

## Chapter 2

# Financial crime systems and controls

## 2.3 Further guidance

- 2.3.1** **G** *FCTR* contains the following additional guidance on **governance**:
- **FCTR 6.3.1G** (Governance), from the *FSA's* thematic review Data security in Financial Services
  - **FCTR 8.3.1G** (Senior management responsibility) from the *FSA's* thematic review Financial services firms' approach to UK financial sanctions
  - **FCTR 9.3.1G** (Governance and management information) from the *FSA's* thematic review Anti-bribery and corruption in commercial insurance broking
  - **FCTR 11.3.1G** (Governance, culture and information sharing) from the *FSA's* thematic review Mortgage fraud against lenders

- 2.3.2** **G** *FCTR* contains the following additional guidance on **risk assessment**:
- **FCTR 8.3.2G** (Risk assessment) from the *FSA's* thematic review Financial services firms' approach to UK financial sanctions
  - **FCTR 9.3.2G** (Risk assessment and responses to significant bribery and corruption events) from the *FSA's* thematic review Anti-bribery and corruption in commercial insurance broking
  - **FCTR 10.3.7G** (Responsibilities and risk assessments) from the *FSA's* thematic review The Small Firms Financial Crime Review
  - **FCTR 12.3.3G** (High risk customers and PEPs – Risk assessment) and (Correspondent banking – Risk assessment of respondent banks) from the *FSA's* thematic review Banks' management of high money laundering risk situations

- 2.3.3** **G** *FCTR* contains the following additional guidance on **policies and procedures**:
- **FCTR 8.3.3G** (Policies and procedures) from the *FSA's* thematic review Financial services firms' approach to UK financial sanctions
  - **FCTR 10.3.1G** (Regulatory/Legal obligations) from the *FSA's* thematic review The Small Firms Financial Crime Review

- 2.3.4 **G** *FCTR* contains the following additional guidance on **staff recruitment, vetting, training and awareness**:

  - ■ **FCTR 12.3.2G** (High risk customers and PEPs – AML policies and procedures) from the *FSA's* thematic review Banks' management of high money laundering risk situations
  - ■ **FCTR 6.3.2G** (Training and awareness) and ■ **FCTR 6.3.3G** (Staff recruitment and vetting) from the *FSA's* thematic review Data security in Financial Services
  - ■ **FCTR 8.3.4G** (Staff training and awareness) from the *FSA's* thematic review Financial services firms' approach to UK financial sanctions
  - ■ **FCTR 9.3.5G** (Staff recruitment and vetting) and ■ **FCTR 9.3.6G** (Training and awareness) from the *FSA's* thematic review Anti-bribery and corruption in commercial insurance broking
  - ■ **FCTR 10.3.6G** (Training) from the *FSA's* thematic review The Small Firms Financial Crime Review
  - ■ **FCTR 11.3.6G** (Staff recruitment and vetting) and ■ **FCTR 11.3.8G** (Staff training and awareness) from the *FSA's* thematic review Mortgage fraud against lenders laundering risk situations
  
- 2.3.5 **G** *FCTR* contains the following additional guidance on **quality of oversight**:

  - ■ **FCTR 6.3.15G** (Internal audit and compliance monitoring) from the *FSA's* thematic review Data security in Financial Services
  - ■ **FCTR 9.3.9G** (The role of compliance and internal audit) from the *FSA's* thematic review Anti-bribery and corruption in commercial insurance broking
  - ■ **FCTR 11.3.5G** (Compliance and internal audit) from the *FSA's* thematic review Mortgage fraud against lenders
  
- 2.3.6 **G** For firms' obligations in relation to whistleblowers see the Public Interest Disclosure Act 1998: [www.legislation.gov.uk/ukpga/1998/23/contents](http://www.legislation.gov.uk/ukpga/1998/23/contents)