



FCA BCP Questions

Operations

1. Has the firm activated any part of its Business Continuity Plan (BCP) or taken other precautionary measures in order to ensure operational continuity? If so, what impact has this had on business operations? If not, what are the triggers for doing so? Please also add how long have you planned for your contingency arrangements to be sustained?
2. How is COVID-19 impacting the products/services that you offer to your customers (e.g. branch closure, reduced transactions, corporate customers unable to trade as normal etc)? Have you experienced any actual impacts to your services for example higher/lower payment volumes or incidents due to third parties or suppliers? If yes, please provide details and what actions are being taken to manage those impacts?
3. What additional measures has/is your firm putting in place to support affected customers (including, vulnerable customers) for example, how have you considered any implications for cash services and payments related activities?
4. What level of contact/queries/complaints have you received from customers to date concerning COVID-19 and, what communications have you put in place on COVID-19 in response to recent announcements?
5. Are you tracking incidents/absentee rates specifically related to COVID-19? If so, what is the MI showing?
6. Have you seen any evidence of increased scams targeting your customers or cyber-attacks on your business? Have you experienced any material operational/IT disruptions or incidents? Are any IT systems approaching full capacity? If yes, please provide details.
7. Has the firm identified any services/functions it will no longer be able to complete? Has the firm identified any critical services supported by third parties that might be particularly susceptible to impacts of coronavirus? (e.g. due to unavailability of staff, location, or 4th party dependency). If yes, what actions are being taken to manage those impacts? Please also provide details of the third party referenced.

Financial resilience

8. What analysis have you done regarding the potential revenue impact of further negative COVID-19 developments (e.g. because of a slowdown in trading activity, costs associated with continued business continuity arrangements being enforced, reducing client meetings, other relevant services)?

9. Please confirm whether the business prefunds transactions and if yes, what was the peak demand on cash in the last twelve months to support these transactions?
10. How much liquidity do you currently have and are there any liquidity arrangements your firm is considering/making? Is the firm holding additional liquidity outside of regular stressed scenarios? How has this assessment been made?
11. Have you needed to call on emergency lines of credit within the past 12 months?
12. What pinch points or areas of stress are you experiencing that may be specific to your business or more generally to your sector?
13. Have you stress-tested and are you comfortable that your business will function normally over this period? Please provide details of the stress-testing you have completed.
14. What are current funding conditions like? Are you taking any specific funding actions? (e.g. reducing liquidity in any markets or products, adjusting counterparty collateral requirements).
15. Please confirm the total value of customer funds you are currently holding in GDP.

Governance and controls

16. How are you managing the current risk environment? Have you changed your risk parameters/tightened your risk management process or controls?
17. What are the worst case scenarios that you have planned for? For example, impacts of potentially higher or lower payment volumes, staff shortage, particular urban or regional lock-downs, the 'last branch' in a large area etc.