

Chapter 18

Whistleblowing

18.4 The whistleblowers' champion

- 18.4.1** **G** (1) A UK SMCR banking firm is required under ■ SYSC 24.2.1R to allocate the FCA-prescribed senior management responsibility for acting as the *firm's whistleblowers' champion*.
- (2) ■ SYSC 18.4.2R requires the appointment by an insurer of a *director or senior manager* as its *whistleblowers' champion*.
- (3) This section sets out the role of the *whistleblowers' champion*.
- (4) The FCA expects that a *firm* will appoint a *non-executive director* as its *whistleblowers' champion*. A *firm* that does not have a *non-executive director* would not be expected to appoint one just for this purpose.
- 18.4.2** **R** An insurer must appoint a *director or senior manager* as its *whistleblowers' champion*.
- 18.4.3** **R** A *firm* must assign the responsibilities set out in ■ SYSC 18.4.4R to its *whistleblowers' champion*.
- 18.4.4** **R** A *firm* must allocate to the *whistleblowers' champion* the responsibility for ensuring and overseeing the integrity, independence and effectiveness of the *firm's* policies and procedures on whistleblowing (see ■ SYSC 18.3 (Internal Arrangements)) including those policies and procedures intended to protect *whistleblowers* from being victimised because they have disclosed *reportable concerns*.
- 18.4.5** **G** The whistleblowers' champion:
- (1) should have a level of authority and independence within the *firm* and access to resources (including access to independent legal advice and training) and information sufficient to enable him to carry out that responsibility;
 - (2) need not have a day-to-day operational role handling disclosures from *whistleblowers*; and
 - (3) may be based anywhere provided he can perform his function effectively.

18.4.6

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The role of a *whistleblowers' champion*, before the introduction of his or her responsibilities under those provisions of ■ SYSC 18 which are to come into force on 7 September 2016, includes oversight of the *firm's* transition to its new arrangements for whistleblowing.