

Consultation response template

## **Certification Regime: Supporting Guidance on establishing pass/fail criteria and evidencing the F&P assessment**

Please send all responses and queries to [certification@bankingstandardsboard.org.uk](mailto:certification@bankingstandardsboard.org.uk). The closing date for responses is close on **29 September 2017**.

Respondent name	
Organisation (if applicable)	
Contact email	

### **The approach to assessing F&P**

Question 1: Do you think the framework (set out on pages 5-6 of the draft guidance) is useful for understanding the steps involved in an F&P assessment, or are there amendments that would better describe industry good practice?

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### **The options available to firms following an F&P assessment**

Question 2: Are the four options set out on pages 9-13 of the draft guidance the right ones? Are there others that should be added, or should any of these four be amended or deleted?

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Question 3: Do you agree with the explanations and definitions of these different options?

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Question 4: How do these options reflect your current approach to or experience of F&P assessments? Are there any aspects which would be new to your firm? If so, which would be the most challenging?

#### **Use of illustrative examples**

Question 5: Are the illustrative examples in the draft guidance useful and appropriate? Are there others that would provide additional, better or more relevant examples of:

- a. the factors to consider when evaluating information that may call into question an individual's F&P;
- b. maintaining F&P;
- c. mitigating certification risks;
- d. remediating certification issues; or
- e. where remediation is not possible?

#### **The balance between individual and firm responsibilities**

Question 6: Is the guidance on the role of individuals in maintaining their F&P appropriate or are there other factors we should take into account?

Question 7: Is there anything in this guidance, either in substance or tone, which would result in inappropriate or unnecessary responsibilities being placed either on the firm or the individual?

#### **Links to regulatory references**

Do you have any comments or examples relating to the links between how the outcomes of F&P assessments are recorded and regulatory references?

#### **Any other comments**

Do you have any other comments you wish to add?