Senior managers and certification regime: Management responsibilities maps and handover procedures and material

Chapter 25

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25.3 Management responsibilities maps: Exclusion of non-financial services activities for some firms

- 25.3.1 An enhanced scope SMCR firm may prepare its management responsibilities map so that (subject to ■ SYSC 25.3.2R) it only includes its management and governance arrangements to the extent that they cover, support or otherwise relate to its SMCR financial activities.
- 25.3.2 If a firm uses the exclusion in ■ SYSC 25.3.1R it must include sufficient information about the excluded management and governance arrangements to show how the included management and governance arrangements fit in with the firm's management and governance arrangements as a whole.
- 25.3.3 Support functions that should be covered by a management responsibilities map despite ■ SYSC 25.3.1R include:
 - (1) human resources;
 - (2) the firm's information technology; and
 - (3) compliance and legal services.
- G 25.3.4
- (1) A firm may have a non-financial services business in addition to carrying on its SMCR financial activities. Its support services may support both aspects of its business and its management responsibilities map may therefore still need to cover the support services even though they also cover the firm's non-financial services business.
- (2) Take for example human resources. If the firm's human resources function covers the firm's entire workforce without separating the parts that deal with the firm's financial services and its other business, the management responsibilities map should cover the entire human resources function.
- (3) On the other hand, the firm may separate the part of its human resources function that deals with those working in its financial services business from the part that deals with the other part of its business. In that case the management responsibilities map may leave out (subject to ■ SYSC 25.3.2R) the part of the human resources function that covers its non-financial services business.