**Appointed Representative (AR) Monitoring Record**

**Name of Appointed Representative:**

Due diligence completed by:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Senior manager with overall responsibility for Compliance within the firm:

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| --- | --- | --- |
| **Appointed Representative** | Has there been a change to the name of the Appointed Representative? | YesNo |
| Has there been a change of trading address? | YesNo |
| Has there been a change of registered office address? | YesNo |
| Has there been any changes to the nature of the AR’s business: -  Guidance note: Use publicly available information as well as information from the firm itself: google search, website, companies house, social media.  Guidance note: Non regulated activities could affect the ability of a principal to effectively oversee an AR. Understanding the AR’s business will help identify potential sources of risk and harm to consumers. | YesNo |
| Have there been any changes to the directors?  If yes, please provide details and ensure fit and proper declarations are completed. | YesNo |
| Have there been any changes to the shareholders with 20% or greater shareholding?  If yes, please provide details and ensure fit and proper declarations are completed. | YesNo |
| Have there been any changes to the primary reason for dealing with the AR: -  If yes, please provide full details and an explanation. | YesNo |
| Has there been a change of the parent undertaking if the AR is part of a group.  If yes, please provide full details. | YesNo |
| Has there been any change to the regulated activities the AR will be undertaking on behalf of the firm.  If yes, was the FCA notified at least 10 days prior to the change taking place? | YesNo  YesNoN/A |
| Is the AR currently working with another Principal?  If yes, the firm is required to enter into a multi principal agreement with a lead principal identified (template document available). | YesNoN/A |
| Has the agreement with the other principal been terminated in the last 12 months?  If yes, have you document the reason the relationship was terminated. | YesNoN/A  YesNoN/A |
| Has the financial due diligence form/fitness and propriety declaration been revisited? | YesNo |
| Has there been any change to the clients the AR will be dealing with?  Guidance note: The definition of retail client includes all clients other than professional clients such as large corporate entities and government bodies and eligible counterparties. In most cases small and medium sized enterprises (SMEs) will fall into this category. | YesNo |
| Have the FCA been advised of any changes to the information held on the AR within the appropriate time scales?   * 10 days before the change to regulated activities takes place. * Within 10 business days in respect of changes to the information originally provided on the Appointed Representative. | YesNo  YesNo |
| Has the firm checked and confirmed the details held on the Financial Services Register about the Appointed Representative within 60 days of the firm’s ARD | YesNo |

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| **Bank Details** | Has there been a change to the Bank Details of the Appointed Representative? If yes, | YesNo |
| * Has a bank statement been provided? | YesNo |
| * Were details of the change provided on letter headed paper? | YesNo |
| * Has a cheque been provided? | YesNo |
| Comments | |

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| **Payment Details** | Have there / will there be any changes to:-   * Whether the AR pay the principal for services received? * On what basis will the Appointed Representative be paid? * In what currency will the payments be made? * Is the client aware of the payments? * Whether the payments have a negative impact on the value of the products distributed through the AR? | YesNo |

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| **Revenue** | Revenue in the last 12 months: - |  |
| Regulated Activity | £ |
| Non Regulated Activity (financial in nature) | £ |
| Non Regulated Activity (non-financial in nature) | £ |
| Total | £ |
| Forecasted Revenue for the next 12 months: |  |
| Regulated Activity | £ |
| Non Regulated Activity (financial in nature) | £ |
| Non Regulated Activity (non-financial in nature) | £ |
| Total | £ |
| Comments | |

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| **Oversight** | Has the firm identified any reason why they are unable to adequately oversee the AR: -   * Size of firm and number of staff * Breadth of activities – regulated and non-regulated * Number of complaints in the last 12 months linked to the AR * Lack of MI * Inability to meet with the AR on a regular basis * Has there been a significant increase in the business activity either at the Appointed Representative or the principal firm meaning time pressures make meaning full oversight difficult? | YesNo |
| Have regular documented meetings been conducted with the AR in the last 12 months. | YesNo |
| Has the following MI been provided in the last 12 months?   * Complaints * Revenue * File audits * Meetings * Training logs * Breaches | YesNo  YesNo  YesNo  YesNo  YesNo  YesNo |
| Due diligence review date set: | DD/MM/YYYY |

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| **Competency** | Has competency been assessed in the last 12 months? | YesNo |
| Has training been undertaken? | YesNo |
| Are training logs up to date and have they been evidenced? | YesNo |
| Comments | |

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| **Fitness and Propriety** | Has the annual fitness and propriety declaration been signed on behalf of the AR? | YesNo |
| Have senior management signed the annual fitness and propriety declaration? | YesNo |

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| **Criminal Records** | Has the firm felt it necessary to undertake a Criminal Records Check on the approved persons at the Appointed Representative? | YesNo |

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| **Credit Records** | Has the firm felt it necessary to undertake a credit check on the approved persons at the AR firm. | YesNo |
| Comments | |

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| --- | --- | --- |
| **Complaints** | Have any complaints been received about the Appointed Representative in the last 12 months and has root cause analysis been carried out. | YesNo |
| Has training on recognising and dealing with complaints been provided to the AR | YesNo |
| Comments | |

Due diligence appraised and passed by:

Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_[Print]

(Senior manager responsible for anti bribery and corruption within the firm)

Guidance note: Prescribed Responsibility (d) – responsible for countering the risk that the firm might be used to further financial crime

Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_