (highlighted in grey) practice identified in these visits. We have also set out examples of good practice more fully in Chapter 3.

Governance and Management Information

An intermediary's senior management is responsible for ensuring that the organisation conducts its business with integrity and tackles the risk that the intermediary or anyone acting on its behalf engages in bribery and corruption. Keeping up to date with bribery and corruption issues that affect the intermediary is necessary for this.

It is good practice for intermediaries to apportion responsibility for ABC systems and controls to a senior manager or to a committee with appropriate terms of reference.

One intermediary had created the role of Anti-Corruption Officer to act as a focal point and raise awareness of bribery and corruption risk among front line staff. This was in addition to the senior manager with responsibility for managing bribery and corruption risk. The intermediary assigned the Anti-Corruption Officer role to a Managing Director to increase visibility of the firm's commitment to address bribery and corruption risk to both staff and customers.

In 2010, we found that, although most intermediaries in our sample had appointed a senior manager with responsibility for managing bribery and corruption risk, the appointed individual often had a limited understanding of the bribery and corruption risk faced by their firm. This was partly because of a lack of adequate management information on bribery and corruption issues.

We found that eight of the intermediaries we visited in 2013/14 had apportioned responsibility for ABC systems and controls to a senior manager. These senior managers were aware of bribery and corruption issues in general, but several were unable to rely on adequate management information. Where management information was inadequate, we were not satisfied that the senior manager had sufficient oversight of the bribery and corruption risk to which their business was exposed.

Two intermediaries had not appointed a senior manager with ABC responsibility and it was not clear who had oversight of these intermediaries' ABC systems and controls. At another intermediary, we were particularly concerned that the appointed senior manager had limited ABC expertise; leaving the firm open to potential bribery and corruption risks.

For proposed guidance on governance and management information please see the relevant heading in Chapter 3.

Risk assessment

We expect intermediaries to identify and assess bribery and corruption risk. This is the risk that the intermediary, or anyone acting on the intermediary's behalf, engages in bribery or corruption. Our guidance makes it clear that we expect intermediaries' risk assessments to be comprehensive, and that the risk assessment process should be continuous and based on the best information available to the firm. We also expect intermediaries to carry out risk assessments that are proportionate to the nature, scale and complexity of their activities.

In 2010, the FSA found that most intermediaries in our sample had carried out some form of bribery and corruption risk assessment on individual relationships. However, some of the risk ratings for these relationships had been determined solely from the risk of the jurisdiction concerned, based on the Transparency International Corruption Perceptions Index.⁶ We found that other factors – such as how much and how the intermediary is remunerated for its work, the insurance sector or class of business involved, any political or governmental connections, whether the entity was an individual or a corporate entity, and the results of due diligence – had not been factored into the risk assessment. Most intermediaries in our sample had also failed to use risk assessments to ensure their systems and controls were adjusted to, and commensurate with, the risk identified.

Overall, we found that the quality of risk assessments of individual relationships – and the controls that complement and build on those risk assessments, such as due diligence and monitoring – had not improved. This can leave firms exposed to significant bribery and corruption risk.

Business-wide risk assessments

Since we expect intermediaries' risk assessments to be comprehensive, we expect them to consider bribery and corruption risk across their entire business. Business-wide risk assessments should cover both trading and non-trading elements of the business. They should help intermediaries to identify where their risk exposure is greatest and how to allocate ABC resource – for example, it will identify higher-risk situations where additional due diligence would be appropriate.

We found that only five intermediaries had carried out a business-wide bribery and corruption risk assessment. The remainder had either not carried out a bribery and corruption risk assessment at all, or had largely restricted the scope of this work to assessing the risks arising from a limited number of relationships with, for example, third party introducers or producing brokers.

⁶ <http://www.transparency.org/research/cpi/>.

Generally intermediaries did not consider such things as their overall exposure to jurisdictions and sectors, and risks posed by governance structures and other non-trading aspects of the business.

Intermediaries had made only a limited attempt to understand the risks associated with the different parties in the insurance chain, beyond their immediate relationships. We expect intermediaries to consider the risks associated with all relationships within the insurance distribution chain to determine the level of due diligence required for each party.

Risk assessments and due diligence on individual relationships

Most of the intermediaries we visited were risk-assessing individual relationships, but as we found in our previous review, this was sometimes based on only one risk factor, most often being jurisdiction. Intermediaries rarely took a holistic view of the risk associated with that relationship, e.g. by factoring in how much and how it is remunerated for its work, the risk associated with the insurance sector or class of business, any political or governmental connections, whether the entity was an individual or a corporate entity, and the results of the due diligence carried out.

One intermediary had developed a risk assessment process that involved a range of risk factors, including jurisdiction, product and business volume. But they did not then aggregate the individual risk scores in a meaningful way to produce an overall risk rating that would then drive the level and extent of the due diligence performed on this relationship.

We found that, despite the FSA criticism of the quality of intermediaries' due diligence in 2010, there remained significant due diligence weaknesses in nearly half of the individual relationship files we reviewed. These included intermediaries' failure to record key information properly, including Terms of Business agreements, and information about the company and its owners. In the case of third party introducers and other intermediaries in the distribution chain, the business rationale for their inclusion in the chain was often not clearly documented.

A file at one intermediary gave the business rationale for a third party introducing insurance from a high-risk jurisdiction simply as 'business from [this jurisdiction's] energy market'. Overall, this file contained very limited evidence of due diligence checks being carried out regarding the integrity of the third party introducer.

We also found that most intermediaries in our sample applied the same levels of due diligence, sign-off and ongoing monitoring to all their relationships, regardless of the risk classifications they had been given. Despite the fact most intermediaries in our sample now have access to commercially-available intelligence databases to screen relationships in the insurance distribution chain, some intermediaries did not use these systems consistently or effectively.

One intermediary had risk-rated each of its third party introducers before our visit, however the quality and quantity of due diligence, the level of sign-off required, and the frequency of monitoring was the same even though these introducers had different risk categories.

Policies and procedures at most of the intermediaries we visited did not require approval of a higher-risk relationship at a more senior level, for example a dedicated senior manager or committee set up for this purpose. As a result, few intermediaries obtained senior level approval of higher-risk relationships.

We were not confident that intermediaries always had enough information to understand the bribery and corruption risk associated with their individual relationships. We were concerned that this meant that these intermediaries were not focusing mitigation efforts on those areas where the levels of bribery and corruption risk were greatest.

One intermediary had not considered the potential bribery and corruption risks when it took on a relation of a client as a third party introducer, even though the plan was for him to introduce business from some high-risk jurisdictions.

For proposed guidance on risk assessment please see the relevant heading in Chapter 3.

Ongoing monitoring and reviews

Intermediaries should monitor and review their individual relationships using a risk-based approach, to ensure their understanding of the risk associated with these relationships remains current and is managed appropriately.

In 2010 the FSA found that, historically, most intermediaries in its sample had not reviewed their individual relationships but that this had begun to change, with several intermediaries implementing reviews of their existing relationships in light of the regulatory action the FSA had taken up to that time.

The progress made on the ongoing monitoring and review of relationships has been slow. Many intermediaries' endeavours to keep their understanding of their relationships with clients, intermediaries and other parties in the distribution chain up to date were not adequate. Less than half of the third party or client due diligence files that we reviewed provided evidence of meaningful ongoing monitoring or review. Only one intermediary had introduced an ongoing monitoring system in which higher-risk relationships were monitored on a more frequent basis.

One intermediary considered that copying senior managers into all emails relating to third party introducers and clients was an adequate way to monitor relationships. It had failed to maintain and refresh relevant information about these relationships.

For proposed guidance on ongoing monitoring and reviews please see the relevant heading in Chapter 3.

Payment controls – insurance broking accounts

Systems and controls to prevent corrupt payments being made are an important line of defence.

Poor quality due diligence on clients, third party introducers and other parties in the distribution chain, which we identified in our last review and found again in this review (see risk assessments and due diligence on individual relationships, above) reduces the effectiveness of insurance broking payments systems as a risk mitigant.

At two intermediaries, payment monitoring consisted solely of copying senior managers into emails where commission amounts were discussed.

For proposed guidance on payment controls in insurance broking accounts please see the relevant heading in Chapter 3.

Payment controls – accounts payable

Intermediaries should be aware of the risk that accounts payable could be used to make illicit payments to third parties who have not been subject to due diligence and/or been approved.

In our last review, we found that policies and procedures over staff expenses and accounts payable were generally adequate, but not all intermediaries had limits on entertaining and other business expenses. There was also little evidence that intermediaries considered how to use accounts payable to mitigate bribery and corruption risk.

Most intermediaries in our sample now had documented policies and procedures on gifts, entertainment, expenses and donations, which included guidelines on appropriate limits where appropriate. Staff were generally required to produce receipts for expenses incurred, and a number of intermediaries had set limits for gifts and entertainment. But we did see some examples of inadequate challenge by those approving expenses claims and of senior managers approving their own expenses without independent oversight or challenge.

We also found a wide range in the thresholds above which senior management approval was required for the payment of gifts and hospitality. These thresholds ranged from approximately £100 to £750. Most intermediaries in our sample were unable to explain how these limits had been determined. It is important that intermediaries set thresholds that enable them to identify claims for gifts or hospitality that are outside the normal and acceptable levels for their business, so that any potential illicit payments can be identified and prevented.

Some intermediaries kept records of expenses requests from staff that had been declined. These helped managers to identify possible breaches of procedures by staff.

For proposed guidance on payment controls within accounts payable please see the relevant heading in Chapter 3.

Recruitment and remuneration

Intermediaries should manage the risk of staff being rewarded for taking unacceptable financial crime risk, and they should be mindful of financial crime risk when recruiting staff.

In 2010, the FSA found very little evidence that intermediaries had considered the bribery and corruption risk associated with remuneration structures and were concerned that a significant number of intermediaries had bonus structures for broking staff that focused entirely on the income or profit they generated. We felt this encouraged undue risk-taking. We also found that most intermediaries in our sample relied on 'word of mouth' to check candidates' suitability, and very few carried out more formal vetting when recruiting staff.

We were pleased to find that most intermediaries in our sample had implemented remuneration and bonus structures that no longer depended solely on the amount of business generated, and that many had included a compliance element in their remuneration structures. This is likely to encourage a more balanced response from staff, who in the past may have focused much more on the volumes of business generated.

Most intermediaries in our sample now carried out formal pre-employment checks for all staff, which included obtaining a copy of candidates' passports and proof of address. Some intermediaries went further and also carried out credit and criminal records checks or ran searches on World-Check. In addition, a number of intermediaries placed some reliance on word of mouth discussions and recommendations from the market. When added to the formal pre-employment checks, word of mouth discussions and recommendations can help intermediaries gain a better understanding of candidates' suitability.

Training and awareness

Intermediaries must employ staff who possess the skills, knowledge and expertise to carry out their functions effectively. They must also ensure that staff remain competent for their role. This includes the ability to recognise bribery and corruption risk and to comply with their legal and regulatory obligations.

In 2010, only a minority of intermediaries provided relevant anti-bribery and corruption training to staff.

We were pleased to find that most intermediaries in our sample now delivered ABC training to staff, but in three cases this appeared to have been provided as a one-off exercise that was never repeated. Most intermediaries that we visited delivered the same ABC training to all staff, rather than tailoring training to make it relevant to different groups of staff. Few intermediaries provided additional training for staff who may be exposed to higher bribery and corruption risks.

At one intermediary, staff members were expected to refresh their ABC training on a regular basis. However, most of the staff we interviewed were unsure when they last had this training, and the intermediary had failed to keep records of staff training completed.

Only half of the intermediaries visited included a test as part of their ABC training, and few intermediaries had controls in place to satisfy themselves that the bribery and corruption training they provided was effective.

One intermediary used scenario based training, which was followed by a test. They also provided tailored training plans according to the role performed by the employee. We found that staff were notably better informed on ABC as a result of this type of approach to training.

For proposed guidance on training and awareness please see the relevant heading in Chapter 3.

Whistleblowing

As in 2010, we noted a lack of awareness of the benefits of whistleblowing arrangements. Although most intermediaries in our current sample had a formal whistleblowing procedure in place, we found that these had rarely, if ever, been used in practice.⁷

Action since the FSA thematic review of ABC in commercial insurance broking in 2010

Five of the ten intermediaries visited in this project, had previously been visited by the FSA as part of the 2010 ABC thematic review. We were encouraged to find that all of them had carried out a gap analysis taking account of the 2010 report and the related guidance issued. We found some evidence that these intermediaries had responded to the specific issues highlighted in the previous feedback letters they received. There was also evidence that these intermediaries had acted upon the Enforcement Final Notices issued to Aon Ltd, Willis Ltd, JLT Speciality Ltd and Besso Ltd. However, in two cases, we found that remedial work was still in progress. We were generally concerned with the length of time it was taking for these two firms to fully implement the necessary changes to their ABC processes.

⁷ As we stated in our previous published report, we run a Whistleblowing Team for employees in regulated firms who can contact us if previous workplace matters have been ignored and/or if they were not comfortable in making a disclosure at work. Our Whistleblowing line telephone number is 020 7066 9200 or the team can be contacted by email: whistle@fca.org.uk. In addition, the UK charity, 'Public Concern at Work' offers free advice to people with whistleblowing dilemmas and professional support to organisations on how to set up whistleblowing facilities: <http://www.pcaw.org.uk>.

Of the five intermediaries we visited for the first time in this project, three had not considered the 2010 FSA report, regulatory guidance or enforcement cases. The two intermediaries that had carried out a gap analysis still had work to do before their systems and controls could be considered to be adequate.

We were pleased that standards in those intermediaries that had fully considered the findings of the 2010 report, alongside our regulatory guidance, were beginning to improve. However, overall we remain disappointed that not all intermediaries had proactively considered our guidance with a view to satisfying themselves that their ABC systems and controls were adequate to manage the associated risks.

One intermediary had allocated responsibility to a staff member for identifying FCA ABC publications or notifications that require a gap analysis. This was to ensure that the intermediary kept up to date with good ABC practice.

3. Examples of good practice

Here we summarise the examples of good practice that we identified during this review. It builds on our regulatory guidance in Financial crime: a guide for firms. We are consulting on amendments and addition to this guidance [here](#).

Governance

As part of their ABC governance structures, intermediaries may consider appointing an ABC officer with technical expertise and professional credibility within the intermediary.

Management Information (MI)

Examples of ABC MI intermediaries may consider include:

- Details of any business rejected in the relevant period.
- Details, using a risk-based approach, of staff expenses, gifts and hospitality and charitable donations, including claims that were rejected.
- A breakdown of third party introducers and other intermediaries in the chain that are involved in business generation, with details of the business sectors and countries they work in.
- The amount of business each third party introducer or other intermediary generates.
- How much each third party introducer is paid and on what basis (fees, commission etc.).
- Details of the third party introducer's role and why they are necessary.

Payment management information

Examples of payment MI that intermediaries may collect and consider include:

- How many third party introducers and producing brokers are involved in business generation?
- How much business does each one generate?
- How much is each one paid?
- What is each one's role?

- How many third party introducer and producing broker relationships are there?
- In which business sectors and countries do the third party introducers and producing brokers operate?
- Why is a third party introducer a necessary party in the chain?
- Reviewing payments to identify 'red flags' and unusual or suspicious payments.

Risk assessment

Business-wide risk assessments

Intermediaries should identify and assess the bribery and corruption risk across all aspects of their business.

Examples of factors intermediaries should consider when assessing risk across their business include:

- The risks associated with the jurisdictions the intermediary does business in, the sectors they do business with and how they generate business.
- The risks associated with insurance distribution chains, including the risk associated with parties that are not immediate relationships. These may include, in addition to the insured and the insurer, entities such as introducers, sub-brokers, co-brokers, producing brokers, consultants and agents.
- The risks arising from non-trading elements of the business, including staff recruitment and remuneration, corporate hospitality, and charitable donations.

Risk assessments and due diligence for individual relationships

The risk-rating process for individual third party introducer and client relationships, for example the producing broker, should build on the intermediary's business-wide risk assessment.

Examples of factors intermediaries may consider when assessing bribery and corruption risk associated with individual relationships include:

- The role that the party performs in the distribution chain.
- The territory in which it is based or in which it does business.
- How much and how the party is remunerated for this work.
- The risk associated with the industry sector or class of business.
- Any political or governmental connections.

Intermediaries should decide on the level of due diligence, and which party to apply due diligence to, based on their assessment of risk associated with the relationship. This may include other parties in the insurance chain and not just to their immediate contact.

Examples of the type of information intermediaries may obtain as part of the due diligence process include:

- Other intermediary's terms of business and identification documentation.
- Checking, as risk dictates, on company directors, controllers and ultimate beneficial owners. Consider any individuals or company links to the client, PEP screening and status, links to a PEP or national government, sanctions screening, adverse media screening and action taken in relation to any screening hits.
- For third party introducers, details of the business rationale.

Ongoing monitoring and reviews

Examples of ongoing monitoring and review for ABC purposes include:

- Payment monitoring.
- Refreshing CDD documentation.
- Ensuring that the business rationale remains valid.
- Re-scoring risk.
- Updating PEP, sanctions and adverse media screening.
- Taking a risk-based approach to ongoing monitoring measures applied to directors, controllers, ultimate beneficial owners and shareholders relevant to third party relationships, which is consistent with the risk rating applied at the outset of a relationship.

Payment controls – insurance broking accounts

Intermediaries should set meaningful thresholds for gifts and hospitality that reflect business practice and help identify potentially corrupt actions.

When determining whether a payment is appropriate, staff responsible for approving payments should consider whether the payment is in line with expectations created by, among others, the due diligence held by the intermediary.

Payment controls – accounts payable

Intermediaries should consider whether an absence of recorded gifts, entertainment, expenses and donations may be due to reporting thresholds being too high and/or staff being unaware of the requirement to report.

Training and awareness

Examples of initiatives to supplement ABC training include:

- Creating a one page “Aide Memoire” for staff, listing key points about anti-financial crime and the whistleblowing process to which staff could easily refer.
- Appointing a compliance expert within each business area who provides ABC advice to staff.



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