## Supervision in a challenging macro environment

What you said	What we are already / propose doing	Timing	Desired outcome
MoneyVal – uncertainty as to what this will mean for industry ~ There is a need to harmonise AML/CFT legislation	Complete the work on the Code, handbook and industry specific guidance	H1 2019	Through outreach scheduled through Nov/Dec and the 2019 planned Code consultation industry will have certainty
Increased scrutiny of offshore centres	Continue to work with Cabinet Office and other government agencies to address external threats to the Island's proposition in a manner that ensures that the economy is protected (OECD, EU Substance, MoneyVal) ~ Enhance the engagement of the Authority in International forums such as IAIS, Basel, IOSCO, GIFCS, GIICS, and MoneyVal to enhance knowledge and understanding of the Island and its economy and to erode negative perceptions	Ongoing	Tackle negative perceptions of the Island from within international supra-organisations resulting in improved relationships
A better understanding of the operating environment and commercial interface would make supervisory activities more effective.	Enhance the engagement of the Authority in International forums such as IAIS, Basel, IOSCO, GIFCS, GIICS and MoneyVal to obtain the global view of the pressures and developing issues impacting industry ~ Leverage our interaction with firms through Annual Business Meetings and other outreach opportunities to understand better the commercial environment to build a picture of the challenges facing industry at a macro level	Ongoing Proposal	Authority staff are up to date with issues affecting industry and this understanding is reflected in the supervisory approach and regulatory developments

What you said	What we are already doing	Timing	Desired outcome
The Authority could be more effective in identifying risks and issues affecting firms and intervene earlier to prevent unacceptable risk	Introduction of a consistent risk assessment methodology ~	Complete	Our work plans will be risk focused and officers will be able to articulate the risks being addressed
~ The Authority could understand our business better	Development of CASCADE ~	Ongoing	~ Automated systems will enhance the efficiency and capacity of the Authority
	Review of supervisory approach consistent with the vision and values ~	Ongoing	~ Consistent approach and behaviours exhibited by staff of the Authority
	Publication of Supervisory approach	2019/20	~
			Firms understand the types and level of engagement they can expect from the Authority and the reasons for that engagement
Provide more support to all firms in understanding and meeting requirements	Thematics will become a more widely used supervisory tool with publication of good practices and where improvements are required	Ongoing	Firms understand Authority expectations
The Authority should move to an online system	Development of CASCADE	Ongoing	Improved efficiencies for both the Authority and firms in the submission of information to the Authority

## Approach of the Authority

## Application of proportionality and a principled approach

What you said	What we are already / propose doing	Timing	Desired outcome
There is a need to strike an appropriate balance between regulatory objectives and the burden of compliance (especially in the smaller firms)	Development and publication of FSA Strategic plan. ~	Complete	Our work plans will be risk focused and officers will be able to articulate the risks being addressed
	Introduction of a consistent risk assessment methodology ~	2019/20	~ All firms understand the level of engagement that they can expect from the Authority and the reasons for this.
	Publication of Supervisory approach ~	2019/20	
	Where possible consultations are scheduled to reduce the burden on firms ~	Ongoing	
	Prior liaison with industry bodies is the preferred approach when introducing changes to legislation ~	Ongoing	
	All consultations to include a section on application to smaller firms	Proposal	
Smaller firms are less likely to use their industry bodies to engage with the Authority ~	Introduction of a small firms forum or 'drop' in workshops	Proposal	All firms feel that they are able to interact with the Authority and receive guidance
Smaller firms are less engaged and would welcome more opportunities for informal interaction through which guidance can be sought			
Make it easier to find information ~	Develop a Social Media strategy ~	Proposal	Guidance is easy to find ~

What you said	What we are already / propose doing	Timing	Desired outcome
Target updates to the industry it relates	Review the mechanisms for updates to enable	Proposal	Firms are informed about information that
	targeted distributions		relates to them
	~		
	Address issues with RSS	Q1 2019	

## Remediation and enforcement

What you said	What we are already / propose doing	Timing	Desired outcome
Firms questioned whether the Authority focuses on the right things.	Development and publication of FSA Strategic plan. ~ Introduction of a consistent risk assessment methodology ~	Complete 2019/20	Our work plans will be risk focused and officers will be able to articulate the risks being addressed ~ All firms understand the level of engagement that they can expect from the Authority and the reasons for this.
	Publication of Supervisory approach	2019/20	the reasons for this.
Firms would like more feedback about remediation and enforcement actions and provide follow up analysis of important cases for industry to learn from	Thematics will become a more widely used supervisory tool with publication of good practices and where improvements are required ~	Ongoing	Firms understand Authority expectations
	Publication of actions taken by enforcement ~	Ongoing	
	Within the confines of protecting the rights of the individuals the Authority will, in its annual report each year, publish key learnings for industry arising from remediation and enforcement actions taken in the year.	Proposal	
Some firms requested ongoing updates on ongoing cases.	Publish high level enforcement guidance. How matters are referred to enforcement. Matters taken into account in determining whether to initiate an investigation. Also clarity on the need to keep ongoing enforcement matters confidential and realistic timescales of complex investigations.	Proposal	Firms understand what information the Authority is able to share and what information it is not