



CASS RP Review

July 2024



01 The CASS Resolution Pack (“CASS RP”) is intended to help return client money and safe custody assets to clients in a timely manner in the event of insolvency.

02 In 2017, the FCA undertook 115 CASS reviews, which included on-site visits and desktop assessments of resolution packs.

03 A number of no-notice and short-notice visits have been recently conducted by the FCA.

04 Firms need to ensure documentation is retrievable as soon as possible, and in any event within 48 hours.

05 You need to be ready to have your CASS RP tested at any time.



The CASS RP is often the starting point for the FCA to see how seriously firms take CASS compliance and whether they properly understand their obligations.

KPMG will benchmark your CASS RP, along with your supporting processes and controls, against your peers by leveraging our panel of CASS subject matter experts who have real life experience of insolvencies involving the return of Client Assets.



Our approach

We set out below key elements of our approach.

This will provide a robust assessment of your CASS RP and benchmark you to your peer group.

Insolvency practitioner workshops

KPMG will provide a overview of the insolvency process, relevant legislation and practical applications based on recent insolvencies such as MF Global, Alpari and Worldspreads.

Document review

Assessment of your RP documentation to determine whether it meets the CASS 10 requirements, our understanding of the FCA's expectations and industry practice.

CASS RP test

This phase (a 'mock IP simulation') will consist of sample testing of agreed categories of CASS RP documentation to assess whether documents can be retrieved within the immediate or 48 hour timeframes.

Controls assessment

Review of the design of key controls and governance arrangements to support a compliant CASS RP (e.g. what controls are in place to ensure changes are captured in a timely manner?).

Reporting

Our observations from the review stages will be shared with you in a detailed written exceptions based report setting out our review procedures, observations and recommendations.

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

Contacts

For further information please contact the advisors below.



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