

Time Waits for No Man

Since the introduction of the Senior Managers & Certification Regime (SM&CR), SM&CR has significantly raised the bar for standards of personal conduct and put a more rigorous emphasis on management accountability. A large number of HR processes and procedures have had to be updated as a result of the new standards.

It is important to remember that the Senior Managers & Certification Regime has an impact at all levels across a business.

What is the new scheme?

The regime gives senior managers a new responsibility. It requires firms to identify individuals in the next tier down of management and those performing certain specific roles (or in old terms, accreditation functions). What some firms forget is that they have an obligation to review and certify individuals each year. The review should assess the person's fitness for the role(s) they perform.

The scheme sees the introduction of criminal record checks for both senior managers and non-executive directors, as well as a new template which firms must use to provide regulatory references for senior managers and staff (in certificated role).

The new regime has brought in a specific set of conduct rules that apply to all staff (excluding support function roles). There is now a requirement to ensure training on how the new conduct rules apply to their roles. Breaches of the rules and regime may result in disciplinary action and a formal report submitted to the regulator. So, it is important!

What you need to do to comply?

The next deadline falls on 31 March 2021 (postponed from 9 December 2020). Between now and then, you need to collect evidence to demonstrate that certified staff are suitable to carry out their roles so you can issue their certificate.

All other staff impacted by the conduct rules must have been trained in the rules as they apply to their roles.

You need to have uploaded information on Directory Persons to the new FCA Directory via Connect before the deadline.

There's a lot involved in making sure you comply with the new regime and you are ready for the next Senior Managers & Certification Regime deadline.

Here at IHR Solutions, we are working with clients to update all the necessary policies and procedures and contracts of employment and service agreements, to ensure full compliance with the regime. From inserting new clauses to checking all the necessary evidence is collated in a presentable manner.

For further information and assistance, contact me at kwatkins@ihrsolutions.co.uk or call me direct on 07566 766954 or call our helpline on 01604 709509.

About the Author

KATHERINE WATKINS

Katherine has over 20 years' international experience working in HR, across various sectors, including financial services, insurance and regulated environments. Over the years, she has collaborated with some exceptionally talented HR professionals, with whom she has joined forces on special projects. Her network of HR professionals provides advice and training to companies and other HR teams.

In her role with UKGI Group, Katherine heads up the Human Resources Consultancy and provides objective support to firms on employment law and HR issues. She uses her extensive skills and knowledge to work with firms to help them develop strong and resilient HR strategies and establish healthy organisational cultures.

Katherine holds a degree in Business Administration and Management from the University of Northampton and a Postgraduate Diploma in Human Resource Strategies from London Metropolitan University. She is a Fellow of the Chartered Institute of Personnel and Development (FCIPD).

