

Conduct Rules Scenarios

The Unexpected Absence

Scenario

You are a Senior Manager with Quality Advice Ltd, a firm of independent financial advisors. Quality Advice Ltd is a core firm for SM&CR purposes.

The FCA is due to visit next month. Jane Doe, the Senior Manager with responsibility for the area of the business on which the FCA visit will focus is unexpectedly signed off on sick leave. You are asked to step in and continue preparations for the visit.

Unfortunately, Jane Doe has not left any kind of handover note. You have no expertise in this area. To make matters worse, you do not have any spare time to bring yourself up to speed with the preparations undertaken to date.

Jane Doe had a small team assisting her with preparations for the FCA visit. You decide to trust that the team is on top of the situation.

The FCA visit does not go well. The FCA finds that the area of the business for which Jane Doe has responsibility is poorly organised and lacks the controls necessary for a firm of the type and size of Quality Advice Ltd.

What conduct rules may have been breached?

How should the firm respond?

What controls could have been implemented?