

Customer protection and CASS oversight for the Advised Aviva platform

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Customer protection

The FCA sees protecting customer money and assets as fundamental to consumers' rights. As a result, it has rules governing how firms will behave when they take on the responsibility to protect a customer's money or assets. These rules are set out in the CASS (Client Asset Sourcebook) rules with their primary purpose being to ensure that, should a firm fail, a customer would not suffer any loss.

The CASS rules are a set of detailed requirements published within the FCA Handbook. The rules cover how firms such as Aviva are required to handle customers' money and assets through customer relationships, outsourcing arrangements, operations, IT systems and the policies and procedures they have in place.

Aviva's CASS oversight

Aviva's CASS team is led by Chris Golland, the Advised Aviva platform CF10a and Head of CASS. Prior to joining Aviva, Chris led a specialist team from Grant Thornton, one of the world's largest professional services firms, who were appointed by Senior Management in early 2015 to develop the firm's CASS capabilities. Following completion of this, Chris took up the opportunity to join Aviva to lead the enhanced Platform Oversight and CASS team and to replace the outgoing CF10a. The CF10a is an FCA regulated role held by a senior manager within a CASS firm to oversee the operational effectiveness of a firm's systems and controls designed to achieve CASS compliance.



Chris Golland
CF10a and Head of CASS

Chris has extensive CASS and financial services experience, having worked for 25 years for several of the world's leading financial services firms in both operational, risk and accounting roles. In addition to his technical consultancy role with Grant Thornton, he worked as Head of CASS for Standard Life's Wrap Platform for three years where he created an enhanced CASS and platform oversight model. During this period Chris also spent three years as Chair of the TISA CASS Technical Committee where he worked with the FCA and industry firms in order to achieve consistency and best practice during significant changes in the CASS regulatory landscape.

In his role as CF10a, Chris has developed a dedicated platform oversight team of 22 staff of technical CASS professionals and transactional oversight Analysts to oversee all aspects of the Advised Aviva Platform. The purpose of this level of oversight is to ensure all customer positions are protected at all times and all customer transactions are monitored and completed in a timely and accurate manner.

The level of oversight undertaken requires a thorough programme of daily monitoring checks. These include the reconciliation of over 200,000 customer cash positions and several million asset positions in order to ensure these are correctly recorded and ring-fenced at all times. This can provide assurance that customers' money and assets are protected appropriately and in accordance with the CASS rules.

Monitoring

In addition, the oversight team perform over 100,000 trade control checks, 11,000 price checks, a check on all rebates, distribution receipts and contract notes. These checks are performed daily in order to ensure trades placed are completed in a timely and accurate manner and to ensure that should any issues occur, these are identified and rectified in a timely manner.

Governance

In addition to the daily oversight programme, the enhanced oversight model includes reporting by the CF10a to the CASS Governance Committee, the Risk and Governance Committee, the Joint CASS Committee (with platform provider) and the Advised Platform Board. This level of engagement ensures senior management participate in all aspects of customer money and asset protection. This also ensures that where issues occur, or require senior support, these are supported at an early stage and are concluded promptly with customer money and asset protection at the heart of all decisions.

In addition to the above, the CF10a and the Advised Platform Board of Directors have regular ongoing communication with the FCA in order to provide the degree of assurance required that the firm continues to operate in a compliant manner.