

Senior arrangements, Systems and Controls

Chapter 18

Whistleblowing

18.4 The whistleblowers' champion

- 18.4.1** **G** (1) A UK SMCR banking firm is required under ■ SYSC 24.2.1R to allocate the FCA-prescribed senior management responsibility for acting as the firm's whistleblowers' champion.
- (2) ■ SYSC 18.4.2R requires the appointment by an insurer of a director or senior manager as its whistleblowers' champion.
- (3) This section sets out the role of the whistleblowers' champion.
- (4) The FCA expects that a firm will appoint a non-executive director as its whistleblowers' champion. A firm that does not have a non-executive director would not be expected to appoint one just for this purpose.
- 18.4.2** **R** An insurer must appoint a director or senior manager as its whistleblowers' champion.
- 18.4.3** **R** A firm must assign the responsibilities set out in ■ SYSC 18.4.4R to its whistleblowers' champion.
- 18.4.4** **R** A firm must allocate to the whistleblowers' champion the responsibility for ensuring and overseeing the integrity, independence and effectiveness of the firm's policies and procedures on whistleblowing (see ■ SYSC 18.3 (Internal Arrangements)) including those policies and procedures intended to protect whistleblowers from being victimised because they have disclosed reportable concerns.
- 18.4.5** **G** The whistleblowers' champion:
- (1) should have a level of authority and independence within the firm and access to resources (including access to independent legal advice and training) and information sufficient to enable him to carry out that responsibility;
- (2) need not have a day-to-day operational role handling disclosures from whistleblowers; and
- (3) may be based anywhere provided he can perform his function effectively.

18.4.6

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The role of a *whistleblowers' champion*, before the introduction of his or her responsibilities under those provisions of ■ SYSC 18 which are to come into force on 7 September 2016, includes oversight of the *firm's* transition to its new arrangements for whistleblowing.