

#### Core Details

10.00am — 12.00pm City of London



2 CPD Hours

#### To Book

Call
0203 178 4230
Email
stuart.bull@fstp.co.uk
Online
fstp.co.uk

#### Your Consultant

#### Lorraine Mousley

Lorraine brings over 30 years of experience in the retail banking and financial advice sector, having worked predominantly in the Banking, Bancassurance and Independent Financial advice sector. Lorraine has extensive experience in all aspects of retail financial services, and a highly successful track record as a Financial Adviser, Area Manager and Training Design and Delivery Consultant. This gives her strong customer focus, employee engagement, and business awareness of retail clients and the issues they face.

As a Chartered Financial Planner, Lorraine was also one of the first two people in the country to have fully completed the CII Regulated Diploma. Lorraine has extensive training experience at Regulated Diploma level, across all subjects, and is an Accredited CII Trainer.

## Reasonable Steps

### Proving they have been taken

The term Reasonable Steps is used in the first 3 SMF Conduct Rules:

- 1. You must take **reasonable steps** to ensure that the business of the firm for which you are responsible is controlled effectively.
- You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with relevant requirements and standards of the regulatory system.
- 3. You must take **reasonable steps** to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegate's responsibility effectively.

But what does the term 'reasonable steps' imply?

The Culpability Standard

The regulator has stated that "A person will only be in breach of any of the rules in COCON where they are personally culpable. Personal culpability arises where:

- A person's conduct was deliberate; or
- The person's standard of conduct was below that which would be **reasonable** in all circumstances".

This 2 hour workshop aims to unravel the confusion that lies around this terminology and shed light on the regulators expectations.

#### **Benefits**

By attending this workshop you will be able to:

- Gain awareness of the type of evidence the regulator expects to see
- See examples of reasonable steps aligned to Prescribed and Other responsibilities
- Understand when the requirement to take "extra notes" might arise
- Understand the need for evidence post leaving a senior management function role



#### Cost

#### £295 / person + VAT £354

A discount of 10% per person is available when booking for 2 or more delegates on the same course in a single booking.

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Call 0203 178 4230 Email stuart.bull@fstp.co.uk Online fstp.co.uk

#### In-house Course?

This course works well as an in-house event, contact us to discuss your needs on 0203 178 4230 or email info@fstp.co.uk





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# Reasonable Steps

#### <u>Agenda</u>

| Session                 | Learning Outcomes   |
|-------------------------|---|
| Regulatory requirements | <ul> <li>Clarify The Conduct Rules – A recap</li> <li>Understand the relationship between Prescribed responsibilities, Statements of responsibility and Reasonable steps</li> </ul> |
| Proof                   | <ul> <li>Appreciate examples of reasonable steps documentation</li> <li>Establish what counts as evidence</li> </ul>  |
| Access                  | Confirm when, what and how<br>you may need access to evidence<br>once you have vacated the role   |