

Extension of Senior Managers and Certification Regime for Insurers

Designing a Project Plan: Sample Project Plan



Determine whether your firm should be regarded as a large firm

Firms will need to assess whether they fall within the quantitative thresholds of this test, as this will impact on the precise rules applicable to them



Mapping responsibilities

Step 1: Identifying Senior Manager Function holders

Existing Senior Insurance Management Functions will convert into Senior Management Functions ("SMFs"). New SMFs will be introduced and firms must consider whether any persons will be undertaking these soles.

Step 2: Checking existing allocations against new rules and guidance

New rules and guidance on allocating certain SMFs will be introduced. Allocating prescribed responsibilities

As part of the SMCR there are new prescribed responsibilities which must be allocated amongst SMFs.

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Updating documentation responsibilities map and statements of responsibilities

It will be necessary to update the firm's SIMR-related documents (currently, the governance map and scope of responsibility documents) to reflect new SMFs and prescribed responsibilities, and updated rules and guidance It will also be necessary to create any new policies required as par of SMCR.



Conduct rules changes

As a wider range of persons will become subject to conduct rules as a result of SMCR, firms may need to update employment documentation and policies or provide training to staff



Preparing for the introduction of the new Duty of Responsibility

This may include providing training to SMF holders and updating employment documents.



Implementation of certification regime

Consider existing

Step 1: Identifying relevant certification function holders

It will be necessary to identify people who are performing certification function as they will be subject to the certification regime.

Step 2: Update processes to reflect the certification regime

Persons performing certification functions will be subject to various requirements, including that firms will need to certify that such persons are fi and proper on an annual basis.





Updating HR processes: fit and proper tests and disciplinary notifications

SMCR will introduce some changes in respect of fit and proper processes, and these will need to be reflected in an insurer's processes. There are also new rules on notifying conduct rule breaches by individuals to the regulator.



Preparing regulatory submissions and applications

These include new applications for approval for new SMFs, and notifications for ECA controlled functions which are converting into SMFs.



Implement delayed SMCR requirements

Certain requirements will only come into effect in December 2019.



Commencement date for SMCR extension: 10 December 2018.

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