**STATEMENT OF RESPONSIBILITIES (SoR)**

**Name of Individual (Role Holder):**

**Job Title:**

**Individual Reference Number (IRN):**

**Firm Type: Core Firm**

**Name of regulated firm:**

**Firm Reference Number (FRN):**

**Senior Management Functions:**

**Effective Date of SoR: 9th December 2019**

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| **Ref** | **Prescribed Responsibility** | **Shared** |
| (a) | Performance by the firm of its obligations under the SMR, including implementation and oversight | No |
| (b) | Performance by the firm of its obligations under the Certification Regime. | No |
| (b-1) | Performance by the firm of its obligations in respect of notifications and training of the Conduct Rules. | No |
| (d) | Responsibility for the firm’s policies and procedures for countering the risk that the firm might be used to further financial crime. | No |
| (z) | Responsibility for the firm’s compliance with  CASS | No |

| **Ref** | **Prescribed Responsibility** | **Further Relevant Details**  **(Including a breakdown of the different components and tasks which the responsibility encompasses and if applicable details of any sharing arrangements)** |
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| (a) | Performance by the firm of its obligations under the SMR, including implementation and oversight | * A thorough review of responsibilities for business activities in relation to the company directors. * Drawing up the SoRs * Responsibility for Regulatory References * Keeping SoRs up to date * Resubmitting SoRs to the FCA following a significant change * Ensuring the fitness and propriety of Senior Managers. * Carrying out DBS checks as necessary |
| (b) | Performance by the firm of its obligations under the Certification Regime. | * Responsibility for certification of employees * Responsibility for regulatory references as far as they apply to the certification regime. * Responsibility for reporting information about directory persons.   or  Due to the size and the structure of the firm there is currently no one on the Certification Regime.  The need for employee Certification will be monitored and reconsidered as appropriate. |
| (b-1) | Performance by the firm of its obligations in respect of notifications and training of the Conduct Rules. | * Responsibility for all appropriate staff receiving training on the Conduct Rules.   Initial training to be provided for senior managers by 9.12.2019 and for all other staff by 31.03.2021 with refresher courses being run at regular intervals thereafter.   * Responsibility for the disciplinary procedures following a breach of the conduct rules. * Responsibility for notifying the FCA of disciplinary action taken for a breach of the conduct rules. |
| (d) | Responsibility for the firm’s policies and procedures for countering the risk that the firm might be used to further financial crime. | * Drawing up the financial crime policies and procedures covering Money Laundering, Fraud Prevention, Bribery Prevention and Financial Sanctions checking. * Providing training on the financial crime risks facing the firm * Undertaking a risk analysis. * Ensuring recruitment of the right individuals * Remuneration and reward policies. |
| (z) | Responsibility for the firm’s compliance with  CASS | * Accountability for all elements of CASS 5 Client Money: Insurance Distribution Activity * [xxx] is the firm’s client money manager |

| **Title for this overall responsibility** | **Details of Overall Responsibility**  **(SYSC 26.7)The ultimate responsibility is with the governing body and Chief Executive but this individual will manage and supervise and report to the governing body.** | **Shared** |
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| Operational and Strategic Management | Co-ordinate the operational, management and strategic direction of the firm and communicate this clearly to staff. | No |
| Compliance | Ensure compliance with all legal & regulatory requirements within the firm including GDPR.  Ensure all staff are aware of, understand and adhere to the firm’s policies & procedures manual which has been designed around regulatory requirements, treating customers fairly, contract certainty and the FCA Principles for Business  Complete the annual attestation confirming the firm’s pricing models comply with the pricing remedy. | No |
| Data Protection | Ensure compliance with all legal & regulatory requirements within the firm.  Ensure all staff are aware of, understand and adhere to the firm’s data protection policies & procedures which have been designed around regulatory requirements of the Data Protection Act 2018 | No |
| Consumer Duty | Oversight of and responsibility for the firm’s compliance with the regulatory requirements of the Consumer Duty  [eventually this will form part of the compliance requirements but whilst new it has been separated out] | No |
| HR | * Ensure staff are acting with integrity and are fit and proper to undertake their role. * Training and development including the Continual Professional Development of all Senior Managers and staff as required * Recruitment * Setting performance benchmarks for all staff / undertake the Performance Review Process * Appraisals and regular one-to-one meetings | No |
| Complaints | * Ensure all staff are aware of and adhere to the firm’s complaints procedures. * Provide training on recognising and dealing with a complaint at regular intervals * Review complaints MI * Submit complaints data to the FCA | No |
| Sales and Marketing | * Responsible for all sales and marketing strategies associated with the firm. * Responsible for signing off marketing in accordance with FCA and other applicable regulations. | No |
| Treating Customers Fairly (TCF) | * Ensuring that the firm can consistently show that the fair treatment of customers is at the heart of the firm’s business model. | No |
| Appointed Representatives (Including Introducers and Introducer ARs) |  |  |

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| **Title for this local responsibility** | **Details of Local Responsibility**  **(SYSC 26) local responsibility for an activity, business area or management function at branch level. If no branch this section is not applicable.** | **Shared** |
|  | Single branch firm so not applicable |  |

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| **Title for other responsibilities** | **Other Responsibilities** | **Shared** |
| Internal communications | * Demonstrate, encourage and communicate clearly to all staff the firm’s culture and values. * Hold regular meetings to ensure staff are kept informed. * Ensure meetings are minuted. |  |
| Public Relations | Networking and communication through a variety of media |  |
| Insurance Distribution | Responsible or Insurance Mediation / Insurance Distribution and ensuring the proper implementation and regular review of policies and procedures / systems and controls as appropriate to the business. |  |

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| **Ref** | **Any other Details if relevant to the above** |
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| **Supplementary Information:-** |
| * [XXXX] is Managing Director and ultimately responsible for all aspects of the firm’s activities * [XXXX] is the most senior officer within the firm and reports to the Board on all necessary matters * [XXXX] is the majority Shareholder * [XXXX] is personally responsible for all decisions made on strategic and day to day matters.   **Key Committees** |

**Signed by Role Holder and on behalf of the Governing Body**

**Name\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Name\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**