



Dear Sir/Madam

As part of the BEIS initiatives, the proposed amendments to strengthen risk management and internal controls - specifically operational and compliance controls - it is currently not clear what the expectations are, what the organisation will need to do to fully comply, and what constitutes effectiveness over operational/compliance controls. We have been presented with differing views of what may be needed; however, we require additional guidance and a detailed understanding of the required standards. Given this lack of clarity there is a risk that we, and other organisations, may over document, and incur additional cost unnecessarily, without any enhancements to the operations and oversight of the organisation. Therefore, this element of the provision is deemed unnecessary bureaucracy and we recommend the need for it be subject to a fundamental review. Our view is that it should be at the very least delayed while you conduct your review, or preferably the requirement removed. Should the additional requirements of operational and compliance controls go ahead we request further time to comply and additional information in relation to the methodology, materiality, definitions etc. It is being widely reported that companies are leaving the UK market due to the burden of complying with the regulations in the UK, and we see that requirements such as this will likely only accelerate that process and leave the UK market with a less vibrant future.

Should you have any questions in relation to the above, please don't hesitate to contact me.

Kind regards

  
*Spirent plc* 