Form can be split for individual SMs if more than 1

Competency indicators and evidence are firm specific

These can be shared with other senior managers

These are possible competency indicators

This is evidence of competency based on competency indicators

James Bond - SM Competency Review 202X

**SMCR – SM Function Map and Competence**

| **Role of Responsible Person** | **Explanation** | **Senior Manager Function (SMF, PR, OR)** | **Shared?**  **If so, who with?** | **Competence based on** | **Competence evidence** | **Competence demonstrated**  **(Yes / No) and why** |
| --- | --- | --- | --- | --- | --- | --- |
| Executive (Director) | General Corporate Governance | SMF3 |  | * Competence as adviser * Maintaining sufficient bank funds for regulatory purposes * Controlling suppliers * Having quarterly management accounts * Staff competency | * Project management * Bank statements * Significant outsourcing register * Management Accounts * Staff appraisals | For example “Yes, evidence seen and available if needed.” |
| Compliance Oversight | Responsibility for the compliance function in the firm and reporting to the governing body on this. | SMF16 |  | * Delivery of an annual regulatory risk assessment * Implementation of adequate procedures * Implementation of adequate controls * Effective management of breaches * Recruitment of management information, its assessment * Completion of FCA notifications | * Sight of procedures * Routine and annual Compliance reports to the board * GABRIEL returns submitted on time * Completion of annual compliance plan |  |
| Anti-Money Laundering Oversight | Responsibility for overseeing the firm’s  compliance with the FCA’s rules on systems and controls against money laundering. | SMF17 |  | Assessment of the firm’s ML risk and the controls in place to deal with them | AML risk assessment checklist. |  |
| SMF oversight | Responsibility for the firm’s performance of its obligations under the senior managers regime | SMF PR a) |  | * Understanding of SMR requirements * Responsibilities mapping * Allocation of responsibilities * Oversight of SMF functions | * CPD * Implementation of the responsibilities map * Drafting of SoRs * Conduct rules training |  |
| Certification oversight | Performance of the firm of its obligations under the certification regime | SMF PR b) |  | * Up to date T&C plan * Carrying out of supervision duties * FIT assessments | * T&C plan * Conduct rules training * 121s * FIT certificates |  |
| FCA Notifications | Responsibility for reporting to the FCA | SMF PR b-1) |  | FCA reporting as required | * Timely GABRIEL reporting * Submission of FCA questionnaires and surveys |  |
| Prevention of Financial crime, bribery and corruption | Responsibility for the firm’s policies and procedures for countering the risk that the firm might be used to further financial crime | SMF-PR d). |  | * As for previous line * Implementation of anti-bribery procedures * Training of staff | * AML risk assessment checklist * Evidence of staff training * Anti-bribery procedures are up to date |  |
| Information technology | This refers, for example, to a firm’s use of computers and other electronic equipment to store and send information. | SMF- SMF-OR |  | Identification of key suppliers and the risk to the business of them failing | * Significant outsourcing list * Regular due diligence on suppliers |  |
| Outsourcing | Oversight of any external outsourcing such as management accounts, compliance, IT and platforms used | SMF-OR |  | Identification of significant suppliers | * Up to date significant outsourcing register * Assessment of delivery |  |
| Data protection | Responsibility for ensuring all electronic data remains secure, that staff are appropriately trained and monitored and that breaches are appropriately identified, dealt with and reported | SMF-OR |  | * DP procedures * Staff training * DP monitoring * DP reporting | * Up to date procedures * Training log complete and up to date showing delivery of relevant training * Evidence of systems testing * Evidence of reporting to ICO |  |
| Human Resources | To manage staff in an appropriate manner | SMF-OR |  | * Job competency * Job training * Contracts * Recruitment and exits | * Staff appraisals * Staff contracts * Conduct rules training * Staff HR files |  |
| Finance | Oversight of the firms income and expenditure in line with regulatory requirements. Capital adequacy. | SMF-OR |  | * Statutory accounts * Bank statements | * RegData application |  |
| Consumer Duty | Reading of FCA guidelines and PS, preparing and maintaining CD action/monitoring plan | SMF-OR |  | * CPD record * Action/monitoring plan | * CPD record * Action/monitoring plan |  |
| Retirement income sustainability | Responsibility for retirement income sustainability control | SMF-OR |  | * Retirement income sustainability control | * Retirement income sustainability control |  |

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**Assessment made by James Bond (**SMF3 and SMF16) **on behalf of the Skyfall Financial Planning Ltd**

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**Dated**