

UNDERSTANDING SYSC WORKSHOP – TWO HALF-DAY PROGRAMME

Background to SYSC

FCA Principles 2 and 3

APER Principles 2, 5-7

MiFID

Proportionality

What bits apply to which firms

SYSC 1.1A.1 – special rules applicable to insurers and Lloyd's

General organizational requirements SYSC 4

Governance

The Board

Responsibility of senior personnel

Apportionment of oversight responsibilities

Organisational structure

Clear lines of responsibility

Processes to identify, manage, monitor and report risks

Personal transaction rules for AIFM UK companies

Internal controls and reporting

Business continuity

Accounting policies

Employees, agents and other persons SYSC 5

Competent employee role

Segregation of duties and conflicts of interest

Compliance, internal audit and financial crime SYSC 6

Policies and procedures to avoid and minimise effects of non-compliance

Compliance function, responsibility, independence and remuneration

Internal audit

Policies and procedures on money laundering and financial crime and the MLRO

Risk management SYSC 7

Risk management, policies and procedures

Independent risk management function

Monitoring risk

Credit, market, interest rate and operational

Outsourcing SYSC 8

Avoiding risks to controls and compliance

Supervision

Continuity risks and contingency plans

Termination rights

Record-keeping SYSC 9

What, how long, storage

Conflicts of Interest SYSC 10

Procedures and policies

Identifying conflicts or potential ones

Recording, managing and disclosing

Chinese walls

Group risk issues SYSC 12

Identifying a group risk

Processes and controls to manage them

Intra-group transactions

Whistleblowing SYSC 18

Procedures

Fit and proper issues