

# CASS Compliance Health-Check

A self-assessment across the governance, risk and operational areas firms most often need to address for CASS compliance. Work through each prompt and note where attention may be needed. This is guidance only — the topics are not in order of importance and this is not an exhaustive list of all the considerations firms need to comply with CASS requirements.

## Governance and Accountability

- Who is accountable for CASS compliance within the organisation, and how is compliance with the requirement to have adequate governance arrangements monitored?

## Culture & Stakeholders

- Can individuals explain CASS procedures, processes, and controls?
- Are technical interpretations documented and understood by operational staff?

## Risk Management

- Is there a process in place to continuously assess and mitigate risks associated with CASS operations?

## Governance Committees

- Does the firm have a CASS committee responsible for ensuring accountability on CASS compliance, and do the individuals on this committee have the appropriate skill and knowledge required?

## CASS Management Information

- Does the current suite of MI evaluate and quantify CASS risk?
- Does this information feed into appropriate governance channels?

## Three Lines of Defence

- What is the role of the three lines of defence within the firm? For example, does the firm have an internal audit function, and does this function perform any CASS reviews?

## Policy and Procedure Updates

- Are CASS-related policies and procedures in place covering processes such as reconciliations, due diligence, CMAR, CASS RP and breach reporting? If in place, are these kept up to date (what is the frequency of review) and in line with current processes?

## Risks and Controls Mapping

- Does the firm have risks-and-controls mapping documentation, and is this kept up to date?

## Staff Training

- Is periodic training conducted for staff to keep them aware of the CASS requirements and the impact on their responsibilities? Is this only for individuals performing CASS-impacting functions?

## Breaches

- Does the firm have a CASS breaches and escalation process?

## Information Technology

- Does the firm have adequate books and records for client assets held?
- What are the controls around IT governance?

## 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 or insolvency?

### HOW FIDE HELPS

Our advisory team runs full CASS health-checks — scoping, gap analysis, documentation and on-call support — and our expert-led training brings your team up to standard.