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Policy and Risk Directorate
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Dear Sirs

Re: CP51 on the 'Fit and Proper Regime'

The CISI is pleased to submit its response to Consultation Paper 51.

The CISI is a global professional body, headquartered in London and with a significant Irish membership. We are pleased to have a staff member in Ireland, Deirdre Heffernan (Deirdre.heffernan@cisi.org), and also an active committee of volunteers who assist us in offering opportunities for Continuous Professional Development (CPD) to our members there. The CISI grew out of the qualifications department of the London and Dublin Stock Exchanges before these were separated. We inherited the Registered Representative qualification. Since then the CISI has developed examinations approved and mandated by a range of regulators not only in the UK but also in a number of other international jurisdictions. For example we have developed global examinations reflecting local jurisdictions combined with global technical papers; the Irish Stock Exchange 'Regulatory Environment' paper is approved as part of our global model. Recently the CISI applied to become an Accredited Body in the UK with responsibility to issue formal Statements of Professional Standing (practicing certificates) with responsibility to check its members' CPD on behalf of the FSA under the Retail Distribution Review. The three key objectives of the CISI are to help financial professionals attain competence; help them to maintain it and to establish investors' trust. All of these chime well with the Central Bank's review of the "fit and proper" criteria.

We welcome the proposals on professionalism in CP51, particularly the focus on training in risk, corporate governance and ethics for holders of Controlled Functions. Numerous international studies of the financial crisis (such as the Turner Review) have found that all three of these were significant contributors to it. We decided to survey our members in Ireland on these issues and although the sample was small (21) the overwhelming majority of our Irish members we surveyed thought not only that training in risk, corporate governance and ethics was important, but also that the regulator should have a list of recommended qualifications and trainers in these areas.

As a professional body focused on competence, and not a trade body, our policy is to respond to regulators on professionalism proposals only and not to do so on wider topics such as Controlled Functions. The feedback from our members is described in the survey results attached and these responses supplemented by the comments of the members of the CISI Ireland Committee.

The CISI strongly believes in training and qualifications in risk, corporate governance and ethics for senior management, and focused upon all these areas well in advance of the financial crisis and subsequent regulatory reforms: consequently our leadership has made us well placed to work with regulators such as the FSA to develop standards in these areas, and to build qualifications to meet them. We would encourage the Central Bank to look at the work we have done on both standards and qualifications for efficiency and cost reasons. These standards and qualifications include a benchmark global qualification in Risk (CISI Risk in Financial Services) and an 'e' learning tool on governance and ethics, 'Integrity Matters', which includes a test passed by more than 5,000 individuals, together with an interactive seminar, 'Integrity at Work', delivered to more than 3,000 people.

We look forward to working with you and hope you will contact us again.

The more detailed answers to your questions are set out in the attached letter.

Yours Faithfully



Ruth Martin
Managing Director

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Detailed Responses to Questions 1 to 3
Results of CISI Member Survey