



KPMG CASS Health Check

July 2024



The FCA uses a variety of means to obtain more information about regulated firms. Short notice visits, direct supervision and in some cases section 166 reviews are examples of the ways in which the FCA can gather thematic insights on the industry.

The FCA's Client Assets and Resolution Department (CARD) are able to request a visit at any time to a regulated CASS firm.

The focus of these visits can vary from one solitary area to multiple areas of the firm's CASS activities and governance.



How ready is your firm for a visit from the FCA?

KPMG Health Check-Up

At KPMG we can help by simulating a short notice visit from the FCA. This can help firms to prepare for the unpredictable nature of a visit and may highlight potential recommendations for improvement.

We will send senior CASS SMEs for an onsite visit to conduct a number of Health Check interviews across some of the key CASS risk areas we have seen scrutinised by the FCA. The visit can also replicate the FCA's ability to call on any individual from within the firm.

A check-up can provide useful insights for those personally accountable for CASS over the firm's readiness for an external visit, especially if a visit from the FCA is expected in the near future.

Why KPMG?



Extensive CASS expertise and market insight



An expert team that understands your business



Flexible and proactive approach



Insolvency experience



Close working relationship with the FCA



Key considerations

To get the most out of your CASS Health Check we will agree a high level interview agenda with you which could include (but is not limited to) the following:

- **Governance and Accountability**
 - Can individuals explain who is accountable for CASS within the organisation and how compliance with the requirements is monitored?
- **Culture & Stakeholders**
 - Can individuals explain CASS procedures, processes and controls?
 - Are technical interpretations documented and understood by operational staff?
- **CASS Resolution Pack**
 - Can individuals answer questions about the contents of the resolution pack?
 - Do they know their responsibilities in the event of a test/insolvency?
- **Breaches**
 - Can individuals explain how CASS breaches are captured, investigated, escalated and remediated?
- **CASS Management Information**
 - Does the current suite of MI evaluate and quantify CASS risk?
 - Does this information feed into appropriate governance channels?
- **CMAR & Policy Review**
 - Can individuals answer questions about the processes and controls in place to support the CMAR production and submission?

How will this visit benefit you?

01 We will provide you with a summary report which includes:

Details of our scoping rationale to identify interview areas based on risk, including how we evaluated any unusual CASS treatments, recent FCA hot topics, common industry audit issues and other themes identified by us or by you.

Thematic comments on the outcomes of the interviews, as well as the timeliness of any document requests.

02 You will have access to our CASS SMEs during a debrief session who can offer insights as to what you can expect during an FCA visit. They have extensive experience in preparing Senior Managers for FCA interviews, delivering section 166 reviews on the FCA's behalf and advising firms undergoing direct FCA supervision and enforcement action.

03 An independent third party will review your approach to receiving the FCA, which can be benchmarked against your peers. This can help you to better prepare critical CASS individuals and activities.

Contact us



Hanish Arora
Director | FS Consulting
T: +44 (0)20 7694 2366
E: hanish.arora@kpmg.co.uk



Rhoda Ejiga
Director | FS Consulting
T: +44 (0)20 7694 3279
E: rhoda.ejiga@kpmg.co.uk

kpmg.com/uk



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