

## 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

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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

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*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

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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)