

## *Financial Services and Markets*

### *Transaction reporting - a timely reminder*

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This week's heavy £2.45 million fine of Barclays for transaction reporting errors is a timely reminder of the significance the FSA places on transaction reports and the scope for errors to creep in in an area which may not always be given a high priority by management.

#### **What Happened?**

A range of errors were identified across all reportable asset classes, including: inaccuracies in batch reporting; incorrect trade times; incorrect client or counterparty identifiers; failure to identify the underlying instrument; failure to identify whether the transaction was a buy or sell; and, in a significant number of transactions (17 million), a failure to report at all.

#### **What are the lessons?**

The lessons for firms are clear:

- this is a high priority area in relation to which failings will be treated decisively
- allocation of responsibility for and oversight of transaction reporting processes must be clear and effective
- particular care should be taken to ensure continued accuracy of reports following a system or process change
- staff training should be thorough and repeated regularly
- sample testing of the accuracy of transaction reports should be carried out at appropriate intervals.

Please [CLICK HERE](#) to read the FSA's final notice.

Please [CLICK HERE](#) for the FSA's transaction reporting page and [CLICK HERE](#) for the Transaction Reporting User Pack (TRUP).

Please [CLICK HERE](#) for the Travers Smith guide to Transaction Reporting by Investment Managers.

For further advice in connection with transaction reporting requirements, please contact one of the following partners in our Financial Services and Markets department:

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