

Chapter 4

Further topics

4.2 Communications plan

- 4.2.1** **G** An effective wind-down plan would include a predetermined communications plan that considers the contents and timing of communications, including website updates (and possibly a hotline), to a wide range of stakeholders, such as relevant regulators (e.g. the listing authority, stock exchange, *FCA*, *overseas regulators* etc.), *employees*, *customers*, *service providers*, *shareholders*, bondholders, relevant industry associations and trade bodies and the media. Some suggested elements the *firm* may want to consider for the communications plan include:
- (1) identifying the stakeholders to be engaged;
 - (2) determining who should engage those stakeholders;
 - (3) agreeing the internal process for drafting and approving any communication to the stakeholders;
 - (4) establishing guidance and procedures for a proactive vs a reactive communication strategy (or combination);
 - (5) preparing scripts in advance if appropriate, e.g. holding statements, acknowledging that detailed messaging may only be possible reactively; and
 - (6) recognising the potential need for the *governing body* to engage with legal advisors and communication experts (e.g. through media training).
- 4.2.2** **G** Good stakeholder contact during the wind-down period will support the *FCA's consumer protection and market integrity statutory objectives*. Communications should be carefully handled to avoid a lack of reliable information or leaks which could create concerns among *consumers* and, in more severe cases, an increased risk of detriment and disruption to the wider market.
- 4.2.3** **G** In line with Principle 11 (■ PRIN 2.1.1R), *firms* need to be mindful of their obligation to keep the *FCA* informed of material developments. This includes issues that might threaten the ongoing viability of the *firm* and any decision(s) to cease operations. Thereafter, a regular dialogue between the *firm* and the regulator needs to be maintained.
- 4.2.4** **G** It is important for the *firm* to identify one or more individuals who will be responsible for coordinating effective and timely communications during the

wind-down period. These individuals are likely to include senior decision-makers as well as those with specialist communications/technology skills, for example those with knowledge of financial disclosure requirements, web publishers etc. This is particularly relevant for a *group* of companies, or where *listed* entities are involved. In order for these individuals to effectively deliver communications in a wind-down they will need the appropriate training, tools, systems and resources.